

REPUBLIC OF THE GAMBIA



Ministry of Finance and Economic Affairs (MoFEA)

**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK
(ESMF)**

FOR

**The Gambia Resilience Inclusion Skills Equity (RISE) Project
(P179233)**

October 2023

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ABBREVIATIONS & ACRONYMS

ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
EU	European Union
GoG	The Government of Gambia
GPE	Global Partnership for Education
LED	Local education Directorate
LMP	Labor Management Procedures
MERP	The Gambia Education Reform Project
MIA	Ministry of Internal Affairs
MoBSE	Ministry of Basic and Secondary Education
MoFEA	Ministry of Finance and Economic Affairs
MoHERST	Ministry of Higher Education, Research, Science & Technology
MOTIE	Ministry of Trade, Industry, Regional Integration and Employment
NAGAA	National Authority for Quality Assurance and Accreditation
NaNA	National Nutrition Agency
NEA	National Environmental Agency
PCU	Project Management Team
PDO	Project Development Objectives
POM	Project Operations Manual
PP	Procurement Plan
PTAs	Parent Teacher Associations
SEP	Stakeholder Engagement Plan
SMCs	School Management Committees
ToR	Terms of Reference
UNDP	The United Nations Development Programme
UNICEF	The United Nations International Children's Emergency Fund

EXECUTIVE SUMMARY

The government of the Gambia in collaboration with the World Bank developed a project to build on ongoing work in education and social protection by the government of the Gambia (GoTG) and the World Bank. This multi-sectoral project aims to scale up successful existing initiatives while selectively initiating a few new ones to ensure manageable, successful implementation. Aside from the World Bank's normal criteria (e.g., comparative advantage, alignment with government strategies, etc.).

This selectivity approach should also ensure the GoTG has the implementation capacity needed to deliver strongly on all components and activities. To clarify roles and responsibilities in implementation, the components have been structured according to implementing ministries or agencies; however, many of the activities overlap in their focus. For example, the project's overall focus on skills and employability for youth are addressed in both the TVET activities under Component 2, as well as the PEI activity under Component 3.

According to the World Bank project classification the RISE is a Moderate risk 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 and curriculum updates.

An ESMF is 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.

Project Description

The proposed project builds on ongoing work in education and social protection by the Government of The Gambia (GoTG) and the World Bank, aiming to continue, extend, and expand specific activities to further position The Gambia to reap its demographic dividend by enhancing education, employability, and support programs for the poor and vulnerable.

The Project Development Objective is to increase the foundational skills of students in ECE to Grade 4, access to job-relevant training for youth in the inland regions, and income-generating opportunities, including for the poor and vulnerable, in The Gambia. This multi-sectoral project aims to scale up successful existing initiatives while selectively initiating a few new ones to ensure manageable, successful implementation. The Project has 4 components;

Component 1: Improve foundational learning outcomes in literacy and numeracy

Sub-component 1.1 Extend structured pedagogy approach to improve classroom-level teaching and learning

Sub-component 1.2 Scale-up programs to expand access to formal education system

Sub-component 1.3 Scale-up efforts to strengthen systems for basic education system, including the TVET pipeline

Component 2: Increase access to labor-market relevant TVET programs

Sub-component 2.1 Scale-up competitive skills fund for rapid response and innovation in the TVET sector

Sub-component 2.2 Establish Two TVET Centers of Excellence focused on priority economic sectors/trades

Sub-component 2.3 Strengthen TVET systems through data, governance, and management for results

Component 3: Expand and enhance social safety nets to improve the incomes and productivity of the poor and vulnerable

Sub-component 3.1 establish a productive economic inclusion (PEI) program to skill target poor populations

Sub-component 3.2 Support Nafa Cash Transfers Program

Sub-component 3.3 Scale-up SP data and improve interoperability among Social Services

Component 4: Support project management, communications, and capacity-building

Component 5: Contingent Emergency Response Component

Rationale of The ESMF

As stated above, this ESMF is prepared under the World Bank Environmental and Social Framework (ESF) which requires the Borrower, to comply with eight (08) out of ten (10) Environmental and Social Standards (ESSs) (Table 1) relevant for the project. At this stage of project preparation, since the exact physical locations/sites of the specific sub-project activities are not yet confirmed, the project must prepare an ESMF, which provides guidelines on processes and procedures to follow during project implementation to ensure compliance with both the applicable national regulations and the ESF and its ESSs.

Approach and Methodology for ESMF Preparation

The ESMF has been prepared in accordance with the applicable national environmental and social regulations, the relevant World Bank ESSs, and the World Bank Group General Environmental, Health and Safety Guidelines (EHSGs)¹ which involve the following activities:

- Literature/Document review
- Pre-mission virtual meeting with the client and the World Bank
- Field visits/consultations with relevant institutions and implementing partners
- Weekly joint meetings with the Client and the World Bank to monitor progresses; and Information collation, analysis, and preparation of report.

The following relevant documents were reviewed:

- Project Concept Note (PCN)
- The Project Appraisal Document (PAD)
- Project Procurement Documents (PPSD)
- World Bank Environmental and Social Framework and relevant World Banks Safeguard Policies that have not been replaced by the Environmental and Social Standards (ESSs), and the World Bank Group General Environmental, Health and Safety Guidelines
- Relevant key international conventions ratified by The Gambia
- Good practice ESMF documents

¹ The guidelines for Environment, Health and Safety can be consulted at the following link:

https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/EHS-Guidelines/

- Borrowers Guidance² Notes of the ESS's from the World Bank and other guidance such as the World Bank Good Practice Notes such as Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,³ non- discrimination and persons with disability⁴, managing labor influx,⁵ and gender⁶.

Legal and Institutional Framework

National Policies

National Policy for the Advancement of Gambian Women and Girls (1999-2009)

Revised National Youth Policy (2016–2018)

Gambia Environment Action Plan, GEAP (2009-2018)

Gambia National Gender & Women Empowerment Policy (2010–2020)

The National Health Policy, 2012-2020

National Strategic Environmental Assessment Policy (2017- 2021)

National Development Plan (2018-2021)

National Climate Change Policy (2016 – 2025)

Acts and Regulations

National Environment Management Act, 1994

Environmental Quality Standards Regulations 1999

Environmental Discharge (Permitting) Regulations 2001

The Children's Act 2005

Mines and quarries Act, 2005

Anti-littering Regulations, 2007

The Women's Act 2010

Sexual Offences Act, 2013

² Guidance notes for Borrowers: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

³ Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works : <http://pubdocs.worldbank.org/en/215761593706525660/ESF-GPN-SEASH-in-major-civil-works-English.pdf>

⁴ Good Practice Note for Non-discrimination and Disability : <http://pubdocs.worldbank.org/en/366051548972401439/ESF-Good-practice-note-disability-french.pdf>

⁵ Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx <https://thedocs.worldbank.org/en/doc/fc074f5b6cc1621dc65675bf83c9d0b8-0290032021/original/ESF-Labor-Influx-Good-Practice-Note.pdf>

⁶ Good Practice Note for Gender <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

Trafficking in Persons Act, 2007

Criminal Code (2007)

Lands (Regions) Act, 1945

State Lands Act, 1990

Public Health Act, 1990

Land Acquisition & Compensation Act, 1990

Physical Planning and Development Control Act, 1991

International legal framework

Convention on Biological Diversity

United Nations Framework Convention on Climate Change

Convention No. 187 on the Promotional Framework for Occupational Safety and Health.

UN Convention on the rights of the Child, (UNICEF1989)

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)

World Bank Environmental and Social Framework (ESF)

The relevant World Bank Environmental and Social Standards are:

- ESS1 - Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 - Labor and Working Conditions
- ESS3 - Resource Efficiency and Pollution Prevention and Management
- ESS4 - Community Health and Safety
- ESS5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
- ESS8 - Cultural Heritage
- ESS10 - Stakeholder Engagement and Information Disclosure

Potential Environmental and Social Risks and Mitigations measures

According to the initial screening carried out during project preparation, the environmental and social risk classification (ESRC) is considered moderate.

Potential Environmental and Social (ESS) and Mitigation Measures for all the components is precise in chapter 5. The Environmental and Social Analysis and Screening Process with the Responsibility for the implementation of Sub Projects, the Summary of Procedural Steps and Responsibilities and the Institutional arrangement for Environmental and Social Management are summaries in chapter 6.

INTRODUCTION

The Gambia, a semi-enclaved country on the coast of West Africa, has an estimated population of 2.6 million people and an annual per capita Gross Domestic Product (GDP) of US\$772 in 2021.⁷ One of the poorest countries in the world, The Gambia's economy suffers from inadequate diversification, susceptibility to external shocks, and a lack of integration into regional and international markets. The economy relies primarily on agriculture, tourism, and remittance inflows. Agriculture contributes around 20 percent of GDP and serves as the main source of livelihood for roughly 80 percent of the rural population.⁸ The country brands itself as the “Smiling Coast” of Africa, and tourism accounts for another 20 percent of GDP.

The Gambia's economic outlook remains favorable, although growth is projected to remain below the pre-pandemic level in the medium term. GDP is projected to grow by 5.5 percent in 2023–25, supported by increased activity in all sectors, with relatively higher performance in industry and services. Services and agriculture are expected to continue to grow, assuming higher tourist inflows as advanced economies recover and favorable rainfalls, respectively. Public infrastructure programs and stronger remittances to support private investment would support growth in the industry sector. The Gambia's Human Capital Index score is 0.42, ranking 137th out of 174 countries.⁹ This score, which is on par with the average for Sub-Saharan Africa, implies that under current investments in human capital, the future earning potential of children born today will be 42 percent of what they could be with complete education and adequate health services. This is slightly higher than the average for SSA and higher than the average for LICs. Between 2010 and 2020, the HCI value for The Gambia increased from 0.37 to 0.42.

1.1 Project's background and description

In the coming decades, The Gambia, like much of Sub-Saharan Africa, aims to convert its youth bulge into a demographic dividend. To enhance productivity of the youth in the labor market, the government's strategy is to provide increased opportunities and second chances to foundational learning, skills development, and access to social safety nets. These areas are selected for how they can complement and build upon one another. For example, social safety nets for the poor and vulnerable support early childhood development through consumption support and information, so disadvantaged children have a better chance to grow up healthy and arrive at school ready to learn. Improving foundational learning programs will help its young population stay in and succeed in more education and investing in skills development through TVET can enhance productivity and employability. Finally, productive economic inclusion programs can help create job opportunities for the poor and vulnerable. To achieve the demographic dividend, such supply-side efforts will need to be complemented by demand-side interventions to stimulate the private sector and generate more and better employment opportunities.

The proposed project builds on ongoing work in education and social protection by the Government of The Gambia (GoTG) and the World Bank, aiming to continue, extend, and expand specific activities to further position The Gambia to reap its demographic dividend by enhancing education, employability, and support programs for the poor and vulnerable. The Education Sector Support Program (ESSP) (P162890), which closed in June 2023, expanded access to early childhood development and basic education while improving the quality of teaching and learning. Similarly, the second Africa Higher Education Centers of Excellence (ACE) for Development Impact project (P169064)

⁷ World Bank. 2021. *GDP per capita (current US\$) - Gambia, The*. Available at: <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=GM>

⁸ World Bank. 2022. *Agriculture, forestry, and fishing, value added (% of GDP) - Gambia, The*. Available at: <https://data.worldbank.org/indicator/NV.AGR.TOTL.ZS?locations=GM>

⁹ V., Corral R., Paul A., Dehnen, N., Dsouza, R., Mejaleko, J., Pennings, S. 2020. *The Human Capital Index 2020 Update : Human Capital in the Time of COVID-19 (English)*. Washington, D.C.: World Bank Group. Available at: <http://documents.worldbank.org/curated/en/456901600111156873/The-Human-Capital-Index-2020-Update-Human-Capital-in-the-Time-of-COVID-19>

which is scheduled to close in June 2024 is supporting The Gambia in improving the quality, quantity, and development impact of higher education in the University of Science, Engineering and Technology (USET) through regional specialization and collaboration.

The Gambia Social Safety Net Project (P167260), scheduled to close in October 2023, is increasing coordination of social protection activities, providing temporary social assistance support to rural households in the wake of COVID-19, and is providing consumption support to the extreme poor through the Nafa cash transfer program, which includes social and behavioral change communication activities to provide direct and indirect assistance to promote for enhanced parenting, education, financial capabilities, and skill development.

1.2 ESMF objective

The ESMF sets out the procedures to ensure that the environmental and social risks and impacts associated with the implementation of the project activities are properly assessed, monitored, and managed throughout the project lifecycle. The ESMF will apply to the entire project.

Furthermore, during implementation, once the technical designs and physical footprints of the proposed sub-project activities are known, the ESMF screening form (annex 6) will be used for the screening of all activities which will inform subsequent preparation of site-specific standalone environmental and social risk management instruments. This will ensure that all potential risks and impacts of proposed project activities are identified, assessed, evaluated, and managed, using the mitigation hierarchy, throughout the project lifespan.

It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. It includes adequate information on the area in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

The ESMF will establish and apply a mitigation hierarchy that must (i) anticipate and/or 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 risks and impacts; and (iv) where significant residual impacts remain, compensate, or offset them, where technically and financially feasible.

The ESMF is designed to be a screening mechanism for environmental and social impacts of investments activities when their sites are unknown prior to project implementation. It is therefore intended as a tool for identifying and assessing the potential future environmental and social impacts of investment be financed by the project. As such, it serves as a guide for the preparation of specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) for project activities whose number, physical locations, and environmental and social characteristics are known.

Specifically, the objectives of the ESMF are to:

- Identify all relevant potential environmental and social risks and impacts that may arise because of the project and the sub-projects that it will support.
- Specify appropriate roles and responsibilities of involved stakeholders in the implementation of the ESMF.
- Develop sub-project review procedures as well as forms, guidance, and checklists to apply technical input for the sub-projects.
- Develop a screening procedure to identify the environmental and social issues associated with the sub-projects and determine which environmental and social risk management instruments will need to be prepared: ESIA with ESMP, stand-alone ESMP, a RAP, a Process Framework (PF), a Biodiversity Management Plan (BMP)

and/or a Cultural Heritage Management Plan (CHMP).

- Review and assess the capacity of the project implementation entities, especially the Project Coordination Unit but also other government agencies that will play a contributive role into the implementation of the project, to screen sub-projects and monitor and report on the implementation of the relevant environmental and social (E&S) instruments and make proposals for capacity enhancement as appropriate.
- Provide estimates for the budget required for project preparation and potential implementation of E&S instruments during the implementation phase of the project.
- Develop a public consultation and stakeholder engagement strategy.
- Define appropriate environmental and social standards performance indicators.
- Provide practical information resources for implementing the ESMF.

1.3 ESMF's rationale

As stated above, this ESMF is prepared under the World Bank Environmental and Social Framework (ESF) which requires the Borrower, to comply with eight (08) out of ten (10) Environmental and Social Standards (ESSs) (Table 1) relevant for the project. At this stage of project preparation, since the exact physical locations/sites of the specific sub-project activities are not yet confirmed, the project must prepare an ESMF, which provides guidelines on processes and procedures to follow during project implementation to ensure compliance with both the applicable national regulations and the ESF and its ESSs. Other instruments prepared by the project include the Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and a Resettlement Policy Framework (RPF). These documents are to guide the management of potential environmental and social risks and impacts associated with the project.

The relevant World Bank Environmental and Social Standards are:

- ESS1 - Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 - Labor and Working Conditions
- ESS3 - Resource Efficiency and Pollution Prevention and Management
- ESS4 - Community Health and Safety
- ESS5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
- ESS8 - Cultural Heritage
- ESS10 - Stakeholder Engagement and Information Disclosure

1.4 Approach and Methodology for ESMF Preparation

The ESMF has been prepared in accordance with the applicable national environmental and social regulations, the relevant World Bank ESSs, and the World Bank Group General Environmental, Health and Safety Guidelines (EHSGs)¹² which involve the following activities:

- Literature/Document review
- Pre-mission virtual meeting with the client and the World Bank
- Field visits/consultations with relevant institutions and implementing partners
- Weekly joint meetings with the Client and the World Bank to monitor progresses; and Information collation, analysis, and preparation of report.

The following relevant documents were reviewed:

- Project Concept Note (PCN)
- The Project Appraisal Document (PAD)
- Project Procurement Documents (PPSD)
- World Bank Environmental and Social Framework and relevant World Bank Safeguard Policies that have not been replaced by the Environmental and Social Standards (ESSs), and the World Bank Group

General Environmental, Health and Safety Guidelines

- Relevant key international conventions ratified by The Gambia
- Good practice ESMF documents
- Borrowers Guidance¹³ Notes of the ESS's from the World Bank and other guidance such as the World Bank Good Practice Notes such as Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,¹⁴ non- discrimination and persons with disability¹⁵, managing labor influx,¹⁶ and gender¹⁷.

This study incorporates inclusive and participatory consultative methods with key stakeholders to inform and supplement data collected for the ESMF. The approach is as follows:

- A scoping meeting with the team from the Ministry of Finance and Economic Affairs (MoFEA), the Ministry of Basic and Secondary Education (MoBSE), Ministry of Higher Education, Research, Science & Technology (MoHERST), and the National Nutrition Agency (NaNA) to agree on the objectives of the mission and the main issues related to the preparation of this document, to identify the stakeholders to be consulted, and to obtain the basic documents (concept note, sectoral documents, etc.)
- A document review through the collection and use of project documents (for an appropriation of the Project components and its potential activities), national policies and strategies, ESF and ESS of the World Bank and the Environmental, Health and Safety Guidelines (EHSG) of the World Bank Group.
- Meetings/ consultations was held with project stakeholders. The objective of this process was to collect opinions, concerns, and recommendations of stakeholders on the project.
- To this effect, focus group discussions were conducted for teachers in lower basic schools and also for facilitators and tutors for the Effective Intervention and Second Chance Education respectively.
- Consultations were conducted for PAPs including women groups, youth, and other community members.
- Governors and Regional Education Directors were also interviewed.
- In addition, interviews were conducted with various stakeholders from the 3 agencies (MoBSE, MoHERST and NANA) in related to the different components which affect their respective institutions.

¹² **The guidelines for Environment, Health and Safety** can be consulted at the following link: https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/EHS-Guidelines/

¹³ **Guidance notes for Borrowers:** <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

¹⁴ **Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works :** <http://pubdocs.worldbank.org/en/215761593706525660/ESF-GPN-SEASH-in-major-civil-works-English.pdf>

¹⁵ **Good Practice Note for Non-discrimination and Disability :** <http://pubdocs.worldbank.org/en/366051548972401439/ESF-Good-practice-note-disability-french.pdf>

¹⁶ **Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx** <https://thedocs.worldbank.org/en/doc/fc074f5b6cc1621dc65675bf83c9d0b8-0290032021/original/ESF-Labor-Influx-Good-Practice-Note.pdf>

¹⁷ **Good Practice Note for Gender** <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

- Representatives from the various agencies were consulted and informed about the project and also updated on the feedback from the PAPs consultation.

1.5 Project intervention area location

An ESMF is 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 would be revised to include the new project activities financed under the RISE project and update the developments in monitoring and implementation arrangements, as well as enhanced E & S capacity of the PCU at MoFEA including E&S of other Ministries.

2 PROJECT DESCRIPTION

2.1 The Project Development Objective

PDO Statement

To increase the foundational skills of students in ECE to Grade 4, access to job-relevant training for youth in the inland regions, and income-generating opportunities, including for the poor and vulnerable, in The Gambia.

PDO Level Indicators

PDO 1: Increase early grade reading assessment scores for students in grade 3

PDO 2: Increase number of TVET study places available to youth in inland regions via new or improved TVET institutes

PDO 3: Number of beneficiaries who are self-employed or employed one year after receiving training or support

PDO 4: Enhance safety nets for the poor and vulnerable

2.2 Project Components

This multi-sectoral project aims to scale up successful existing initiatives while selectively initiating a few new ones to ensure manageable, successful implementation. Aside from the World Bank's normal criteria (e.g., comparative advantage, alignment with government strategies, etc.)

1. This operation deployed a unique set of selectivity criteria to help prioritize activities:
2. scale-up or continue activities that are already underway with positive impact, especially those disbursing well;
3. support activities that strengthen systems, especially those that will benefit a variety of initiatives in the future (e.g., data systems, inter-operability);
4. invest in new activities if they have a strong research base and evaluation results and
5. demonstrate a proof-of-concept that additional financing can later help scale up.

This selectivity approach should also ensure the GoTG has the implementation capacity needed to deliver strongly on all components and activities. To clarify roles and responsibilities in implementation, the components have been structured according to implementing ministries or agencies; however, many of the activities overlap in their focus. For example, the project's overall focus on skills and employability for youth are addressed in both the TVET activities under Component 2, as well as the PEI activity under Component 3.

Table 1 Project Sub- Components

Project Activities	SELECTION CRITERIA				Notes
	Continuation or Scale Up	Strengthen systems	New with research base	Proof-of-concept (PoC)	
Sub-Comp 1.1	✓		✓		New curriculum developed under ESSP; focus now on comprehensive roll-out
Sub-Comp 1.2	✓				Continuing programs established under ESSP
Sub-Comp 1.3	✓	✓			Expanding work initiated ESSP
Sub-Comp 2.1			✓		New activity building off experience of SkYE fund
Sub-Comp 2.2				✓	Establishing two of the proposed CoEs as PoC

Sub-Comp 2.3		✓			New
Sub-Comp 3.1			✓	✓	PEI has strong research base; serve as PoC
Sub-Comp 3.2	✓				Continuing program established under GSSN
Sub-Comp 3.3	✓	✓			Continuing work under GSSN

Component 1: Improve foundational learning outcomes in literacy and numeracy

Sub-component 1.1 Extend structured pedagogy approach to improve classroom-level teaching and learning

The sub-component expands existing efforts underway to boost foundational literacy and numeracy. Leveraging lessons from the Effective Intervention RCT, this work will build on a cohesive and integrated pedagogical approach, which reflects recent efforts on the curriculum redesign, teaching at the right level, and adjusting the language of instruction policies, for improved learning outcomes.

The planned program will focus on:

- (i) well-designed student books and materials at a one book per child ration.
- (ii) Teachers' guides that provide daily lesson plans for teachers.
- (iii) Teacher training to reinforce specific skills in teaching the lesson plans.
- (iv) On- going support to teachers to implement the structured pedagogy program, including coaching and/or communities of practice; and (v) assessment results for monitoring and adapting program implementation.

Sub-component 1.2 Scale-up programs to expand access to formal education system

This sub-component focuses on providing avenues to enter or reenter into formal schooling for the most vulnerable populations. The approach would be modeled on the ongoing ESSP's pilot program in Region 5, which transferred funding to mothers' clubs at the community level and empowered them to decide how best to spend the funds to support families (uniforms, school feeding, etc.) with the goal of improving enrollment of out-of-school children. Leveraging data from the GamSR, this scale-up would target districts with the lowest enrollments. Capitalizing on the ongoing Early Childhood Development (ECD) work under MoBSE (e.g., play-based curriculum, training of facilitators, etc.), the sub-component would also continue ECD enrollment efforts for ages 3-6 and possibly pilot a childcare intervention.¹⁰ Given the improved parenting interventions under the Nafa Cash Transfers, this could facilitate a more integrated, cross-sectoral approach to early childhood development.

Sub-component 1.3 Scale-up efforts to strengthen systems for basic education system, including the TVET pipeline

The sub-component will continue system-level improvements to:

- (i) The education management information system to integrate better with human resource and social registry data.

¹⁰ The team intends to apply for the recipient-executed trust fund window under the Early Learning Partnership which gives from US\$1 million to US\$2 million for childcare/parenting interventions. This would likely include offering childcare to facilitate participation in skills and training programs and using skills and training programs to build the childcare workforce.

- (ii) Improve learning outcome assessment data; enhance the distribution and utilization of education data at decentralized levels, including school communities; and update strategies for improved, data-driven teacher deployment.
- (iii) the teachers training institute to build leadership capacity; develop, improve, reorganize courses on offer, address student intake/output strategy, and rehabilitate its campus and classrooms;
- (iv) In addition, the acquisition of equipment and supplies to foster a pipeline of students interested in, exposed to, and equipped with TVET-related skills.

Component 2: Increase access to labor-market relevant TVET programs¹¹

Sub-component 2.1 Scale-up competitive skills fund for rapid response and innovation in the TVET sector.

Rapidly address the stock of unemployed youth, the project will finance a competitive grant mechanism to improve the quality and quantity of youth training programs that meet existing job needs, or, in the case of self-employment, successfully meet market opportunities. The training fund will incorporate lessons learned from the ongoing 'Skills for Youth Employment' (SkYE) Fund and from the WB's extensive experience in supporting training funds. Depending on how the fund is designed, it may finance both formal and non-formal training and target specific sectors, regions, and beneficiaries. Given the current context in The Gambia, the training fund might particularly focus on spurring innovative training approaches, including by private training providers and private sector actors, with a strong focus on graduate employability, targeting priority economic sectors, and/or women vulnerable population groups. For illustrative purposes, the ongoing SkYE fund supported a competitive tender process to help eight TVET institutions to offer programs in Solar Installation, CCTV Installation, and Vehicle Diagnostic Techniques and Repairs. Prospective students could then apply to enroll and receive financial support.¹² The competitive skills fund will be designed to boost participation of women in non-traditional, male-dominated, and higher paying sectors in recipient TVET institutions through, inter alia, targeted scholarships, and information campaigns.

Sub-component 2.2 Establish Two TVET Centers of Excellence focused on priority economic sectors/trades.

To address the flow of youth, this sub-component serves the dual purpose of promoting equitable access to and improving the quality and relevance of TVET by operationalizing a TVET Centre of Excellence (CoE) focused on priority economic sectors (e.g., agri-business and mechanization) and trades in two of The Gambia's underserved regions. The CoEs will be established on new locations meant for TVET centers/education institutions. World Bank will finance construction of the facilities though no land acquisition is envisaged.

A Strategic Investment Plan (SIP) will serve as a strategic blueprint for the development of the proposed TVET institutions.

This comprehensive planning document will require a thorough assessment of the needs, challenges, and potentials of each prospective TVET institution, including the needs of the community it serves and its potential impact on regional economic development. Upon completion, the SIP will offer a data-driven strategy to guide the subsequent development of the CoEs, encompassing all aspects from program offer and curriculum, infrastructure and equipment, and industry partnerships to staff training and management systems that will include mechanisms for graduate tracking. The SIP will also include a Gender Action Plan that identifies measures

¹¹ The team may apply for up to US\$3.5 million in co-financing and project preparation support for technical and vocational education through the Korea - World Bank Group Partnership Facility. The funding can help support: preparing physical space for training; establishing strong relationships and public-private partnerships with industries; developing curriculum and training materials to improve the quality and relevance of training programs; training instructors, teachers and managerial staff; and supporting career guidance and industry placement networks for young adults.

¹² <https://yep.gm/opportunity/skye-fund-training-opportunities>

to support female students, including discounted tuition for female students, the availability of on-site childcare facilities, gender-sensitive teaching methods, and gender-related support services to foster inclusivity.

This sub-component will specifically finance the following:

Initiation and execution of Strategic Investment Plans for tailored, data-driven CoE development; eco-friendly construction and refurbishment of the CoEs, including the provision of renewable energy systems, rainwater harvesting systems, and the use of sustainable construction materials. Acquisition of modern, state-of-the-art training equipment to enhance the learning experience and relevance. Development, implementation, and assessment of competency-based training programs, that include an emphasis on generic and occupation-specific green skills, encompassing curriculum design, materials production, instructor training, and the promotion of internships.

Sub-component 2.3 Strengthen TVET systems through data, governance, and management for results.

Activities financed under this sub-component will strengthen those system elements that are most essential to facilitate the performance and sustainability of the TVET sector, with a particular priority for activities necessary to support the proposed CoE.

The selection of activities will be guided by the implementation plans for the national TVET Policy and is expected to include: supporting evidence-based decision making through promoting the timely availability and use of credible, relevant data;

- i. improving the effectiveness of stakeholder collaboration, including through sector skills councils related to the CoE; enhancing quality assurance mechanisms, including through strengthening National Accreditation and Quality Assurance Authority (NAQAA) on quality assurance in the trades and qualification levels of the CoE;
- ii. and evaluating the TVET funding model, including analyzing approaches to increase funding and to improve efficiency and effectiveness of expenditures.

Component 3: Expand and enhance social safety nets to improve the incomes and productivity of the poor and vulnerable

Sub-component 3.1 establish a productive economic inclusion (PEI) program to skill target poor populations

Productive economic inclusion measures are proven to stimulate productive recovery of households, particularly after being affected by shocks. They also improve employment prospects for underserved segments of the labor force and contribute to women's economic empowerment. PEI measures are intended to enable households to develop sustainable income-generating activities as an exit strategy from reliance on cash transfers. This proposed sub-component will focus on areas that develop human capital and promote sustainable and resilient livelihoods by leveraging social protection and skills development. It focuses on the most vulnerable populations by providing avenues to improve productivity and develop livelihoods. The sub-component will pilot and subsequently scale-up a productive economic inclusion approach in a few selected rural and urban districts, with a focus on youth employment. PEI activities will also have a keen focus on supporting persons with disabilities and women. The package would likely include several activities, such as access to skills through basic business training, coaching to build confidence and motivation, promote participation in savings associations, and access to start-up capital through a business grant. The modalities and package will be defined in the context of The Gambia and will draw upon regional experiences of productive inclusion programs (e.g., Niger and Ghana) and productive inclusion programs focused on youth and urban areas (e.g., Senegal, Togo, Liberia, and Benin).

Sub-component 3.2 Support Nafa Cash Transfers Program

The poverty-targeted social assistance program started with a pilot of 2,770 households in three of the poorest districts in September 2021. In July 2022, the Nafa Program was scaled up to reach 11,736 households in an

additional 17 poor districts with cash transfers and SBCC interventions. The objective of this component would be to continue (and complete) delivery of the Nafa program to the 17 districts, as well as expand the Nafa program to reach new eligible beneficiaries across the country, especially in urban areas. The Nafa program will continue to target beneficiaries by using data from the GamSR.

In addition to delivery of the cash transfers, the program will continue to provide SBCC trainings to promote behavioral change and strengthen human capital development through parenting and Early Childhood Development interventions, and good use of the funds through financial capability and inclusion support, including use of e-payments and promoting savings. Further, this component will support shock-responsive cash transfers, as needed, to increase household resilience to shocks and prevent negative coping mechanisms.

Sub-component 3.3 Scale-up SP data and improve interoperability among Social Services

This sub-component will support the completion of data collection for the ¹³ Social Safety Nets, including to the remaining three districts to create a nationwide social registry across all 43 districts in the Gambia. The component will also support operationalizing a robust data sharing plan to ensure that data is available for use in all social sectors, including education, to fulfill its role as the single entry-point for social interventions. In addition to completion of the GamSR^[66] across GamSR and other data systems, such as the EMIS and the national civil registry. This sub-component will also support building update mechanisms to the GamSR to ensure the registry remains relevant. To continue to strengthen the SP system, the sub-component will also provide continued support to social protection monitoring and evaluation and initiate a national strategy for a shock-responsive, shock-resilient SP system, given The Gambia's vulnerability to climate change and fragility.

Component 4: Support project management, communications, and capacity-building

This component will provide financing towards: (i) institutional arrangements for the project; (ii) project management and operational costs; and (iii) C. The component will also support communication campaigns and research studies that will improve programming.

Component 5: Contingent Emergency Response Component

A zero-dollar Contingency Emergency Response Component (CERC) will only be activated and funded in accordance with IPF WB Policy Paragraph 12 and 13 for situations of urgent need of assistance. It will allow for the rapid reallocation of project proceeds in the event of a natural or manmade disaster or crisis that has caused, or is likely to imminently cause, a major adverse economic or social impact. The Government of The Gambia will need to declare an emergency or provide a statement of fact justifying the request for the activation of the use of emergency funding to trigger the CERC.

¹³ Interoperability is the ability of different functional units—e.g., systems, databases, devices, or applications—to communicate, execute programs, or transfer data in a manner than requires the user to have little or no knowledge of those functional units (ISO/IEC 2382).

3 ENVIRONMENTAL AND SOCIAL POLICIES, REGULATIONS, AND LAWS

3.1 National Policies

Table 2 below indicates the relevant national policies that will guide the development and implementation of the Project.

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.
National Climate Change Policy (2016 – 2025)	Policy provides the framework for managing climate risks, building institutions, capacities, and opportunities for climate-resilient Development	The Project is planning to build infrastructure taking into account climate change pattern to protect against erosion.

3.2 Legal framework

The legal framework for this study consists of the international conventions signed and ratified by The Gambia as well as the national Acts that provide a framework for the implementation of activities in a sustainable development perspective.

Table 3: National legal framework

Title of Act or Regulations	Description	Relevance to the Project
National Environment Management Act, 1994	Principal legislation in environmental management; Part V of Act provides for certain projects listed to be considered for ESMF and other E&S assessment (ESIA, ESMP, Audit, etc.) Responsible for providing the final approval of environmental assessments and certifying, where appropriate, the compliance of the proposed activities with Gambia's environmental protection legislation	Some of the proposed project activities falls under Schedule A which requires ESMF
Environmental Quality Standards Regulations 1999	Regulations declare standards set out in Schedule 1 in respect of ambient air, saline waters, surface freshwater and Groundwater	Project implementation can generate dust and pollute surface freshwater, and groundwater.
Environmental Discharge (Permitting) Regulations 2001	Regulations require that a permit is obtained for discharge 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 the potential to discharge potentially polluting liquids into the tributaries and other surface water bodies
The Children's Act 2005	Act sets out the rights and responsibilities of children and provides for their care, protection, and Maintenance	Rights of children may be impacted by the project implementation when children are used during the works.
Mines and quarries Act, 2005	Act makes provision for prospecting for minerals, for carrying out mining and quarrying operations including gravel, sand and for connected matters	Construction/Renovation of some TVET project implementation involves use of sand and gravel aggregates mined.
Anti-littering Regulations, 2007	Addresses waste management and pollution issues in relation to environmental health and hygiene	The project must ensure that all waste produced during all phases is well managed.
The Women's Act 2010	Aims to advance women's rights to land and natural resources to promote their economic and social empowerment	Relevant to this project in view of potential impact on agricultural land farmed by women; avoid gender-based violence (GBV) and sexual exploitation and abuse and sexual harassment (SEA/SH).
Sexual Offences Act, 2013	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 within the Project sites against sexual offences, which is defined in the Act.

Title of Act or Regulations	Description	Relevance to the Project
Trafficking in Persons Act, 2007	Aim to avoid human trafficking and define the procedures and legislation regarding how to process cases or trial of human trafficking	The trafficking in Person's Act, 2007 is being enforced throughout the country. The main purpose of the act is to prevent, suppress and punish the perpetrators of trafficking in persons and to rehabilitate and re-integrate survivors of trafficking.
Criminal Code (2007)	Define the repressive criminal acts and also the procedures for trial, especially for cases regarding violence against women and children.	The criminal code provides for traditional offences to sexual violence against women such as rape. According to section 122, the maximum punishment for rape is life imprisonment, and the maximum punishment for attempted rape is 7 years.
Lands (Regions) Act, 1945	Regulates land tenure and property rights as well as general land administration in areas under Customary Land Tenure system. Act covers all Provinces land outside State Lands Areas.	Land in some parts of project areas fall under this Act. Potential project sites are held and administered under this Act.
State Lands Act, 1990	Regulates land tenure and property rights as well as general land administration in State Lands areas.	All lands in the countries fall under this Act. Potential project sites in these areas are held and administered under this Act
Public Health Act, 1990	Protects public and environmental health including abatement of nuisances and any condition that may be injurious to health.	Relevant to Project since dust, noise and other risks can be associated with the Project.
Land Acquisition & Compensation Act, 1990	Provides for consultation, resettlement, and compensation of land.	Project might cause involuntary resettlement due to certain project activities such as road construction coastal protection, etc. and the Act could be used in resettlement and compensations.
Physical Planning and Development Control Act, 1991	Ensures developments in The Gambia are in line with land use planning and construction standards.	The project construction activities shall be in line with national land use and planning rules.

3.3 International legal framework

These are the international conventions signed and ratified by The Gambia that are relevant for this project. These are detailed in Table 4 below.

Table 4: International legal framework related to the project

Title of the text	Contextual reference	Relevance to the project
Convention on Biological Diversity	The convention has three main goals: the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources. Its objective is to develop national strategies for the conservation and sustainable use of biological diversity and it is often seen as the key document regarding sustainable development.	<p>As this convention in its Article 14 deals with "Impact Assessment and Harm Reduction", which states that: "Each Contracting Party shall, to the extent possible and appropriate:</p> <p>a) adopt procedures to require environmental impact assessments of its proposed projects that are likely to have significant adverse effects on biological diversity with a view to avoiding and minimizing such effects, and, where appropriate, provide for public participation in such procedures</p> <p>b) take appropriate steps to ensure that the environmental effects of its programs and policies that are likely to have a significant adverse effect on biological diversity are duly taken into account</p> <p>Henceforth, foreseen contractors working within the premises of these NP/NR would have to comply with the provision.</p>
United Nations Framework Convention on Climate Change	To stabilize greenhouse gas concentrations in the atmosphere at a level that will prevent dangerous human interference with the climate system, in a time frame which allows ecosystems to adapt naturally and enables sustainable development.	Article 4(f) of this Convention states that the signatory parties shall: "take into account, to the extent practicable, climate change considerations in their social, economic and environmental policies and actions and shall use appropriate methods, such as nationally formulated and defined impact assessments, to minimize adverse economic, public health and environmental effects of projects or measures undertaken by them to mitigate or adapt to climate change".

Title of the text	Contextual reference	Relevance to the project
Convention No. 187 on the Promotional Framework for Occupational Safety and Health.	Promotional Framework for Occupational Safety and Health	Article 2 (paragraphs 1, 2 and 3) states that: "1. Each Member ... shall promote the continuous improvement of occupational safety and health to prevent work-related injuries, illnesses and deaths Each Member shall take active steps towards the progressive realization of a safe and healthy working environment". Each Member shall, in consultation with the most representative employers' and workers' organizations, periodically consider what steps could be taken to ratify the relevant ILO Conventions on occupational safety and health.
UN Convention on the rights of the Child, (UNICEF1989)	An international human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children.	<p>The rights in the treaty include the right to education, the right to play, the right to health and the right to respect privacy and family life.</p> <p>The project could potentially affect the right to health of the child through the generation of dust, and air pollution, poor waste management, and spread of malaria due to stagnant water in quarry pits, but also there is a risk that children can be hired during works. The PCU and the MOFEA teams will closely monitor this particularity.</p>
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)	Requires countries to eliminate discrimination against women and girls in all areas and promotes women's and girls' equal rights.	<p>Convention highlights the right of women to own, manage, enjoy, and dispose of property as 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.</p> <p>Women are the main targets of the Project and will ensure that they have access to benefits of this Project in the same way as men. This is particularly relevant to the project on Component 1B and 2; particularly on Component 1B with matching grant-funded activities where women and children might constitute a center target. Close monitoring by the PCU and the MOFEA team will help to mitigate such potential risks.</p>

3.4 World Bank Environmental and Social Framework (ESF)

3.4.1 Scope of the Environmental and Social Framework (ESF)

The World Bank's ESF describes the Bank's commitment to promoting sustainable development through a policy and set of environmental and social standards (ESS) designed to support borrower country projects to end extreme poverty and promote shared prosperity. It allows for adaptive management of project risks and impacts and integrates both environmental and social dimensions across the 10 Standards. The eight relevant standards are assessed and how the project will address gaps between national law and the ESF (Table 5).

Table 5. World Bank Environmental and Social Standards and Relevance to the Project

Environmental and Social Standards (ESS)	Environmental and/or social aspects Covered	Relevance to the Project
ESS 1: Assessment and management of environmental and social risks and impacts	The ESS 1 sets out the Borrower's responsibilities to assess, manage, and monitor the environmental and social risks and impacts associated with each stage of a project financed by the Bank through Investment Project Finance (IPF), to achieve environmental and social outcomes consistent with the ESS.	<p>The Gambia Resilience, Inclusion, Skills, and Equity Project is likely to generate environmental and social risks and impacts that will need to be managed throughout the project cycle (preparation, construction, operation, and decommissioning). Therefore, ESS1 applies to the project.</p> <p>To assess, manage and monitor the environmental and social risks and impacts of the project, the project has prepared the ESMF and as required, will have to prepare ESIA/ESMPs.</p>
ESS 2: Labor and Working Conditions	The standard recognizes the importance of job creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote constructive relationships between project workers and the coordination/manager, and enhance the benefits of project development by treating workers fairly and ensuring safe and healthy working conditions	<p>The planning and implementation of some of the project activities will result in the creation of jobs (goods and services suppliers, construction, etc.) and the requirements for worker treatment and working conditions as defined in this ESS will need to be met. In addition, the analysis of working conditions will be conducted in the context of the COVID-19 pandemic to ensure worker health and safety throughout the project cycle.</p> <p>A LMP will be prepared to address this issue.</p>
ESS 3: Resource Efficiency and Pollution Prevention and Management	The ESS describes the requirements for addressing resource efficiency, pollution prevention and management throughout the life cycle of a project	The project phases (construction, operation, and decommissioning) will require the use of resources and will result in environmental and resource pollution risks, in relation to which the requirements of the ESS No. 3 to address resource efficiency and pollution prevention and management, including waste management, must be met.

Environmental and Social Standards (ESS)	Environmental and/or social aspects Covered	Relevance to the Project
		<p>The ESMF has made some provisions specifically to address issues related to pollution control and resource efficiency management.</p> <p>Recommendation have been made to screen all foreseen subproject activities and if deemed relevant prepare, in addition to the project 's ESIA's, site specific ESMP to be carried out during implementation to consider the risks of pollution and degradation of natural resources.</p>
ESS 4: Community Health and Safety	<p>The standard addresses the risks and impacts on the safety, security, and health of project-affected communities, and the respective responsibilities of Borrowers to reduce or mitigate these risks and impacts, with particular attention to groups that, because of their circumstances, may be vulnerable.</p>	<p>All populations in the vicinity of the intervention areas, as well as workers, are likely to be impacted from a safety and health perspective during Project implementation. Also, the proposed project activities could have adverse health, safety, and security effects, including the risk of sexual exploitation and abuse of neighboring communities.</p> <p>Besides provisions already embedded in the ESMF, the E&S screening of project subcomponent activities will guide the preparation of an ESIA for the project and site-specific ESMP and where necessary a Biodiversity Management Plan (BMP). Both the ESIA and the related site-specific instruments to be prepared during implementation should consider impacts on community health and safety. A SEA/SH Prevention and Response Action Plan has been prepared and will be implemented before the start of project activities. The action plan includes mapping of GBV services where survivors of GBV, SEA/SH could be referred during implementation, awareness raising for community members on SEA/SH, content of CoC, how to signal a misconduct/abuse and what services are available and regular consultations with women on accessibility of GM and effectiveness of SEA/SH mitigation.</p>

Environmental and Social Standards (ESS)	Environmental and/or social aspects Covered	Relevance to the Project
ESS 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	The basic principle of the standard is that involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it should be limited, and appropriate measures to minimize negative impacts on displaced persons (and host communities that receive displaced persons) should be carefully planned and implemented.	<p>The Project will require the construction and/or rehabilitation of TVET facilities in the project areas. The design of some of these activities will likely involve land acquisition, restriction of access to some assets/properties which might result in risks of involuntary resettlement of populations, against which the requirements of ESS No. 5.</p> <p>It must be met to avoid, and wherever possible minimize, involuntary resettlement by considering alternative project designs; avoid eviction; and mitigate unavoidable adverse social and economic impacts resulting from the above-mentioned land acquisition or restrictions on land use.</p>
ESS 8: Cultural heritage	The standard recognizes that cultural heritage provides a continuum of tangible and intangible forms between the past, present, and future. ESS 8 sets out material measures designed to protect cultural heritage throughout the life of a project	This standard is relevant to the project in that there will be subprojects activities that include construction/rehabilitation. During the civil works some archaeological or cultural remains may be accidentally discovered. For this reason, ESS 8 on cultural heritage is relevant for the project. The ESMF provides for the protection of cultural sites and potential archaeological finds by applying chance finds procedures in accordance with national legislation and procedures.
ESS 10: Stakeholder engagement and information	The standard recognizes the importance of open and transparent consultation between the Borrower and project stakeholders as an essential element of international good practice. Effective stakeholder consultation can improve the environmental and social sustainability of projects, enhance project acceptance, and contribute significantly to the successful design and implementation of projects	<p>ESS 10 applies to the Project as all World Bank-financed projects are subject to this Standard. The Government of The Gambia will develop and implement a Stakeholder Engagement Plan (SEP) commensurate with the nature, scope and potential risks and impacts of the project.</p> <p>In addition, the PCU will disseminate information about the project to enable stakeholders to understand its risks and impacts, as well as its potential opportunities the project could rely upon to achieve its development objective.</p> <p>The PCU will engage them throughout the life cycle of the project. Finally, the PCU will propose and implement a complaints management mechanism that is conducive enough and considerate of vulnerable groups.</p>

3.4.2 World Bank Environment, Health, and Safety Guidelines (EHS)

The World Bank Group Environmental, Health and Safety Guidelines (EHSs) are technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP). In applying the EHS Guidelines, the proposed measures should be tailored to the hazards and risks identified for each specific subproject activity based on the results of an environmental assessment in which site- specific variables, such as host country context, assimilative capacity of the environment, and other project factors, are considered.

The following EHS of the World Bank will be relevant to this project:

Air emissions and ambient air quality: This guideline applies to facilities or projects that generate emissions of air at any stage of the project life cycle. It complements the industry-specific emissions guidance presented in the Industry Sector Environmental, Health, and Safety (EHS) Guidelines by providing information about common techniques for emissions management that may be applied to a range of industry sectors. This guideline provides an approach to the management of significant sources of emissions, including specific guidance for the assessment and monitoring of impacts. It is also intended to provide additional information on approaches to emissions management in projects located in areas of poor air quality, where it may be necessary to establish project-specific emissions standards. Feeder roads and small earth dams and dugouts rehabilitation to be undertaken under the project are expected to generate some level of dust. In the case of dugouts, dust generation may only be realized during the construction phase.

Hazardous material Management: These guidelines apply to projects that use, store, or handle any quantity of hazardous materials (Hazmats), defined as materials that represent a risk to human health, property, or the environment due to their physical or chemical characteristics. Hazmats can be classified according to the hazard as explosives; compressed gases, including toxic or flammable gases; flammable liquids; flammable solids; oxidizing substances; toxic materials; radioactive material; and corrosive substances. The potential use of chemical products like fuel, gas, etc. in the implementation of the Climate Change sub-project makes this guideline relevant to the project.

Waste Management: These guidelines apply to projects that generate, store, or handle any quantity of waste across a range of industry sectors. It is not intended to apply to projects or facilities where the primary business is the collection, transportation, treatment, or disposal of waste. Construction (road construction and rehabilitation) and domestic waste (from the numerous beneficiaries to be engaged) expected to be generated from various sites make this guideline relevant to the project's implementation.

Noise Management: This guideline addresses impacts of noise beyond the property boundary of the facilities or projects being implemented. Thus, it seeks to address the public health risks of noise generated from the project and not the occupational health risks. The use of the handheld compactor at both the feeder roads.

Occupational Health and Safety: This guideline provides guidance and examples of reasonable precautions to implement in managing principal risks to occupational health and safety. Although the focus is placed on the operational phase of projects, much of the guidance also applies to construction and decommissioning activities. Labor intensive public works at project sites, such as land clearing, excavation, hauling, etc. expose workers to occupational risks. The EHS Guidelines will help manage such risks.

Community Health and Safety: Specific guidelines provided under traffic safety, water quality and availability, disease prevention and construction and decommissioning presented in these guidelines are relevant to implementing sub-project activities such as feeder road and dugout canoe rehabilitation/construction. The project management should put in place appropriate measures to prevent COVID-19 from becoming a source of contamination or a vector for the spread of the virus by applying WHO and national guidelines reduce the spread of COVID-19 virus and other infectious diseases. Additionally, the project should put the mechanism to promote a healthy and safe environment for all, including beneficiaries.

3.4.3 Comparison of the Gambia's Regulations/ Policies and World Bank ESF

Table 6: Gap Analysis – Comparison of the Gambia's Regulations/ Policies and World Bank ESF for Handling Environmental and Social Risks

SCOPE/OBJECTIVE	DESCRIPTION OF BANK STANDARD	DESCRIPTION OF THE NATIONAL REGULATION	GAPS AND BRIDGING ACTIONS
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
<p>Identify, evaluate, and manage the project's environmental and social risks and impacts in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to:</p> <ul style="list-style-type: none"> • Anticipate and avoid risks and impacts • Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels • Once risks and impacts have been minimized or reduced, mitigate and • Where significant residual impacts remain, compensate for, or offset them, were technically and financially feasible. 	<p>The standard guides the assessment of the Project's potential environmental and social risks and impacts and address potential impacts through planning, monitoring, and mitigation hierarchy approach.</p>	<p>National Environmental Management Act, 1994 and the Environmental Assessment Regulations (EIA) of 2014 mandates that no developer shall commence a project which in the opinion of the Agency has or is likely to have adverse effects on the environment or public health unless, before the commencement, the project has been registered by the NEA and an environmental permit has been issued by the Agency in respect of the undertaking.</p>	<ul style="list-style-type: none"> - Although national legislation seeks to anticipate and mitigate/avoid risks and impacts, it does not fully address potential impacts considering the mitigation hierarchy approach, especially regarding social and gender issues particularly impacts on the vulnerable - The stakeholders at all levels, (national, regional and community) are consulted in the project preparatory stage through consultations to make them aware of project components and the roles they will play during implementation. - The capacities of the stakeholders particularly PCU staff and partners on world bank ESF will also be built at the early stage of project implementation to enable them to collaborate effectively in addressing this gap

Scope/Objective	Description of Bank Standard	Description of the National Regulation	Gaps and Bridging Actions
ESS2: Labor and Working Conditions			
<ul style="list-style-type: none"> • To promote safety and health at work, fair treatment, non-discrimination, and equal opportunity of project workers, including vulnerable workers such as women, persons with disabilities, children. • To prevent the use of all forms of forced labor and child labor. • To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. • To provide project workers with accessible means to raise workplace concerns. <p>OHS Hazard identification and right of employees to remove themselves from such workplaces without being punished.</p>	<p>Working age and migrant workers, contracted workers, and primary supply workers, as appropriate. It provides certain requirements that the project must meet in terms of working conditions, protection of the workforce (especially the prevention of all forms of forced and child labor), and provision of a grievance mechanism that addresses concerns on the project promptly and uses a transparent process that provides timely feedback to those concerned.</p> <p>Under ESS 2, GM will be put in place for project workers to report work situations that they believe are not safe or healthy and remove themselves from a work situation that they have reasonable justification to believe presents an imminent danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.</p>	<p>The Labor Act 2007 provides for the rights and duties of employers and workers, guarantees trade unions, the freedom of associations, and establishes Labor Commission to mediate and act in respect of all labor issues. The Labor Act provides for compensation payments to workers for personal injuries arising out of and in the course of their employment.</p> <p>Labor Act 2007 details the duties of persons employed. It is not part of the duties of persons employed to remove themselves from such unsafe working places.</p>	<p>Although the Labor Commission makes provision for anticipated labor-related complaints, workers' access to the Commission is challenging at the regional level because its office is in the Greater Banjul Area with no regional representation.</p> <p>It does not consider Project workers to have their Grievance Mechanism set up so they can lodge their complaints in a fair and transparent manner without fear of any reprisal, and with safe and ethical procedures for SEA/SH related complaints.</p> <p>At present, there is no law that requires employers to adopt anti-sexual harassment policies in The Gambia. Therefore, employers largely rely on ordinary internal disciplinary proceedings in handling sexual harassment at workplaces which are not ideal lasting solution to sexual harassment as they usually do not focus on the survivor.</p> <p>The law does not explicitly mandate workers to remove themselves from such unsafe working places and is also silent on reprisal. Gambian law also doesn't have protections related to sexual harassment. The project will follow ESS2 in this respect.</p> <p>The labor law in The Gambia does not specifically address work hour limits, overtime, rest periods or work schedules in general. The Gambia prohibits the employment of children under 16 years. There are strict penalties imposed for violation of these rules.</p>

Scope/Objective	Description of Bank Standard	Description of the National Regulation	Gaps and Bridging Actions
ESS3: Resource Efficiency and Pollution Prevention and Management			
<ul style="list-style-type: none"> To achieve the sustainable use of resources, including implementing measures that avoid or reduce pollution resulting from project activities and minimizing and managing the risks and impacts of pesticide use. 	<p>The ESS3 provides requirements for projects to achieve the sustainable use of resources, including energy, water, and raw materials, as well as implement measures that avoid or reduce pollution resulting from project activities. The standard places specific consideration on hazardous wastes or materials and air emissions (climate pollutants) given that the current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of present and future lives</p>	<ul style="list-style-type: none"> The NEMA mandates the NEA to enforce compliance with establishment of EIA regulations and procedures among companies and businesses in the planning and executing development projects, including existing projects. The Act also mandates the Agency to register and manage all pesticides to ensure that the approved ones are used. The Hazardous Chemicals and Pesticide Management Act, 1999 provides for the registration and use of pesticides and related matters. 	<p>The Legislation ensures that pollution is prevented, and measures are put in place by polluters through routine monitoring by regulatory agencies and institutions i.e., NEA, etc.</p>

Scope/Objective	Description of Bank Standard	Description of the National Regulation	Gaps and Bridging Actions
ESS4: Community Health and Safety			
<ul style="list-style-type: none"> • To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle • To promote quality, safety, and considerations relating to climate change in the design and construction of infrastructure, including dams. • To ensure that safeguarding personnel and property is carried out to avoid or minimize risks to the project-affected communities. 	<p>This standard recognizes that project activities, project equipment and infrastructure increase the exposure of project stakeholder communities to various health, safety and security risks and impacts and thus recommends that projects implement measures that avoid or limit the occurrence of such risks. It provides further requirements or guidelines on managing safety, including the need for projects to undertake safety assessment for each phase of the project, monitor incidents and accidents and preparing regular reports on such monitoring. ESS4 also guides emergency preparedness and response.</p>	<p>The Public Health Act provides for the prevention of disease, promotes, safeguards, and maintains and protects humans and animals' health and provides for related matters. The Act enjoins the provision of sanitary stations and facilities, destruction of vectors including mosquitoes, protection of water receptacles, and promoting environmental health and sanitation.</p>	<p>The Act does not consider the assessment of workplace safety. Additionally, no adequate measures are in place to deal with occurrences and emergencies.</p> <p>ESS3 provides the platform to engage with stakeholders. A Stakeholder Engagement Plan has been prepared and will be implemented prior to the start of project activities. Community needs concerning project activities will be assessed and necessary measures are taken. The project will take into consideration emergencies and COVID-19 Response Plan to guide project implementation on site.</p> <p>The provisions of ESS3 will apply</p>

Scope/Objective	Description of Bank Standard	Description of the National Regulation	Gaps and Bridging Actions
ESS 5: Land Acquisition, Restriction on Land use and Involuntary Resettlement			
This aims to avoid involuntary resettlement, forced eviction, and aims to mitigate unavoidable adverse social and economic impacts from the land acquisition or restrictions on land use	<p>-PAPs with the formal legal rights to land or assets have to be compensated for any losses.</p> <p>-PAPs who do not have formal legal rights to land or assets but have a claim to land or assets that is recognized under national law, including claims derived from customary or traditional tenure arrangements are eligible for compensation.</p> <p>- PAPs with no recognizable legal right or claim to land or assets are compensated for loss of non-land assets and provided with resettlement assistance.</p>	<p>Provides for compulsory acquisition of land for public purpose and subsequent payment of compensation but only provides for compensation of assets.</p> <p>-Recognizes only PAPs with legal title for compensation</p> <p>- Use of the legal system to address grievance/complaint</p> <p>-Squatters are not entitled to compensation.</p>	<p>Gaps:</p> <ul style="list-style-type: none"> - The rights of squatters are not recognized. - No requirement of GM to address grievances - No requirement to prepare RAP <p>To address these gaps, the ESS5 will apply. Including the project will adopt a Project-level GM.</p> <p>Judicial process will be available for grievances</p> <ul style="list-style-type: none"> - Provision of land for land compensation option
ESS8: Cultural Heritage			

<ul style="list-style-type: none"> • To protect cultural heritage from the adverse impacts of project activities and support its preservation. • To address cultural heritage as an integral aspect of sustainable development. • To promote meaningful consultation with stakeholders regarding cultural heritage. • To promote the equitable sharing of benefits from the use of cultural heritage. 	<p>This standard requires that the ESA considers direct, indirect, and cumulative risks and impacts on tangible or intangible cultural heritage.</p> <p>Impacts on cultural heritage are to be avoided and the mitigation hierarchy applied. A chance finds procedure will be designed to ensure that any encountered, previously unknown cultural heritage, is appropriately managed.</p>	<p>The Gambian Constitution (1997) as well as the <i>Act to establish a National Council for Arts and Culture, and to make provision for other matters connected therewith 1989</i>,²¹ recognizes culture as a necessary tool for national integration and development.</p> <p>(1) The State shall take steps to encourage the integration of appropriate customary values into the fabric of national life through formal and informal education and the conscious introduction of cultural dimensions to relevant aspects of national planning.</p> <p>(2) The State shall ensure that appropriate customary and cultural values are adapted and developed as an integral part of the growing needs of the society as a whole; and, that traditional practices which are injurious to the health and well-being of the person are abolished. (3) The State shall foster the development of Gambian culture.</p>	<p>The regulations and policies do not address cultural heritage as an integral part of sustainable development and promotion of equitable sharing of benefits</p> <p>ESS8 provides for the preparation of frameworks for managing biodiversity resources and cultural heritage in situations where these resources are likely to be adversely affected by project activities.</p> <p>The provisions of ESS 8 will apply.</p>
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Scope/Objective	Description of Bank Standard	Description of the National Regulation	Gaps and Bridging Actions
ESS10: Stakeholder Engagement and Information Disclosure			
<p>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, particularly project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance</p> <ul style="list-style-type: none"> • To promote and provide means for effective and inclusive engagement with project-affected parties on issues that could potentially affect them throughout the project life cycle. • To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. • To provide project- affected 	<p>The standard establishes a systematic approach to stakeholder engagement that helps the Borrower to identify stakeholders and build and maintain a constructive relationship with them; as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible, and appropriate manner and format.</p> <p>Stakeholder engagements are to commence as early as possible in the project development process and continue throughout the lifecycle of the Project.</p> <p>ESS 8 also provides for a grievance mechanism to receive and facilitate the resolution of concerns and grievances</p>	<ul style="list-style-type: none"> • The laws most relevant to stakeholder engagement are: • The 1997 Constitution recognizes the right to information for all citizens as a fundamental human right. To fully operationalize the right to information, people need to be effectively engaged and provided with information on issues that affect their lives. • The Access to Information Act, 2020 which was also passed into law in 2021 by the Gambian parliament • Gambia Environmental Assessment Regulations (2014) and National Environmental Management Act (NEMA), also consider stakeholder engagement to be an integral part of the Environmental Impact Assessment process. 	<p>The national laws do not give a clear procedure for information disclosure</p> <p>The acts do not include a GM for addressing complaints and grievances that the stakeholders may have in respect of the information provided.</p> <p>Stakeholder engagement is also a continuous activity throughout project implementation</p>

parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond and manage such.			
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3.5 Institutional framework

The following institutions will be involved in the implementation of the project:

Table 7. Institutions relevant to the Project

Institutions	Specific Responsibilities	Interested and roles in this Project Implementation	Level of Intervention
Ministry of Finance and Economic Affairs (MoFEA),	Supervision of implementation of ESMP and the contractor with its E&S specialists.	Follow up and supervision of the provisions of safeguards documents and recommendations of WB policies and Gambian laws.	During the life cycle of the Project
Ministry of Basic and Secondary Education (MoBSE)	Oversees the PCU and Education sector Policies and law of The Gambia.	Policy guidance Oversees the PCU management for implementing component 1 of the Project	During the lifecycle of the Project
Ministry of Higher Education, Research, Science & Technology (MoHERST),	Oversees project activities for component 2	Management for implementation of component 2	Throughout the project lifecycle
National Nutrition Agency (NaNA)	Oversees project activities for component 3	Management for implementation of component 3	Throughout the project lifecycle
Ministry of Gender, Children and Social Welfare	The Ministry is responsible for implementing government policy on all matters affecting the development and welfare of women, children and the vulnerable in society. Ministry will be part of the Grievance Resolution Committee (GRC) within the Grievance Mechanism to oversee issues related to SEA/SH. The Women's Bureau will train members of GRC on SEA/SH; and will play an active role in coordinating and overseeing the referrals and provision of services using its experience and ability to support survivors of GBV.	Ensures the rights women affected by the Project are protected; participates in sensitization on gender issues, including GBV, VAC, SEA, SH. Supports and guides the process during related grievances. Participates in sensitization on prevention and response to GBV, SEA/SH, VAC etc.	Throughout the project life cycle
National Environment Agency (NEA)	The NEA enforces the NEMA, 1994 and EIA Regulations 2014 including sub-project classification, approves environmental statements and monitors sub-project ESMPs, etc. This role could be delegated to a private entity, if necessary, in	Evaluation of the ESMP report Grant Environmental Approval for the Project Monitoring the project compliance with national environmental regulations during implementation.	Throughout the life cycle of the project

Institutions	Specific Responsibilities	Interested and roles in this Project Implementation	Level of Intervention
	consultation with the NEA.		
Ministry of Health	Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development. Local health facilities will potentially manage the Project's health and safety risks such as the impacts of air and water pollution on the populations; malaria and other water-borne diseases due to long-term inundation of rice fields	<p>Providing guidance on transmissible diseases (including COVID-19 and HIV/AIDS) to consider during sensitization.</p> <p>Promoting safe and healthy environments at project sites, including response to incidents of SEA/SH or VAC.</p>	During the lifecycle of the Project
Office of Governors	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

4 ENVIRONMENTAL AND SOCIAL BASELINE

The description and analysis of the baseline data of the projection intervention zone includes the biophysical and the human environment. This chapter therefore describes each of the environments (physical, biological, and human) according to the information available in the literature review, information from field visits, interviews with stakeholders and additional mapping (GIS) work.

4.1 BIOPHYSICAL_CHARACTERISTICS

4.1.1 Climate

The Gambia has a Sudano-Sahelian type of climate characterized by a distinct rainy and dry season - a long dry season from October to early June and a short rainy season from mid-June to early October²³. Monsoon circulation over West Africa, correlated to Sea Surface Temperature (SST) in the Gulf of Guinea and modulated by the strength and location of the African Easterly Jet (AEJ), determines the character of the unimodal rainy season lasting from June to October. Annual rainfall decreases roughly from South to North, with insignificant geographical differences in variability (Figure 1). Temperatures on the other hand increase with distance from the Atlantic coast. Seasonal Northeast trade winds, known as Harmattan, also have an associative relationship with atmospheric circulations and are notable for their chill factor, and significant amounts of dust picked up from the margins of the Sahara Desert

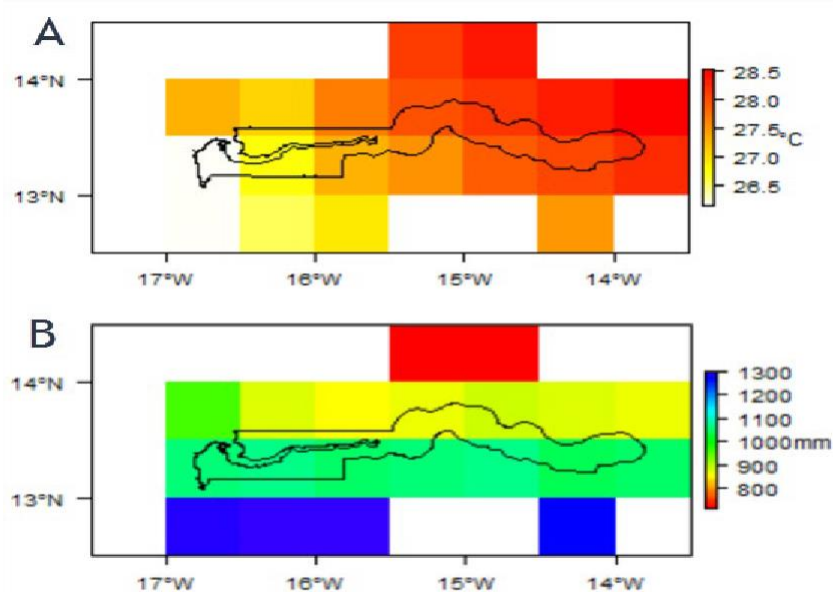


Figure 1 (A) The distribution of temperature in the Gambia (°C); and (B) The distribution of rainfall (mm per year).

4.1.2 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 Gambia lies entirely within the drainage basin of the Gambia River, a basin that extends well into Senegal and Guinea Conakry. 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 center 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.

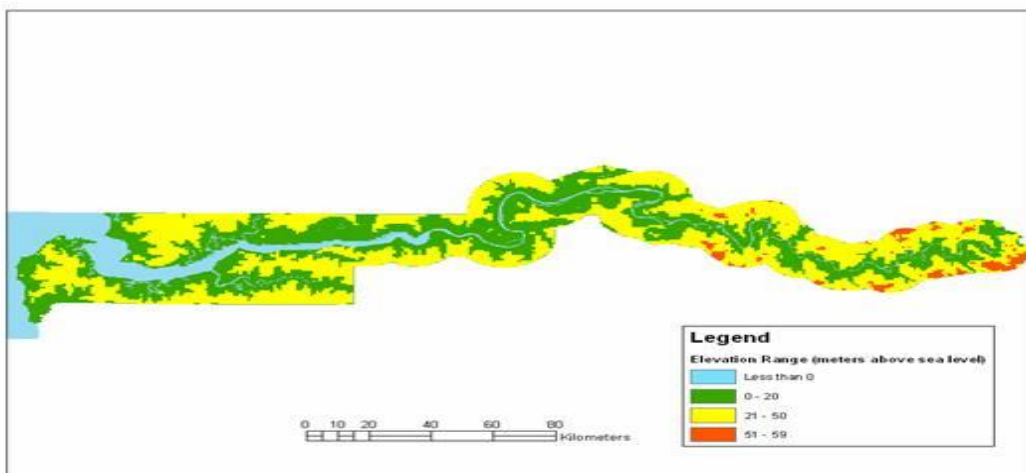
4.1.3 Topography

The geomorphology of The Gambia is characterized by the River Gambia and its floodplains, riverbanks and wetlands. The river originates in the Futa Jalon highlands in Guinea, to the southeast 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 seasonal 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 diversities 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 2).

Figure 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 meters 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 southwest of The Gambia, characterize the country's vegetation. Ground nut, millet, and sorghum are main crops cultivated in this region.

4.2 CHARACTERISTICS OF THE HUMAN ENVIRONMENT

4.2.1 DEMOGRAPHY

According to World Bank Systematic Country Diagnostic report for The Gambia (May 2020)¹⁴, the population of The Gambia is estimated to be 2.1 million people. The 2013 Population and Housing Census indicated a sex ratio of 97 males to every 100 females¹⁵. Regionally, the population of Kanifing is 382,096, 699,704 in WCR, 82,361, in NBR, 226,018 in CRR, and 239,916 in URR.

The Gambia has a youthful population, with 58% less than 24 years or within this age bracket.¹⁶ Among those ages, 52.4 percent are female while 47.6 percent are male. This trend is likely to continue due to a high fertility rate (nearly 5.67 children per woman in 2015) and a declining mortality rate. This has implications on the social and economic environment.

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 2020—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. Sustained high fertility has led to a large youth bulge. The youth age dependency ratio, defined as the number of young dependents (that is, population below the age of 15) relative to the working-age population, stands at 83.3 per 100 in 2018, the highest among SSA countries. The significance and pace of the youth population's growth—with the median age of the population standing at just under 20 years—poses challenges to the budgets for health, education, and social services. However, these demographic trends could yield a dividend if social and economic policies can ensure human capital accumulation for the young population (Canning et al. 2015).¹⁷ Nationally, ethnicity is composed of mainly eight officially recognized groups; Mandinka (36%), Fulani (22%), Wolof (15%), Jola (11%), Sarahuley (8%), Serer (2.5%), Manjago (1.7%), Aku (0.8%) and others 4% (GBoS, 2003). Approximately 95.7% of the population is Muslim, most of whom are Sunni. The Christian community makes up 4.2 percent of the population, the majority Roman Catholics. Religious groups that together constitute less than 1 percent of the population include Ahmadi Muslims, Baha'is, Hindus, and traditional African religion.¹⁸

4.3 BASIC SOCIAL SERVICES

4.3.1 ACCESS TO HEALTH SERVICES

Despite the earlier achievements in the health sector which include high immunization coverage with the majority (83.2 percent) of children ages 12–23 months fully vaccinated with basic antigens, The Gambia continues to experience significant challenges in the sector resulting in the erosion of some of the achievements. Under-5 and neonatal mortality levels increasing since 2013. Under-5 mortality has slightly increased from 54 to 56 deaths per 1,000 live births. Infant mortality has increased from 34 to 42 deaths per 1,000 live births. Neonatal mortality has increased, from 22 to 29 deaths per 1,000 live births. Child mortality (deaths to children between ages 1 and 5) decreased slightly from 20 to 15 deaths per 1,000 live births.¹⁹

In terms of the availability of health services, most Gambians have relatively high access to facilities, but types

¹⁴ <http://hdl.handle.net/10986/33810>

¹⁵ Gambia Bureau of Statistics (GBoS). 2013. The Gambia Population and Housing Census, Gender Report, Banjul, The Gambia: GBoS.

¹⁶ Ibid.

¹⁷ The Gambia Systematic Country Diagnostic (SCD). World Bank: Washington, DC, 2020.

<https://openknowledge.worldbank.org/bitstream/handle/10986/33810/The-Gambia-Systematic-Country-Diagnostic.pdf?sequence=1&isAllowed=y>

¹⁸ US DEPARTMENT OF STATE, "2019 REPORT ON INTERNATIONAL RELIGIOUS FREEDOM: THE GAMBIA" <https://www.state.gov/reports/2019-report-on-international-religious-freedom/the-gambia/#:~:text=APPROXIMATELY%2095.7%20PERCENT%20OF%20THE,%2C%20HINDUS%2C%20AND%20ECKANKAR%20MEMBERS>

¹⁹ The Gambia 2019-20 Demographic and Health Survey Summary Report Gambia Bureau of Statistics (GBoS) 2021

of facilities are unevenly distributed (GBoS 2017a). At national level approximately 88 percent of people report living within 30 minutes of a health facility, which represents a high level of accessibility. In the urban areas 74 percent of urban residents have access to health facilities as opposed to 33 per cent of rural residents. Affordability and time to travel to health facilities constitute major constraints.

The main constraints in the sector include low funding, high poverty levels resulting to the high prevalence of communicable and non-communicable diseases such as Malaria, Diarrhea, etc. Most of these diseases are easily preventable if appropriate environmental and lifestyle measures are taken, with more attention paid to development of health promotion and prevention actions than merely focusing on curative care alone. Other constraints include weak health information system; shortage of adequately and appropriately trained health staff; high attrition rate and lack of efficient and effective referral system.²⁰

4.3.2 EDUCATION

Access to education is lower in The Gambia than the SSA average across all levels of education and most categories, and access rates to primary education stagnated between 2010 and 2015²¹. The gross enrollment ratio (GER) marginally decreased from 90 percent to 87 percent, compared to the SSA average of 102 percent. The rate of primary-school-age children who were out of school (7–12 years) increased from 27 percent to 30 percent. This represents about 100,000 out-of-school children, 95 percent of whom never went to school, and the remaining 5 percent dropped out of the system.

Access to secondary schooling is even lower, with a GER of 62 percent in the upper basic school (UBS) and 44 percent in the senior secondary school (SSS). The out-of-school rate for UBS is high at 30 percent, with 80 percent of the children having never attended school. The rate is even higher for SSS (43 percent). Access to the postsecondary school is 7 percent, lower than the SSA average of 10 percent. However, gender parity indices at the preschool, primary, and secondary levels have been met, though it falls short at the tertiary level.²²

There are disparities in terms of access to education in the different project affected areas. For example, in the more urbanized region of the West Coast Region access is higher than in the provinces (more rural) like URR, NBR, CRR. In addition, there are also gender disparities with girls with higher education attainment in urban areas than in rural areas.

4.4 The Ministry for Lands, Regional Governments and Religious Affairs

The Ministry for Lands, Regional Governments and Religious Affairs is the main government agency responsible for the land administration in The Gambia with its two key technical departments: the Department of Lands and Surveys, and the Department of Physical Planning and Housing. The former is responsible for the survey, mapping and demarcation of national and international boundaries and government layouts, whereas the latter is responsible for ensuring the rational and equitable utilization of the available land resources.

The main acts relating to land administration are:

- The Constitution of the Second Republic of The Gambia, *adopted on 8 August 1996, entered into force in January 1997, last amended in 2007*
- the Lands (Regions) Act 1991, which covers land in the provinces
- the State Lands Act 1991, which covers Banjul, the entire Kombo St. Mary as well the Districts of Kombo North, South and Central in the West Coast Region
- the Physical Planning and Control Act 1991
- the Surveys Act 1991

²⁰National Health Policy- 2012 – 2020: Ministry of Health and Social Welfare.

²¹ The Gambia Systematic Country Diagnostic (SCD). (2020) World Bank: Washington, DC.

²² Ibid.

- Local Government Act, 2002
- The Survey Act, 1991
- Land Use Regulations, 1995
- Lands Commission Act, 2007
- State Lands Regulations, 1995
- Development Control Regulations, 1995

4.4.1 Land tenure in the Gambia (i.e., both the provinces and the state land areas) fall under four main categories:

- i. **Customary or traditional tenure** is an interest or title, which a member of the larger community acquires in the communal land. It is an interest, which is held as of right by virtue of being a member of the community. The member who holds such interest has the right of beneficial occupation, unfettered use (subject to the laws of the country). Upon death, the interest devolves on his/her successors in title ad infinitum. This form of tenure is mostly prevalent in the provinces.
- ii. **State owned lands are public lands**, specifically acquired by the government under an appropriate enactment using the state powers of eminent domain. Currently the relevant legal instrument is the State Lands Act of 1991, which provides for the compulsory acquisition for public purposes or in the public interest. Under such ownership, the rights become vested in the government, which can then proceed to dispose of the lands by way of leases, certificate of allocations etc. to the relevant beneficiary state institutions as well as private individuals and organizations.
- iii. **Leasehold tenure** involves the execution of a lease between individual(s) and the Government/ District Authority for a period of 21 years for Provincial lands and 99 years in the state lands area. The grantor may impose various terms and conditions including the payment of rent as consideration for the grant.
- iv. **Free hold tenure** is the highest form of ownership with no term limits, and it is only created by express grant from the Government. It is a rare form of tenure that confers absolute ownership of the land, and it exists mainly in Banjul and the immediate suburbs.

The Land Tenure System in The Gambia is complex and sensitive. The typical tenure system is communal in most communities; however, this kind of ownership can result in land fragmentation which does not support large-scale investment in production.

The land tenure system in The Gambia is generally based on a dual system due principally to the colonial past, which introduced the statutory title in addition to customary tenure.⁴⁵

The State system governs the freehold and leasehold titles introduced by the British and are based on English law. Freehold and leasehold are most prevalent in the Banjul and Kombo St. Mary Region, while customary tenure is most common in the provinces. The different statutory instruments regulating statutory land ownership are the State Lands Act ,1991 and the Lands (Regions) Act, 1991.

The State Land Act grants leases up to 99 years in areas where the statute is applicable (Greater Banjul Area). On the other hand, the Lands (Region Act) provides for the proper upkeep of lands in the regions for public goods and accords the Minister Powers to designate lands in any part of the provinces as state lands.

The customary land tenure system, on the other hand, is based purely on the traditional system of ownership, which is entirely dictated by the customs and traditions of the people. According to customary laws, where an original piece of land is cleared by a Kabilo (a collection of families) the ownership of land is vested in the head of the Kabilo. This is the basis of the customary land tenure system, which has evolved. Customary land tenure

exists mainly in rural areas. The women are particularly discriminated against by the customary laws, which is male-dominated, and this is common in the entire rural Gambia.

Land has been recognized as the second most common source of conflict and instability in the Gambia. Land conflicts are a key driver of fragility, and poor land governance drives land conflicts (2021 Risk and Resilience Assessment, RRA).

- **Gender-Unequal Inheritance Rights:** The Constitution recognizes women's inheritance rights as granted under personal law, and it specifically recognizes customary practices as an exception to its definition of discrimination (LGAF 2013). Since females can only inherit 50 percent of the portion of a male's share of the estate under Shariah law, and more than 90 percent of the population is Muslim, women's inheritance rights are legally unequal to men's rights for the vast majority of the population. The continued practice of polygamous marriage further reduces women's inheritance claims under Shariah law: in the case of a man with four wives (permitted under Shariah law), each wife could receive just 12 percent of his land.

⁴⁵ "Improving Land Sector Governance in The Gambia: Implementation of the Land Governance Assessment Framework (LGAF)" (Aug. 2013)
<https://openknowledge.worldbank.org/bitstream/handle/10986/28522/119603-WP-P095390-PUBLIC-7-9-2017-9-52-5-GambiaFinalReport.pdf?sequence=1&isAllowed=y>

Moreover, customary law and practice also discriminate against women, including in urban areas; by custom, women only inherit customary land that they own individually, which is rare in practice. Women's unequal inheritance rights restrict their access to land, especially in rural areas, where land rights are often transferred through inheritance rather than landmarkets.

In terms of women and land ownership, generally, cultural norms and customs have marginalized women in decision-making and limited their access to land ownership largely due land use and the men make tenure rights, which favor men since important decisions relating to land including inheritance and ownership. Furthermore, according to sharia law, which is applicable to inheritance among Muslim families (which are overwhelmingly predominant in the project intervention area), the female heirs receive only half (50%) of the inherited assets compared to their male siblings.

Barriers exist for women in accessing land under customary title/ traditional arrangement. Women's rights on land, as they relate to customary tenure, are restrictive. Whilst this does not pose any problems in State Lands (where land is owned by and administered directly by the State), it is a major obstacle with respect to customary land. The Constitution recognizes customary practices as an important basis for customary Tenure thereby posing an obstacle to the legal equality of women and thus reinforcing customary practices that deny women ownership and control over land.

In the project area, the land tenure is a mix with traditional/ customary tenure existing side by side with leaseholds. However, the majority of the holdings are customary with the certificate of occupancy issued by the Alkali.

4.4.2 Inequality in the labor force

Women have unequal access to formal employment and income-generating opportunities in The Gambia, as well as unequal access to credit and financing to build a small business, and unequal access for training and labor skills development (see Annex 3).

Labor force participation in the country among women is low and reduces the growth potential of the economy. In urban labor markets, female participation is only 37 percent compared to 70 percent for men (SCD, May 2020).

4.5 Gender Based Violence

Acceptability of violence against women and girls remains high, with 55 percent of women justifying intimate partner violence in some circumstances. Harmful social and gender norms, beliefs and behaviors contribute to discrimination of women and girls to a high prevalence of GBV, with 46% of women aged 15-49 having experienced physical violence at least once in their lifetime and 41 percent having experiences intimate partner violence (IPV).

Additionally, social norms limit women's access to opportunities and decision making, with less than a third of married women participating in the decision-making either alone or jointly with their partner, regarding their own health care, major household expenses or social interactions (DHS, 2019-20).

5 POTENTIAL ENVIRONMENTAL AND SOCIAL (ESS) RISKS AND IMPACTS AND MITIGATION MEASURES

5.1 ESS Risks and Impacts & mitigation measures for Construction and/or rehabilitation of TVET Centers of Excellence (Under Component 2)

Component 2 might generate potential adverse environmental effects of the Project:

Increase access to labor-market relevant TVET programs. The main negatives impacts/risks are likely to be related to the implementation and management of (a) construction and/or rehabilitation of TVET Centers of Excellence activities, which would have impacts on population health and on the environment.

Negative impacts mainly relate to environmental and social aspects and are linked to land acquisition and restriction to land, resource efficiency and pollution prevention (water, air and soil pollution, soil erosion, loss of biodiversity and habitats, energy and water consumption), labor and working conditions (health and occupational hazards), GBV focusing on Sexual Harassment/ Sexual Exploitation and Abuse (SH/SEA).

Table 8 Potential Environmental and Social (ESS) and Mitigation Measures for component 2

Potential E&S impact assessment	Mitigation measures and ESS tools
<p>IN THE PRE-CONSTRUCTION PHASE</p> <p>-Poorly designed of the school (construction/rehabilitation) mostly inherent to the Universal access principles in physical design: Indeed, there is risk that poor design quality will result in the exclusion of persons with disabilities from being able to attend school and participate in learning opportunities. Restrictive physical design of facilities may prevent persons with disabilities from attending. In the event of emergency, physical designs and emergency response plans also need to factor in the safety and ease of egress for persons with disabilities.</p> <p>-During the preparation of bidding documents, the main risks would be the neglect of environmental and social aspects and their low consideration premised on the assertion that there would be minor renovation works for the project that could easily be mitigated.</p> <p>Selection of contractors with poor environmental and social records will have adverse consequences on the E&S performance of the works.</p> <p>The siting of rehabilitation, if not carefully planned and agreed upon with stakeholders will lead to underutilization of the infrastructure and high rehabilitation cost when completed.</p>	<ul style="list-style-type: none"> - Use of the reference ESS tools applied to all relevant project phases, mainly: <ul style="list-style-type: none"> - ESMF - ESMP - C-ESMP - Grievance Redress Mechanisms (GRM) - Stakeholder Engagement Plan (SEP) - Labor Management Procedures (LMP) - Sexual Exploitation and Abuse/Sexual Harassment Action Plan (SEASHAP) - ESCP - Systematically apply ESS screening, review, management and implementation process (Screening against exclusion/eligibility, avoiding of high and substantial E&S risk subproject, preparation of ESMP and Contractor's ESMP if needed for moderate subproject) - It is important therefore that the project selects good contractors with good environmental and social performance records demonstrated by their ESHS Policies, competence of staff, accident rate, etc. - In the new and rehabilitated school design consider: a nearly zero-emission building (nZEB) standards, using solar panels (to be sourced from regional markets and screened

Potential E&S impact assessment	Mitigation measures and ESS tools
<p>Poorly consideration of the energy sustainability into the design of the schools and other facilities as well during construction and operation will cause an inefficient use of energy which will result in GHG (Green House Gas) emission and increased cost of energy.</p>	<p>for supply chain concerns) for producing electricity and high standard insulation materials in order to reduce the operational cost of the buildings and protect the environment.</p> <ul style="list-style-type: none"> - Activities under the project will be screened for potential impacts including access restrictions on known heritage buildings and sites, practices, and relevant national requirements for protection of these sites will be applied including chance find procedures. - If the case will be, the resource efficiency provisions under the present project shall comply with the approach on Resource Efficiency for Public buildings, promoted in the Republic of Moldova starting with beginning of 2000. Buildings are responsible for over 45% of total energy consumption and are important sources of greenhouse gas / GHG pollutants. For the Republic of Moldova, the energy efficiency can be achieved through the adoption and application of the concrete programs of thermal energy rehabilitation of buildings and modernization of their installations.
<p>IN THE CONSTRUCTION PHASE:</p> <p>a) Occupational Health and safety risks: Safety hazards can occur due to violation of proper health and safety practices and may lead to injuries and accidents. Workers are exposed to accident or injury or illness due to repetitive exposure to a mechanical action or work activity. Single exposure to physical hazards may result in a wide range of injuries, from minor and medical aid only, to disabling, catastrophic, and/or fatal. Multiple exposures over prolonged periods can result in disabling injuries of comparable significance and consequence.</p> <p>Community Health and Safety Risks: During the renovation or construction process, (excavation of trenches on site etc.) the general public will be at risk of accidental falls, being hit by falling objects or cuts. These accidents can cause injuries and fatalities. Trucks supplying materials to the site may also be involved in accidents. If the COVID-19 pandemic still pertains, there could be potential transmissions from construction</p>	<p>Personal protective equipment will be applied during implementation of works. In case the works include removal of roof tiles made of asbestos-containing material, the works will be implemented by trained personal using specialized personal protective equipment</p> <p>Managing noise, vibration, and emissions. Dust-depressing measures aimed at prevention of air pollution through watering of access roads and construction sites will be implemented. Water sprinkling during construction will alleviate dust impacts.</p>

Potential E&S impact assessment	Mitigation measures and ESS tools
<p>workers to community members and vice versa including teachers and students.</p> <p>Such incidents can further heighten tensions between contractors and community members. Noise, vibration, and emissions will be generated in the course of the transportation of construction materials and truck traffic. Emission of inorganic dust from digging loading works and emission of harmful substances and dust from combustion of diesel used by transportation means and machinery occur during the construction works. Additional hazards can occur if renovation works are implemented during teaching process or at a time when youth can access the building and premises.</p> <p>Incidence of Gender Based Violence/Sexual Exploitation Abuse and Harassment</p> <p>Direct project workers and employees of contractors and subcontractors may be involved in sexual harassment and rape. Other forms of gender-based violence and discriminatory practices that may occur during project implementation include employers and supervisors requesting for sexual favors as a pre-requisite for employment opportunities at the workplace.</p> <p>Workers may also be engaged in issuing threats, insults, assault and other forms of abuse on girls, women, children and other vulnerable groups. Acts of Gender Base Violence have long term physical health and psychological effects on survivors.</p> <p>Although the project does not target children as beneficiaries, the surge in economic activities by the project may create opportunities for children to engage in age-inappropriate or hazardous work.</p> <p>Labour Influx: It is likely that ongoing rehabilitation and construction works will attract food vendors and petty traders to the construction area. Waste from such commodities might pollute the area if appropriate dump bins are not provided for collection and onward disposal at approved dumping sites. No work camp will be constructed and therefore, the project does not envisage accommodation of workers at the construction sites.</p>	<p>Dust and noise from the construction site will be minimized by using closed/covered trucks for transportation of construction materials and debris. To minimize impacts on nearby residents the vehicles will be equipped with exhaust mufflers and regularly inspected to ensure their proper technical condition. In addition, implementation of renovation works will be carried out only during daytime hours.</p> <ul style="list-style-type: none"> - Contractual Clauses on mandatory and regular training for workers on required lawful conduct and legal consequences for failure to comply with laws on non-discrimination and GBV will be inserted in Contract Documents. - Contractual Clauses with a commitment to cooperate with law enforcement agencies investigating cases of gender-based violence shall be inserted into the Contract documents of the contractor and Supervising Consultant - The Contractor shall be required to consider alternative work schedules or shifts to accommodate the hiring of more female workers. <p>Workers on site will sign Code of Conduct with sanctions on rape defilement, abuse and other gender-based violence</p> <p>Prohibition posters on sexual exploitation and harassment will be posted in and around the site.</p> <p>Sensitize parents on the prohibition of child labor</p> <p>Sensitization workshops shall be undertaken for employees of the Contractor/Supervising Consultant and Sub-Contractors as well as persons working or living in the immediate project environs.</p> <p>The Contractor shall provide contact numbers of the nearest law enforcement Agency Office, the</p>

Potential E&S impact assessment	Mitigation measures and ESS tools
<p>Risk on Cultural heritage: Damages to known and unknown archaeological sites, buildings and objects: The risk on culture heritage is maintained and mentioned for preventives measures.</p>	<p>Grievance Redress Committee Members and GBV Service Providers to offices, schools and clinics within the project zone.</p> <p>Sub-projects will be screened for potential impacts on known heritage sites and practices and those having impacts on cultural heritage will not be eligible for the Project support. Also, the Chance Find Procedures outlined in this ESMF should be included in site-specific ESMPs for all earth-moving sub-projects.</p> <p>Ensure that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted, officials contacted, and works activities delayed or modified to account for such finds. If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notify and obtain approval/permits from local authorities and address all construction activities in line with local and national legislation. Project Contractors are also required to retain the services of appropriately registered archaeologists to oversee and assess works in the event of an unexpected discovery.</p>

5.2 Table 9 ESS Risks and Impacts & mitigation measures for other components (1,3,4 and 5)

Potential E&S impact assessment	Mitigation measures
<p>Universal access principles in physical design: There is risk that poor design quality will result in the exclusion of persons with disabilities from being able to attend school and participate in learning opportunities. Restrictive physical design of facilities may prevent persons with disabilities from attending. In the event of emergency, physical designs and emergency response plans also need to factor in the safety and ease of egress for persons with disabilities.</p> <p>Universal access/equal opportunity in pedagogy: Disabled and other vulnerable students may also be restricted from accessing learning activities inside the classroom if customized teaching methods and tolerance of error are not applied.</p>	<ul style="list-style-type: none"> - Use of the reference ESS tools, mainly: - Stakeholder Engagement Plan (SEP) - ESMF - Grievance Redress Mechanisms (GRM) - Labor Management Procedures (LMP) - Sexual Exploitation and Abuse/Sexual Harassment Action Plan (SEASHAP) <p>Curricula development and training of teachers for universal access/equal opportunity in Education include CoC to prevent and manage incidents of SEA/SH and risk of violence against children.</p>

<p>Poor consideration of vulnerable groups views and needs.</p> <p>Reputational risk in failing to better managed and promote equal opportunity and rights to education and involve teacher training that promotes inclusion through non-discrimination against ethnicity, anti-bullying and emotional skills.</p> <p>Labor relations: promote and pilot alternative teacher motivation mechanism to attract younger teachers, may also come with risk of industrial dispute with older teachers who currently dominate multiple roles and consider younger teachers as challengers. A well-functioning grievance mechanism and engagement with teacher associations.</p>	<p>-Universal access will be considered in the physical design of facilities to minimize the need for physical exertion and also to ensure safety of students with disabilities in the event of emergency and in the regular use of facilities.</p> <p>-CoCs to prevent violence, mistreatment or discrimination being caused or exacerbated by the range of stakeholders working on the project activities.</p> <p>-Social protection risks: Special measures would need to be taken to ensure the privacy, security and safety of children with disabilities.</p> <p>-Use a Stakeholder Engagement Plan (SEP) as a reference tool to engage the key project stakeholders including but not limited to the teachers and parents in a consultative and participative process.</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project.</p> <p>The LMP will review and describe any measures required to enhance the existing dispute resolution mechanism specific to education worker (teachers. School administrator...)</p>
<p>Incidence of Gender Based Violence/Sexual Exploitation Abuse and Harassment</p> <p>Direct project workers and employees of contractors and subcontractors may be involved in sexual harassment and rape. Other forms of gender-based violence and discriminatory practices that may occur during project implementation include employers and supervisors requesting for sexual favors as a pre-requisite for employment opportunities at the workplace.</p> <p>Workers may also be engaged in issuing threats, insults, assault and other forms of abuse on girls, women, children and other vulnerable groups. Acts of Gender Base Violence have long term physical health and psychological effects on survivors.</p> <p>Although the project does not target children as beneficiaries, the surge in economic activities by the project may create opportunities for children</p>	<p>Contractual Clauses on mandatory and regular training for workers on required lawful conduct and legal consequences for failure to comply with laws on non-discrimination and GBV will be inserted in Contract Documents.</p> <p>Contractual Clauses with a commitment to cooperate with law enforcement agencies investigating cases of gender-based violence shall be inserted into the Contract documents of the contractor and Supervising Consultant</p> <p>The Contractor shall be required to consider alternative work schedules or shifts to accommodate the hiring of more female workers.</p> <p>Contractual clauses against rape, defilement and other Gender based Violence as well as child and forced Labor shall be inserted into the contract of the Contractor and Supervising Consultant</p> <p>Workers on site will sign Code of Conduct with sanctions on rape defilement, abuse and other gender-based violence</p> <p>-Sensitization workshops shall be undertaken for employees of the Contractor/Supervising Consultant and Sub-Contractors as well as persons working or living in the immediate project environs</p>

<p>to engage in age-inappropriate or hazardous work.</p>	<ul style="list-style-type: none"> -The Contractor shall provide contact numbers of the nearest law enforcement Agency Office, the Grievance Redress Committee Members and GBV Service Providers to offices, schools and clinics within the project zone. -Prohibition posters on sexual exploitation and harassment will be posted in and around the site. -Sensitize parents on the prohibition of child labor
<p>Component 5 specific activities and sites under CERC are unknown at this stage Therefore, CERC environmental and social impacts will be assessed prior activation. Nevertheless, previous CERC activation shown the proposed works and other activities are mostly small-scale works. The potential negative impacts are expected to be minimal, localized, and temporary that can be mitigated through the implementation of the existing safeguards instruments of the Project and close supervision by the Project Engineer or Supervision Consultant.</p>	<ul style="list-style-type: none"> • CERC ESMF or addendum to existing ESMF

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

This section presents the major guidelines for the environmental and social management of the project, considering the requirements of the Gambia's environmental legislation and the requirements of the World Bank's Environmental and Social Standards. These guidelines include the screening process, the development of environmental and social requirements (ESMP), capacity building for ESMP implementation, periodic reporting on ESMP implementation, and periodic monitoring of environmental and social implementation. The ESMP will be included in the project Implementation Manual.

6.1 Objectives of the Environmental and Social Management Plan

The objective of the ESMP is to describe the institutional mechanisms:

- i* describing the environmental screening process to identify potential environmental and social impacts of project activities and the implementation of proposed mitigation measures
- ii* periodic monitoring of the implementation of environmental and social measures
- iii* capacity building for ESMP implementation
- iv* related cost estimates and timelines; and
- v* periodic reporting on ESMP implementation

6.2 Environmental and Social Analysis and Screening Process and Responsibilities for Implementation of Subprojects

The Project will comprise several investments/sub-projects, generally of medium to high magnitude, which will be identified, prepared, and implemented during the life of the project. To be accepted, these sub-projects will have to comply with both the World Bank's environmental and social standards and the Gambia's national procedures. For this purpose, the subprojects will have to go through a screening process to determine the potential environmental and social risks of the subproject activity. The screening process is based on the national laws and the requirements of the World Bank.

The environmental and social screening of a project consists of identifying, describing, and characterizing the potential positive and negative environmental and social impacts that may be generated during the pre-construction phase, the construction phase, and the operation phase of the project. The screening determines what type of socio-environmental assessment mitigation measures are required and the appropriate instruments to be used, if any, given the types of activities planned.

The different stages of the environmental and social screening process are identified in the following paragraphs. The extent of the environmental and social measures required for the activities will depend on the outcome of the screening process, which aims to:

- (i) determine which activities are likely to have adverse environmental and social impacts;
- (ii) determine appropriate mitigation measures for activities with adverse impacts; (iii) identify activities requiring separate ESIA's;
- (iii) describe the institutional responsibilities for analysis and approval of screening results, implementation of proposed mitigation measures, and preparation of separate ESIA reports;
- (iv) monitor environmental parameters during infrastructure construction and subsequent operation and maintenance;
- (v) identify activities that may involve land acquisition.

The national environmental legislation categorizes projects according to the scale of the anticipated impacts: (i) Category A when a full EIA study is required; (ii) Category B when limited Environmental

Study (Preliminary Environmental Impact Assessment) is necessary; (iii) Category C when the project does not require an EIA although approval may be with conditions.

To comply with the requirements of the World Bank's environmental and social standards and national legislation, the screening of sub-projects should include the following steps

- Identification of project activities likely to have negative environmental and social impacts
- Identification of activities requiring ESIA/ESMP requirements
- Development of appropriate mitigation measures
- Description of institutional responsibilities for (i) analysis and approval of screening results, implementation of proposed mitigation measures, and preparation of ESIA/ESMP reports, (ii) monitoring of environmental indicators.

Thus, to make the environmental and social risk management effective, the responsibilities in the execution of each stage of the environmental and social management of the sub-projects are assigned to the stakeholders. Also, this sharing of roles was guided by the administrative organization of the structures responsible for the environment in The Gambia. The Ministry of the Environment has a central NEA that is responsible for the environmental assessment process.

The environmental and social screening process to determine the nature of the environmental measures to be considered includes the following steps:

Step 1: Completion of the environmental and social selection form

Step 01 requires that each project to be financed by the World Bank require an environmental and social screening to determine the type of environmental assessment instruments that may be used. All sub-projects will be screened to determine the extent of their foreseeable environmental and social risks and to define the required documentation. An Environmental and Social Screening Form will be completed (See Annex 5). This form will assess the nature of the sub-project, the scope and level of potential environmental and social risks (high, substantial, moderate, or low risk), as well as the characteristics of the proposed works/developments, their potential environmental and social risks, or impacts. The E&S screening process report will be submitted to the World Bank for validation of the result regarding sub-project risk rating as well as proposed E&S due diligence to be conducted.

The environmental and social experts of the PCU in collaboration with the NEA will do the filling of the initial selection form. In this filling process, the local communities will take an active part in the collection and analysis of the information. In addition to potential environmental and social impacts, the screening results will also indicate: (i) the need for the land acquisition as well as physical and/or economic displacement; and (ii) the type of public consultations that were conducted during the screening exercise.

To comply with the requirements of the World Bank's Environmental and Social Framework, the Project's activities likely to have direct or indirect impacts on the environment be classified into four categories:

- **High risk:** Investments/sub-projects are likely to have significant environmental impacts. An environmental impact assessment study will help integrate environmental considerations into the economic and financial analysis of the project. This category requires a thorough environmental assessment with an Environmental and Social Management Plan (ESMP). In addition, in the event of physical or economic displacement, the ESIA/ESMP will be supplemented by a Resettlement Action Plan (RAP). *These subprojects require a detailed impact study accompanied, if necessary, by a Resettlement Action Plan, or other E&S instruments as required under the assessment.*
- **Substantial risk:** investments/subprojects with significant environmental and social impacts and risks that are reversible based on the implementation of avoidance and/or mitigation measures. An in-depth impact assessment will therefore be required to evaluate the impacts and propose

management measures. In addition, in the event of physical or economic displacement, the ESIA/ESMP will be supplemented by a Resettlement Action Plan (RAP). Consequently, the specifications of the contractors responsible for the works, if any, will imperatively contain all the technical devices and mitigation measures planned, as well as a monitoring and control system that respect the standards in force (including the safety of workers and local populations). *Under national regulations, these projects require a detailed impact study and, if necessary, a Resettlement Action Plan or other E&S instruments as required under the assessment.*

- **Moderate risk:** the investments/subprojects have limited environmental impacts, or the impacts can be mitigated by applying measures or changes in their design. *Under national regulations, these sub-projects can have easily identifiable and limited impacts and the means of mitigation are generally known. These require Environmental and Social Impact Assessment proportional to risk.*

- **Low risk:** investments/subprojects that do not require an environmental and social study. *This category is equivalent to low-risk sub-projects with minor negative impacts on the biophysical and human environment as defined by national legislation, which nevertheless requires them to be declared and risks/impacts to be mitigated in an ESMP.* It should be noted that the Project has been classified as a substantial risk by the World Bank in view of the nature of the activities it may require and their sensitivity, which corresponds to category A according to national legislation. In this respect, the results of the selection should lead to sub-projects with substantial, moderate, or low risk.

Any sub-project with a high-risk rating will request, before being implemented, further clearance by the WB as this will induce a change in the overall project risk rating and the update of the ESCP.

Step 2: Validation of the selection and environmental and social classification of activities

The Environmental specialist of the PCU will forward the initial completed screening forms to the NEA for approval. Thus, the project Environmental and Social specialists will work closely with the NEA to ensure the analysis of the information contained in the forms. After analyzing the information contained in the screening results and determining the extent of environmental work required, the Environmental and Social specialists the Project implementation Unit (PCU) in close collaboration with NEA will make a recommendation as to whether: (a) environmental work will not be required; (b) application of environmental and social requirements will suffice; or (c) an ESIA should be conducted.⁴⁸

Step 3: Carrying out the environmental and social "work"

When an ESIA is required

When an environmental and social assessment (ESIA) including an Environmental and Social Management Plan (ESMP) is required, the Environmental and Social Safeguards Manager of the Project Implementation Unit (PCU) will perform the following activities:

- The Environmental and social specialists of the PCU will prepare the Terms of Reference for the Environmental and Social Assessment and submit to the NEA for review and approval and to the Bank for No Objection. In accordance with national legislation, the NEA will notify the Project Implementation Unit (PCU) of amendments to the TOR based on comments or their validation. The Project Coordination Unit may be requested to supplement information. The model TOR for a standard Environmental and Social Assessment (ESIA) is in Annex 6)
- Recruitment of qualified consultants to conduct the required Environmental and Social Assessments
- Conducting the stakeholder engagement as per the Stakeholder Engagement Plan (prepared separately)

- Preparation of ESIA/ESMP reports by the consultants

Any investment/subproject whose implementation results in involuntary physical, economic, or access restriction displacement is required to develop a Resettlement Plan (RP), the level of detail of which depends on the number of people affected. The procedure in this case is specified in the RPC.

When an environmental and social study is not required

In this case, the investment/subproject will be subject to environmental and social requirements (ES&S), so the Environmental and Social Safeguards Officer of the Project Implementation Unit (PCU) will consult the ESMC and the mitigation checklist to select appropriate mitigation measures.

Step 4: Review, approval of ESIA reports including public hearings and dissemination and obtaining Environmental Authorization.

If environmental and social impact assessment (ESIA) is required, the environmental and social study reports will be submitted by the Project Implementation Unit Coordinator for review and approval by NEA and the World Bank.

NEA in conjunction with the regional technical services will ensure that all environmental and social impacts have been identified and that effective, realistic, and feasible mitigation measures have been proposed as part of the sub-project implementation.

The validation of the ESIA and the preparation of a reasoned opinion by the NEA following the validation workshop will trigger the decision of the Minister in charge of the Environment, which will be notified to the Project Implementation Unit in the form of an Environmental Compliance Certificate.

The ESMP thus contained in the ESIA constitutes a commitment and an obligation for the Project.

Step 5: Integration of environmental and social provisions in the tender documents

⁴⁸ The project will only financially support investments/sub-projects that have gone through this screening process and for which the required documentation has been prepared and validated. The Project Coordinator will submit the selection report to the WB for clearance and approval of the results.

The integration of environmental and social provisions into the sub-projects is the key step in taking the measures into account in the financing of the sub-project. Thus, this integration will be done:

- If ESIA's are carried out, the Environmental and Social Safeguards Specialists of the Project implementation Unit (PCU) will ensure that the recommendations and other environmental and social management measures resulting from these studies are incorporated into the bidding documents. In addition, it will append environmental and social clauses to the tender documents (see Annex 4) and to the execution of the investments/subprojects, including binding clauses with sanctions in case of non-compliance, particularly in the implementation of specific measures.
- In the case of low-risk sub-projects: environmental and social requirements will be included in the Request for Proposals (RPF) so that they are carried out as part of the sub-project implementation.

The cost of implementing the environmental and social measures must be included in the sub-project costs as a separate line item in the price schedule and the works specification document.

The PCU will only be able to appraise the execution of the project's technical files when all environmental and social due diligence is effectively considered and integrated into the files.

Step 6: Approval of the Contractors-ESMP

Before starting the civil works, the contractor is required to submit a contractor Environmental and Social Management Plan (C-ESMP) including a grievance mechanism for workers and management of SEA/SH risks, a Waste Management Plan (WMP) and an Occupational Health and Safety Plan (OHSP) to the Owner Engineer (OE). Annex 7 presents the structure of a subproject ESMP which is to be included in the bidding documents.

After Bank non-objection, the C-ESMP should be implemented by the contractor..

Step 7: Implementation of environmental and social measures

For each activity, companies are responsible for implementing environmental and social measures.

A person in charge designated for this purpose will supervise them at the level of the contractor. The operation of the building site is centralized around the Director of Works to which is attached directly the management of the environment, health, and safety at work on the building site ensured by the Environmentalist of the Company. The responsibilities of this last are:

- (i) the overall respect of their commitments towards the project owner
- (ii) the respect of the commitments regarding the implementation of environmental and social measures
- (iii) the provision of reports and other required documents integrating the management of environmental and social measures to efficiently ensure the supervision of the environmental and social management during the construction site.

Step 8: Environmental and social monitoring and follow-up

Environmental monitoring of the activities will be conducted as part of the overall project monitoring system. The environmental monitoring concerns both the implementation phase and the operation of the infrastructures to be realized with the support of the project. The environmental monitoring makes it possible to check and appreciate the effectiveness, the effectiveness, and the efficiency of the implementation of the environmental and social measures, hygiene, health, and safety of the Project

- During the construction/rehabilitation works, the Environmental/Social Specialists of the Owner Engineer (OE) who will be recruited by the project will undertake monitoring. This monitoring will go hand in hand with the timing of the impacts and the proposal of prevention, mitigation, or compensation measures. The Owner Engineer (OE) will prepare and submit to the project monthly reports on the environmental and social compliance of the work site. The review and approval of the C-ESMP need to be mentioned in the TOR of the Owner Engineer.
- Internal supervision at the national level will be provided by the Environmental and Social Safeguards Specialists of the Project implementation Unit (PCU) of the project supported by the designated Specialists of the Structures Responsible for the relevant activities within the Ministry of Finance and Economic Affairs (MoFEA). They are responsible for producing quarterly reports on the project's environmental and social compliance. The PCU will share these reports with the World Bank and NEA. This monitoring program may allow, if necessary, to redirect the work and possibly improve the progress of the construction and implementation of the various project components.
- National/regional external monitoring will be carried out by NEA's central and regional offices whose mandate is to monitor the environmental and social compliance of projects and programs, based on ESMPs. This monitoring will involve communal authorities. This monitoring is essential to ensure that:
 - (i) impact predictions are accurate (effects monitoring)
 - (ii) prevention, mitigation, and compensation measures achieve the desired objectives (effects monitoring)
 - (iii) regulations and standards are met (compliance monitoring); and
 - (iv) environmental operating criteria are met (inspection and monitoring).
- External monitoring will be carried out during joint World Bank support missions. These missions will ensure that environmental and social indicators are monitored, and that

corrective action is taken if monitoring results indicate, for example, a deterioration in environmental quality.

- During the operation phase of the sub-project, the project PCU will ensure the establishment and training of management committees to develop and ensure the implementation of environmental, social, health and safety measures.
- The evaluation will be carried out by consultants (national and/or international), at mid-term and at the end of the project.

6.3 Responsibilities for the implementation of the environmental and social procedure

Table 11 below provides a summary of the steps in the sub-projects' socio-environmental analysis procedure and specifies the institutional responsibilities for selecting and preparing the project appraisal and implementation of project sub-projects activities.

Overall, for a successful implementation of Environmental and Social Safeguards aspects, but also Gender and vulnerability (SEA/SH/VAC) and Occupational Health and Safety (OHS), and stakeholder engagement and inclusion, the project will have a Social and Environmental Safeguards Unit comprised of the following Specialist:

a) Core E&S team:

- One Environmental Specialist (ES)
- One Social Development Specialist (SDS), with Gender and GBV SEA/SH experience

Figure 1: Project Environmental and Social Risk Management Institutional Arrangement

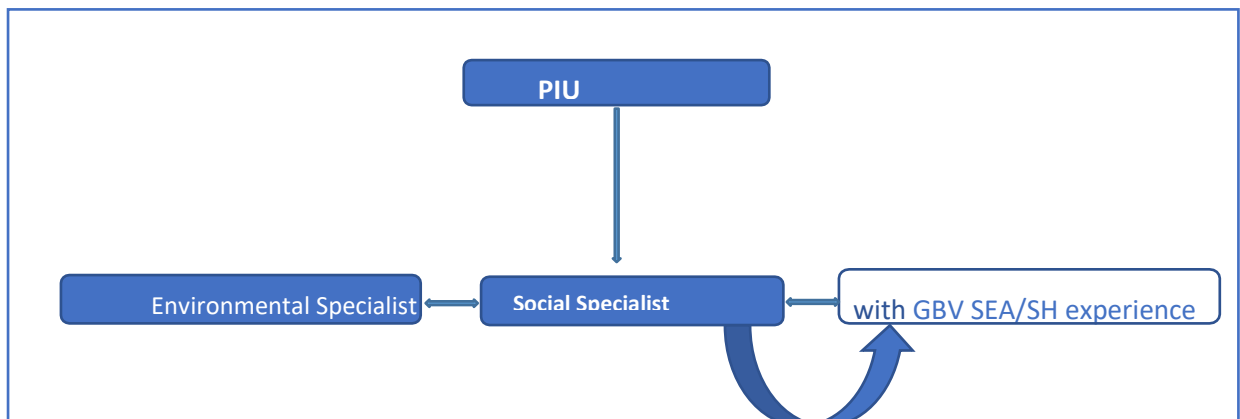


Table 10: Summary of procedural steps and responsibilities

No	Step	Activity	Manager	Support/ Collaboration
1.	Completion of the form and environmental and social classification	<ul style="list-style-type: none"> Environmental and social characterization of the site <ul style="list-style-type: none"> Identification of the location/site Main technical characteristics of the sub-project Identify the nature and extent of the environmental and social impact of the subproject Environmental selection and determination of the type of specific safeguard instrument (ESIA or PE&S) 	<ul style="list-style-type: none"> PCU Environmental Safeguard Specialist (ESS)/Social Safeguard Specialist (SSS) – including GBV Specialist (EAS/SH) 	<ul style="list-style-type: none"> NEA Municipalities Technical departments of the Ministries in charge of the project
2.	Approval of sub-project categorization	Validation of the selection and environmental and social classification of activities	<ul style="list-style-type: none"> E&S Specialists PCU 	<ul style="list-style-type: none"> PCU's /SSS of the Project PCU World Bank
3.	Environmental and social studies carried out: Preparation of the specific E&S risk management instrument of the sub-project category: Substantial and Moderate			
	3.1. When an ESIA is required	Preparation of the TOR	NEA World Bank	<ul style="list-style-type: none"> PCU ESS/SSS
		Approval of the TOR	<ul style="list-style-type: none"> NEA World Bank 	ESS/SSS of the Project World Bank
		Carrying out the required environmental and social studies, including public consultation	<ul style="list-style-type: none"> Consultant 	<ul style="list-style-type: none"> ESS/SSS of the Project PCU Project Procurement Specialist (PPS) Technical departments of the Ministry of Finance and Economic Affairs (MoFEA), the Ministry of Basic and

				Secondary Education (MoBSE), Ministry of Higher Education, Research, Science & Technology (MoHERST), the Ministry of Finance and Economic Affairs (MoFEA), and the National Nutrition Agency (NaNA)
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	3.2 When site-specific E&S studies are requested	Carrying out the required site-specific environmental and social studies, including public consultation & disclosure	Consultant (under the leadership of MOFEA and the PCU safeguards team)	<ul style="list-style-type: none"> • MOFEA Team • PCU ESS (Inform the WB)
	3.3. When an environmental and social study is not required	Elaboration of environmental and social requirements	<ul style="list-style-type: none"> • PCU ESS/SSS 	<ul style="list-style-type: none"> • Technical departments of the the Ministry of Finance and Economic Affairs (MoFEA), the Ministry of Basic and Secondary Education (MoBSE), Ministry of Higher Education, Research, Science & Technology (MoHERST), the Ministry of Finance and Economic Affairs (MoFEA), and the National Nutrition Agency (NaNA)
4.	Review, approval of ESIA and site-specific safeguards reports including consultation, participation & Inclusion	Review and approval of subprojects requiring ESIA or NSIA in <i>ad hoc</i> committee	<ul style="list-style-type: none"> • NEA • PCU SSS/ESS • WB (reviews/provide s clearance) 	<ul style="list-style-type: none"> • PCU SSE /SSS
	Hearing dissemination, obtaining Environmental Authorization	Validation of the document and obtaining the environmental authorization	<ul style="list-style-type: none"> • NEA • PCU SSS/ESS 	<ul style="list-style-type: none"> • Technical departments of the Ministries of the Ministry of Finance and Economic Affairs (MoFEA), the Ministry of Basic and Secondary Education (MoBSE), Ministry of Higher Education, Research, Science & Technology (MoHERST), the Ministry of Finance and Economic Affairs (MoFEA), and the

				National Nutrition Agency (NaNA) <ul style="list-style-type: none"> Local Authorities PCU SSS/ESS World Bank
		Disclosure of the document		World Bank PCU
5.	Integration of environmental social provisions in the tender documents as well as Contract	The mitigation measures of the sub-projects site - specific ESMP that have undergone ESMP or C-ESMP will be directly integrated into the RFP along with the environmental and social Clauses	<ul style="list-style-type: none"> PCU ESS/SSS 	World Bank
		The environmental and social requirements of low- risk subprojects are translated into environmental and social clauses and integrated into the tender documents & Contracts	<ul style="list-style-type: none"> PCU ESS/SSS 	<ul style="list-style-type: none"> World Bank
6.	Approval of Contractor ESMP (C-ESMP)		<ul style="list-style-type: none"> Monitoring OE's PCU ESS/SSS NEA 	<ul style="list-style-type: none"> NEA World Bank
7.	Implementation of environmental and social measures		<ul style="list-style-type: none"> Companies PCU ESS/SSS 	<ul style="list-style-type: none"> Consultant NGO Local Authority Owner Engineer
8.	Environmental monitoring and supervision (including Capacity Building & Strengthening)			

	8.1. Proximity/close – monitoring	<ul style="list-style-type: none"> • Monitoring Owner Engineer • Contractors 	<ul style="list-style-type: none"> • Providers/Companies
	8.2 Capacity Building & Strengthening	<ul style="list-style-type: none"> • PCU ESS/SSS 	<ul style="list-style-type: none"> • PCU ESS/SSS • NEA • World Bank
	8.3. Internal supervision of the implementation of E&S measures	<ul style="list-style-type: none"> • PCU ESS/SSS 	<ul style="list-style-type: none"> • Monitoring Owner's Engineer • Providers/Companies • Municipalities • Technical Services • Monitoring and Evaluation • Specialist (M&E)
	8.4. External environmental and social monitoring and evaluation	<ul style="list-style-type: none"> • NEA 	<ul style="list-style-type: none"> • PCU ESS/SSS • Contractors • Municipalities, • Technical Services
	8.5. Supervision	<ul style="list-style-type: none"> • World Bank 	
	8.6. Evaluation/Audit of the implementation of E&S measures	Consultant	<ul style="list-style-type: none"> • PCU ESS/SSS • NEA • World Bank • Municipalities, • Technical Services
	Project Safeguards compliance closure	PCU ESS/SSS	<ul style="list-style-type: none"> • PCU • NEA • World Bank

6.4 Institutional mechanism for implementing the ESMF

The implementation of the environmental measures of the ESMF will have to involve different actors in particular, the Project Implementation Unit (PCU), the NEA, the concerned communities, NGOs, and civil society organization, etc. This section presents the institutional arrangements involved in the implementation of environmental and social measures related to the Project. The table below provides a summary of the institutional responsibilities for the selection and preparation, appraisal, approval, and implementation of subprojects.

Table 11: Institutional arrangement for environmental & social management

Concerned Institutions	Responsibility for the environmental & social management of the Project
Project Implementation Unit (PIU) (MoFEA)	<p>The Project Implementation Unit (PCU) will carry out environmental and social management. It is responsible for the environmental, social, hygiene, health, and safety compliance of the Project, for the preparation of assessments and capitalization and completion and for obtaining the permits and authorizations required by the regulations. It will not deliver the work order to start onsite activities until the C-ESMP has been approved. In addition, the PCU reports to the steering committee and ensures that the World Bank and other stakeholders receive all environmental and social monitoring reports. The PCU will recruit (i) an Environmental Specialist (ES), (ii) a Social Development Specialist (SDS), one GBV specialist, one OHS Consultant, and one Stakeholder Engagement/Communications Consultant.</p> <p>The Project Coordinator is responsible for the quality of the personnel in charge of environmental and social management, GBV as well as OHS and Communication; and for the publication of the safeguard documents drawn up. The Project Coordinator is also responsible to submit documents to the NEA Regional Office and the World Bank. The project coordination will also recruit NGOs for sensitization, mobilization, and social support; training of other actors in environmental and social management; monitoring/evaluation of the implementation; it will ensure the dissemination of the ESMF.</p> <p>The PCU Environmental and Social Safeguards Specialists have overall responsibility for the monitoring the implementation of E&S material measures set out in this ESMF, ESCP, LMP, SEP, RPF and other site specific environmental and social instruments to be prepared during project implementation. They will also prepare quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. In conjunction with local Government technical staff, they will be responsible for the preparation of the environmental and social selection forms for sub-projects. In addition, they will be co-responsible for the screening and establishment of the sub-projects environmental and social guidelines for. To this end, they will work in close collaboration with the National environmental agency (NEA).</p> <p>The Procurement Specialist of the PCU participates in collaboration with the Environmental and Social specialists in the recruitment of consultants for environmental and social studies/services. He/she is responsible for the preparation of tenders and contracts.</p>
Project Coordinating Unit (PCU) (MoBSE)	<p>The (Environmental, Social Specialist) will ensure internal monitoring of the implementation of environmental and social measures for component 1 and send quarterly reports to the Project Implementation Unit (PIU) MoFEA. The two specialists coordinate the implementation of Information, Education and Awareness Programs in the communes benefiting from the project to provide information on the work and the environmental and social issues at stake during the implementation of the project's activities.</p>
Implementing Unit at MOHERST	<p>The project implementing officers will ensure internal monitoring of the implementation of environmental and social measures for component 2 and send quarterly reports to the Project Implementation (PIU) MoFEA. The implementing officers coordinate the implementation of the TVET</p>

Concerned Institutions	Responsibility for the environmental & social management of the Project
	activities and provide information of environmental and social issues for project beneficiary including: (i) the SkYE fund implementation to address youth employability; and (ii) Support to improve pre-service teacher preparation at Gambia College, which trains most of the country's teachers.
Implementing Unit at NaNA	<p>The project implementing officers will safeguard internal monitoring of the implementation of environmental and social measures for component 3 and send quarterly reports to the Project Implementing Unit (PIU) MoFEA</p> <p>Therefore, the team will incorporate E&S measures to support the completion of data collection for the GamSR, including the remaining two districts to create a nationwide social registry across all 43 districts in The Gambia.</p>
The World Bank	<ul style="list-style-type: none"> • Oversight of the Implementation of environmental and social requirements for the project • Approval of prepared TORs for E&S studies • Monitoring the progress of the environmental and social studies • Verification of the conformity of the study with the terms of reference • Verification of the compliance of the activities with the WB requirements, especially the environmental and social standards • Supervision/implementation support mission for the assessment of field works and level of compliance
National Environment Agency	<p>The NEA through the regional offices in collaboration with the ESS and SSS will participate in the environmental classification of activities. It is responsible for:</p> <ul style="list-style-type: none"> • Validating the level of environmental and social assessment to be applied to activities • Approval of project notices and/or TORs for activities requiring ESIA • Approval of the ESIA as well as. • At the local level, the NEA will rely on the TACs for proximity monitoring • Issuance of the Environmental and Social Compliance Certificate to the TGRDRP and environmental authorizations for the implementation of activities • Verification of compliance with the environmental and social specifications (ESMF) by the project and its contractors • Monitoring, evaluation, and control (in case of ESIA or ESMP).
Contractors	<p>The contracting companies shall prepare and submit the (C-ESMP) including all the site-specific plans for each activity of the project 30 days before the physical start of the civil works. They must carry out the environmental and social measures and respect the directives and other environmental prescriptions contained in the works contracts. To this end, the companies must have a Health, Safety and Environment Manager who will be responsible for implementing the various safeguard documents and drafting reports on the implementation of the said ESMP.</p>

Concerned Institutions	Responsibility for the environmental & social management of the Project
Consultants, Design Offices	<p>The Consultants and Consulting Firms ensure the completion of the required environmental and social studies, including the ESMP in accordance with the requirements of the World Bank's environmental and social standards. They will also ensure that the ex-post evaluation (external audit) is carried out.</p> <p>During construction phase, the engineering and control offices acts as project manager and ensures the effectiveness and efficiency of the monitoring of environmental and social measures and the consistency with the directives and other environmental prescriptions contained in the construction contracts. The control offices are responsible for monitoring and implementing the site specific ESMPs including C-ESMP, with a supervisor specialized in Health, Safety and Environment on their teams.</p>
Civil Society Organizations	<ul style="list-style-type: none"> - Civil society organizations (CSOs) and community associations: In addition to social mobilization, they will participate in raising awareness among the population and monitoring the implementation of the ESMF, particularly the ESMP, by challenging the main Project stakeholders. These civil society organizations (CSOs) will also participate in the implementation of the SEP, including communication and stakeholder engagement activities of the Project. These NGOs, CSOs and other environmental and social organizations will also be able to participate in the implementation of the ESMF measures.
Local authorities, Local communities	<p>Local and regional authorities and communities must be involved and participate in the environmental and social screening of sub- projects, in the close monitoring of the implementation of the ESMP recommendations, and in information and awareness-raising activities for the beneficiary communities. They will be able to provide support for the implementation of mitigation measures in the public consultation component and the complaints management process.</p>
Committee for the resolution of complaints	<ul style="list-style-type: none"> - 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 - Ensure multiple and accessible channels for all stakeholders, especially those who are vulnerable or disadvantaged - 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) - Prevent the risks and mitigate the impacts of SEA/SH by facilitating access to GBV services, raising awareness on SEA/SH amongst workers and community and enforce sanctions against perpetrators in line with the code of conduct of the project - 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

Concerned Institutions	Responsibility for the environmental & social management of the Project
Owner's Engineer	<ul style="list-style-type: none"> - Work closely with contractors' companies and offices to ensure timely and efficient compliance on safeguards and implementation schedule - Report monthly/quarterly to project management on the overall implementation schedule and project safeguard's compliance
Municipal Service in charge of the Environment	<ul style="list-style-type: none"> - Support the town hall in filling out the screening form - Support for the implementation of environmental and social measures in the field, including the pre-selection of micro- project sites - Support in monitoring and reporting.
Ministry of Gender, children and social welfare	<p>Protection of vulnerable social groups, such as children, women, and people with disabilities including the elimination of all forms of discrimination against women through;</p> <ul style="list-style-type: none"> - Awareness raising on GBV prevention and response, SEA/HS, etc. - Support and guide the complaint management process in relation to project activities.

6.5 Capacity Building Plan

The inclusion of environmental and social aspects in the ESMF must be guaranteed in order to ensure that the sub-projects implemented under the project do not generate effects that could compromise all the expected benefits. To this end, it is relevant to put in place an effective system for managing the environmental and social aspects of the various micro projects that will be carried out by the communities. The project provides for a training program for actors involved in the environmental and social assessment of sub-projects.

➤ Program objectives

The capacity building will aim at globally responding to the concern of developing the competences of the actors (Experts/Specialists of the project, responsible of the identification of the risks and environmental social impacts, and development of measures aiming at mitigating the negative impacts and on the evaluation of the performance of the components. Sectoral Cadres of the concerned ministries and of the NEA, will implement the procedure of environmental evaluation of the sub-projects.

Specifically, it will improve/strengthen the capacities of the project partners and beneficiaries in terms of

- understanding the issues and challenges of environmental protection/management in general and those of the sub-projects to lay the foundations for sustainable management of natural resources
- Knowledge and understanding of the requirements of the World Bank's environmental and social standards, as well as the national legislative and regulatory framework in this area
- Operation of the ESMF, particularly the procedure for the socio-environmental review of sub-projects and the roles of environmental stakeholders
- Procedures and tools for screening investment sub-projects according to applicable environmental and social standards
- Socio-environmental monitoring of the implementation of mitigation measures for negative impacts of sub-projects
- Knowledge of the mechanisms and procedures for managing grievances at the central level and at the regional and local levels

➤ Themes and modules for capacity building

The capacity building program for the various actors called upon to play a role in the socio-environmental process of the sub-projects is summarized in Table 13 below.

Table 12: Topics and training modules

Training and awareness theme	Time and estimated duration of Training	Actors involved	Organizer	Budget (US \$)
Training on the World Bank's environmental and social standards <ul style="list-style-type: none"> - ESS 1: Assessment and management of environmental and social risks and impacts - ESS 2: Labor and working conditions 	During the first year of the Project implementation. Duration - 5 days	PCU Staff NEA TAC MOFEA staff	Consultant World Bank specialists + 2 Support Consultants	12500

<ul style="list-style-type: none"> - ESS 5: Land Acquisition, Land Use Restrictions and Involuntary Resettlement, and Gambian Regulations ESS3, ESS4 & ESS6 ESS8 and ESS10 - Content of the Environmental and Social Commitment Plan (ESCP) - Content of the Stakeholder Engagement Plan (SEP) 				
Environmental and Social Assessment <ul style="list-style-type: none"> - knowledge of the organization and management procedures for conducting ESIA's, - Policies, procedures, and legislation on social issues in The Gambia - Knowledge of the ESIA implementation monitoring process - risk assessment, effective management of risks and negative impacts, environmental and social monitoring, and reporting 	Before the selection of sub-projects - Duration - 3 days	Technical Services PCU NE A	PCU / WB	7 000
Awareness and advocacy on issues related to environmental and social aspects of the subprojects	Prior to the selection of subprojects - Duration - 2 day	Education actors, Local Authorities, Territorial Communities	PCU	5 000
Training on the environmental and social review and assessment procedure for subprojects <ul style="list-style-type: none"> - Environmental and social screening process - provisions for the application of effective management measures of environmental and social risks and impacts recommended during the implementation of the sub-projects 	Prior to the selection of subprojects - Duration – 2 days	Regional Project Focal Points Local authorities	PCU	5 000
Training on environmental and social monitoring of sub-projects <ul style="list-style-type: none"> - Environmental and social monitoring methodology - Environmental and social monitoring/evaluation indicators - Compliance and enforcement of 	Six months before the start of civil engineering works 3 days	PCU Education actors, Local authorities	PC U NE A	10 000

environmental laws and regulations <ul style="list-style-type: none"> - Raising awareness of the population on the protection and management of the environment - Reporting system 				
Training in the implementation and monitoring of environmental and social measures	Three months before the start of civil engineering works-2 day	Companies (works manager, site manager) Design office for monitoring and control, Education actors,	Consultant NEA PCU	5 000
Occupational Health and Safety Module: <ul style="list-style-type: none"> - Personal protective equipment - Workplace risk management, prevention of work-related accidents - Health and safety rules - Solid and liquid waste management - Emergency Preparedness and Response - Proper use of personal protective equipment - Safety and security of the population with respect to refugees and host communities 	Six months before the start of civil engineering works - 2 days	Contractors	Consultant PCU NEA	5 000
Module on GBV risk <ul style="list-style-type: none"> - Awareness, prevention and mitigation of GBV/SEA/SH risks - World Bank guidance - Survivor Support - Complaint Management 	- to be delivered in a combined manner 3 day but also integrated into modules on social risks (in abbreviated form)	PCU Staff Regional Focal Points Companies (works manager, site manager) Monitoring and control engineering Office	PCU NGO	10 000
Total capacity building program				57,000 USD

7. PUBLIC CONSULTATION, PARTICIPATION, INCLUSION AND INFORMATION

7.1 Context and objective of the consultation

Stakeholder engagement is an extremely important step in the project preparation process and a fundamental requirement of the World Bank's environmental and social standards. Engagement aims to achieve open and transparent stakeholder buy-in and commitment to the project. This is because effective stakeholder buy-in to the project can improve its environmental and social sustainability and social acceptability, and it enables stakeholders to contribute meaningfully to the design and successful implementation of the project. A separate Stakeholder Engagement Plan (SEP) has been prepared which provides a more robust analysis of stakeholder engagement for this project during preparation and the plan for ongoing engagement throughout the project lifecycle.

The purpose of consultation is to seek the participation and inputs of stakeholders and affected persons/communities in project activities and project design and to ensure inclusive project benefits.

Specifically, the objectives pursued through these various consultations are:

- To provide stakeholders with accurate and relevant information on the project, including its description, components, and issues (environmental and social risks, recommended management measures, etc.)
- To invite these stakeholders to give their opinions and concerns about the project and to gather their views on the project's problems and the positive and negative environmental and social impacts that may be generated by the project as well as the related measures
- Identify in an exhaustive way the constraints likely to jeopardize the proper implementation of the project
- Identify capacity building needs within the framework of the project
- Establish a dialogue and lay the foundation for the commitment of all stakeholders to the project's objectives.

These public consultations are very important for the implementation of the project activities (especially in the context of the ESIA's to be conducted). They should identify key issues and determine how the concerns of all parties will be addressed in the implementation of activities.

7.2 Methodological approach to stakeholder consultation

The public consultation was conducted using a participatory approach that favored group or individual interviews with the parties concerned by the project. The interviews were conducted based on a predefined interview guide. They allowed the collection of various questions, concerns, and expectations of the main stakeholders to be affected by the implementation of the project.

7.3 Summary of Stakeholder Consultations Results

The table below presents a summary of stakeholder consultations (both indirect and direct stakeholders). Details are presented in Annex 12.

The consultations took place from 16th to 26th May, 2023. The main stakeholders consulted are:

Table 13: Summary of public consultations

Gouvernorats	Stakeholders	Responses/Concerns about the project	Recommendations/Suggestions
The Government of the Gambia	Ministry of Basic and Secondary Education (MoBSE), Effective Intervention	<p>The new curriculum is centered on realistic learning situation with opportunities to apply knowledge learnt. It has implications on pedagogy and assessment (giving a chance to pupils to display their skills). It is going to be piloted for a year to see how it can be taught and the impact it will make to learners.</p> <p>There is a concern on the impact of different dialects of individual tribes when using the national language to teach as this can bring confusion to the early grade pupils as they have their own languages with different dialects at home.</p> <p>For EMIS, many data has been collected but the challenge, which the Ministry and partners encounter, is the adequate and effective use of the data to inform policies and decision-making.</p> <p>Capacity to do financial recording of expenditure of funds given to Mothers' Clubs is a challenge.</p>	<p>It will be good if partners can have access to the new curriculum to integrate them into their curriculum so they can zoom on what they are trying to achieve in schools.</p> <p>There will be a standardization of ethnic dialects when using the national language.</p> <p>MoBSE is currently developing a policy on how the national language should be used to teach in schools and by the time, it is completed; English will be taught only as a subject (second language) from ECD to Grade 3.</p> <p>Development of a curriculum for using national language as a medium of instruction for early years is ongoing.</p> <p>Data needs to be accessible as there are still gaps. Partners can always request additional data from the MoBSE Planning Unit.</p> <p>Going forward, the mothers' clubs should select an educated community member who will join the club and do the financial record keeping of transactions.</p> <p>Mothers' Club has to work with the individual School Management and so adequate sensitization of both parties is required to boost the relationship and their efficiency.</p>

Gouvernorats	Stakeholders	Responses/Concerns about the project	Recommendations/Suggestions
		Schools selected for the boosting program does not include madrassas and Majalis.	Rolling out of the boosting program needs to be inclusive especially schools located in border communities in CRR, madrassas and Majalis as well.
	Ministry of Higher Education, Research, Science and Technology (MoHERST), NEDI	<p>Most youths have the skills but are not employed and they are not doing anything meaningful.</p> <p>It is important to have a system, which will consider all those in the local Mechanical workshop.</p> <p>Integrate youths trained on entrepreneurship with a focus on the informal sector into the formal system.</p> <p>There is a need align the MoBSE prevocational learning with the programs at TVET Centers.</p> <p>Entry requirements into skills centers need to be flexible and backed by the gazette article showing different routes of entry.</p> <p>There is need to know of safeguards issues which might arise during the construction of the Sapu Agribusiness.</p>	<p>It is good for the youths to have employability skills so that they can be self-employed.</p> <p>Most private institutions are not subvention; and the institutional improvement window will enhance them</p> <p>The USET model can be used in industry and the idea is to replicate it in all TVET regions. Due to scope of budget, it will be annexed to what is possible.</p> <p>Currently, there is a mapping of all kinds of skills Centers (formal and informal) in the country going on so that intervention will span across all sectors. This is justified by the need to have a whole value chain of the TVET sector from production to commercialization. Piloting is underway with NEDI to sponsor students for training on entrepreneurship with a focus on the informal sector.</p> <p>The sector wants to harmonize all programs (looking at curriculum and entry requirements) across TVET Centers as currently, Graduates from different Centers have different level of skills for the same program. The Ministry will work with the SSC to</p>

Gouvernorats	Stakeholders	Responses/Concerns about the project	Recommendations/Suggestions
			ensure they have the right quality of program and equipment for the training.
	National Nutrition Agency (NaNA)	<p>The possibility of expanding the Nafa program from 20 to the 30 districts initially proposed needs clarification.</p> <p>How does NaNA follow up on the effectiveness of the GM in order to avoid conflicts.</p> <p>The resilience and sustainability of the Nafa program is a concern as the project will end after 3 years. If the funding ceases, the implications need to be reviewed.</p> <p>Are Governors involved in the implementation of the Nafa Program? How does implementation of this program work at NaNA in the regions?</p> <p>In terms of data systems, Key Government Agencies (Immigration, Health etc.) do give identification numbers, which are always different for each institution, and individual and this can affect project implementation.</p>	<p>Under the GRP, the Nafa program will maintain the 20 districts and be completed for the 3 years initially planned and not expand to the 30 districts initially proposed.</p> <p>The satisfaction of recipients concerning the grant is always monitored and linked to the GM. Panel analysis is also conducted by an independent body. This is what justifies the PEI Program which is seen as a means to wean people off the Nafa Program to progress to income-generating activities.</p> <p>Governors are members of the Project Steering Committee, while at regional level NaNA use regional structures and partners.</p> <p>There is a need to generate a unique identification number for everybody in the country. A taskforce spanning across all sectors need to come together to review the idea.</p>

8. GRIEVANCE REDRESS MECHANISM (GRM)

It should be expected that the implementation of the Project will cause grievances to individuals and communities such that a system needs to be in place to effectively attend to, and resolve, these complaints, hence the need of a GRM, the details of which are proposed in this section.

Transparency and accountability are core elements of the Human Capital Development Project (HCDP). For this purpose, the project will include a Grievance Redress Mechanism (GRM) that is already used in a different project funded by the World Bank. The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. The GRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

8.1 Definition of GRM

For the purposes of this SEP, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

The terms 'grievance' and 'complaint' are used interchangeably.

8.2 GRM Principles

- The project-level GRM would be designed in a culturally appropriate way so as to effectively respond to the needs and concerns of all affected parties.
- The GRM would be well-publicized and known to all affected population. The implementing agency will ensure that the GRM is widely publicized and will also conduct awareness campaigns in this regard among the affected communities. Implementing agencies will brief target stakeholders about the scope of the mechanisms, the safety of the complainant, time of response, the referral and appeal processes.
- Accessibility - The GRM will be clear, accessible to all segments of affected communities, living within the vicinity of the project and subprojects sites or location.
- The Mechanism would allow for multiple avenues of uptake of grievances.
- The system would be sensitive to women, men, boys and girls, as well as vulnerable populations such as persons with disabilities, elderly, displaced persons and other marginalized groups.
- Confidentiality and prevention against retaliation.
- The GRM would be designed to protect beneficiaries and stakeholder's rights to comment and complain, and even raise their complaints to higher management if they are not satisfied with services or receive insufficient solutions. The mechanism would facilitate their sharing of concerns freely with understanding that no retribution will be exacted for their participation. To create a safe space, anonymous complaints will also be allowed.
- The GRM shall provide for relaying regular information and feedback regarding the redressal of the grievance to the aggrieved.
- The Mechanism shall be responsive in redressal of grievances by facilitating resolution with the concerned actor in the implementing chain.

- The GRM would be based on transparency and accountability. All complainants will be heard, taken seriously, and treated fairly. The community and stakeholders will be aware of the expectation from the project; the GRM procedures; understand its purpose, have sufficient information on how to access it.
- The GRM will have provisions to appeal if the grievances are not resolved satisfactorily
- The GRM would not prevent access to judicial and administrative remedies.

The mechanism would provide for prompt time-bound redressal of grievances.

8.3 Objectives and grievances categories

The Grievance Redress Mechanism (GRM) is an essential tool that enables stakeholders to convey their grievances to the project and allows project to properly address them in a timely manner. For the purpose of this document, “grievances” refers to any formal concerns, complaints, suggestions or any other equivalent terms. It is anticipated that project related activities may induce grievances.

Categories of grievances include:

- Conflicts related to the diversion or suspicion of diversion of the workers benefits; Incidents due to lack of communication;
- Conflicts of interest;
- Conflicts between employers and employees related to late (or non-payment) of wages or bonuses;
- Disputes related to the removal or reduction of financial or non-financial benefits; Disputes related to the degrading treatment of certain executives;
- Disputes related to an administrative task.

8.4 Institutional Framework

The GRM institutional framework is intended to provide a description of the various committees that will be set up by the Project Steering Committee (PSC) to achieve the objectives assigned by the project. It involves all stakeholders in the Project implementation process.

This GRM consists of two (02) levels:

- **Level 1:** The Project Implementation Unit which will be based at the Implementing Agency, the Directorate of Public Private Partnership (DPPP) of the Ministry of Finance. The Director of DPPP will chair it.
- **Level 2:** The Project Steering Committee, which will be composed of high-level officers representing all project stakeholders. The Permanent Secretary of MoFEA will chair it.

8.5 The Grievance Redress Mechanism (GRM) Operational Procedures

During the GRM disclosure process, employees and stakeholders will receive a brochure of the GRM procedures. Alternatively, the content of this document will be read to illiterate workers who will confirm their understanding by signing a form.

Communities and individual workers who believe they are adversely affected by the Gambia Fiscal Management Development project may submit their claims to the existing process, the description of which is as follows:

Step 1: Grievance Receipt, Registration and Uptake Channels

The receipt and registration of grievances consists in allowing any worker or eligible person to convey their grievance to the various GRM management committees. In complex and/or sensitive situations, these grievances are made anonymously through the various channels (email, letter/note, in person through a representative, etc.) to protect the plaintiff and to allow for an investigation. Each member of the committee constitutes an uptake channel where a complaint can be filed.

Grievances can be submitted by:

Table 1 : Various channels to make a complain.

a) <u>Official mail;</u>	➤ <u>Please provide information</u>
b) <u>Phone call (toll free number);</u>	➤ <u>Please provide information</u>
c) <u>Sending an SMS (short message service);</u>	➤ <u>Please provide information</u>
d) <u>In person (staff who receive grievances verbally must put them in writing);</u>	➤ <u>Please provide information</u>
e) <u>E-mail;</u>	➤ <u>Please provide information</u>
f) <u>Complaint boxes;</u>	➤ <u>Please provide information</u>

The project shall ensure flexibility in the channels available for complaints, as well as ensure accessibility to the contact information for individuals who make complaints. HCDP's Executive Director must be informed of all complaints received.

Confidentiality and conflict of interest: Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to submit complaints have been established and conflicts of interest will be avoided.

Step 2: Assessment, Acknowledgement and Response

➤ **Acknowledgment of receipt**

Each member of GRM Committee receiving the grievance must inform the plaintiff (using the plaintiff's preferred acknowledgement of receipt/way of notification) () that the grievance has been received, that it will be registered by the relevant Secretary, given a reference number and assessed to determine its eligibility. When the plaintiff files the grievance in person, the acknowledgment of receipt is **immediately** given to him/ her and the notification to the relevant secretary must be made within **two days**. When the grievance is filed in other forms, the acknowledgment of receipt is sent within **a maximum of two days**.

➤ **Assessment of eligibility**

Eligibility is based on the following criteria:

- Does the plaintiff indicate whether a person, body/service or project activities or processes have had a negative impact or economic or social harm on the plaintiff or could have such impact or harm?
- Does the grievance specify the type of existing or potential impact or harm, and how the person, service or structure has or may have caused such impact?
- Does the grievance indicate that the plaintiff is the one who is impacted or at risk? Or it indicates that the plaintiff represents affected or potentially affected stakeholders?
- Does the grievance not concern cases that have already been settled?
- Is the grievance documented? Any relevant details about the date, place, date of appointment, department/unit,

copies of any letters or other documents to support the grievance?

The grievance eligibility assessment is made within **5 days** of receiving the grievance. If a grievance is deemed ineligible, the reasons for this decision must be provided to the plaintiff.

➤ **Assignment of Responsibility:**

The claims are referred to the competent agency/entity based on the plaintiff issue. Given that various partners will intervene in activities related to project activities, it is important that the PIU coordinates the GRM implementation and the response to the plaintiffs.

Plaintiffs are sent a response to their grievance through their chosen route. In total, grievances acknowledgement of receipt and its eligibility assessment are made within 5 days of the grievance reception.

Step 3: Investigation and Response Proposals

The concerned Grievance Management Committee (PIU and PSC Grievance Management Committee) will review the details and grounds for the grievance with the assistance of a resource person, if necessary. Additional support or information may be gathered from other fitting source to more clearly describe the cause and effects of the grievance, its urgency or seriousness and its link to the project. Surveys may include an in-depth assessment (field visits, collection of evidence, technical expertise) to determine: the scale and impact of the grievance and what options there may be for appropriate responses or resolutions.

This GRM provides for two types of response proposals/decisions:

- ❑ direct action to solve the problem (awareness, training, compensation, conciliation or mediation);
- ❑ further assessment and engagement with the plaintiff and other stakeholders to jointly determine the best solution and its implementation.

The time for the response proposal must not exceed 17 days from the date of receipt of the grievance by the GMCs.

Step 4: Communication of the response proposal to the plaintiff and seeking an agreement

The committee held is responsible for communicating the proposed response, in writing or by any other means, in a language understandable to the plaintiff. Where appropriate, plaintiffs may be invited to meetings to review and revise the initial approach. The response should include a clear explanation for the proposed response, the nature of the response and the options available to the plaintiff in light of the response. If the plaintiff does not agree with the resolution proposed, he or she can refer the matter to the Project Steering Committee level; If an agreement is not reached at this level, the PSC members must ensure that the plaintiff understands what other official remedies (i.e. Labor Commissioner, courts, Ombudsman Office etc.) are available through the administrative or judicial system.

The answer must include a clear explanation of why the response is proposed. Options may be a proposed draft agreement, a referral to a higher authority, further dialogue on the proposed action or participation in the proposed evaluation and engagement procedure. In addition, the response must indicate all other organizational, judicial, non-judicial but official remedies that the plaintiff may consider (i.e. Labor Commissioner, courts, Ombudsman Office etc.)

Although it varies in practice, the proposed response must be communicated within 15 days

of receipt of the grievance. This period may be extended by 7 days depending on the nature or complexity of the dispute. Where grievance claim serious damage or risk and/or serious rights violations, the operational procedures of the GRM shall provide for an expedited response, either by the GRM or by referral to another instance with immediate notification to the plaintiff of this referral.

The plaintiff may or may not accept the proposed response. If the worker or plaintiff disagrees with the decision of inadmissibility, rejects the proposed direct action or refuses to participate in a more thorough assessment and engagement process with the stakeholders, the settlement authority must clarify the reasons for the refusal, provide additional information and if possible, revise the proposed response.

If an agreement is still not reached, the GRM committee that ruled on the complaint must ensure that the worker or plaintiff understands what other remedies may be available, through the administrative or judicial system. The GRM Committee must document the outcome of discussions with the plaintiff and clearly indicate the options that were offered and the reasons for the rejection.

Step 5: Implementation of the Proposed Response

The proposed response must be implemented when agreement has been reached between the worker or plaintiff and the GRM Committee to proceed with the proposed action or stakeholder engagement process.

When the initial proposed response is to start a process of evaluation and engagement of all stakeholders, this procedure may be carried out by the staff required by the GRM Committee to do so or by other entities considered as impartial and effective by the GRM committee, the worker or plaintiff and other stakeholders.

When a cooperative approach is possible, the GRM committees must be responsible for its oversight. These committees can directly facilitate the work of stakeholders, contract with a mediator or use traditional conflict resolution and consultation procedures (i.e. Labor Commissioner, courts, Ombudsman Office etc.)

Step 6: Re-assessment of the Proposal Response in Case of Failure

Several cases can lead to this:

- Failing to reach an agreement with the worker or the plaintiff on the proposed response;
- Multi-stakeholders' conflict where the evaluation procedure concluded that a

cooperative approach is not feasible.

In these cases, the GRM committees should review the situation with the plaintiff and see if a change to the response can satisfy the plaintiff and other stakeholders. If this is not the case, the GRM committee must inform the complainant of other potential alternatives, including judicial or administrative review mechanisms. If the grievance is lodged at the RGM level, the latter must inform the plaintiff of the possibility escalating the matter to the EGMC. Regardless of the choice of the worker who filed the grievance or any other plaintiffs, it is important that the GRM committee that rendered the decisions, render and document the entire process.

Step 7: Referral of Grievance

If the plaintiff is satisfied with the proposed response, this should be documented by the GRM committees in charge of the process. In cases of serious risks and impacts and/or negative publicity, it may be appropriate to include documentation written by the plaintiff indicating his satisfaction after the response. In other cases, it will be sufficient for the relevant bodies to note the action and satisfaction of the plaintiff and other stakeholders. It may be useful to include lessons learned when the situation has been particularly complex or unusual.

If the grievance has not been resolved, the relevant GRM committee must document the steps followed, the communication

with the plaintiff, and with other stakeholders if significant efforts have been made to initiate or finalize a procedure involving different stakeholders and decisions made by the company and the plaintiff regarding referral or use of other alternatives, including the judicial process.

In all instances, the GRM documents must maintain the confidentiality of details and provide disaggregated public statistics on the number and type of complaints received, the actions taken and the results obtained.

Accurate documentation using an electronic database is essential for public accountability, organizational learning and resource planning for the operationalization of the GRM.

8.6 Recommended Grievance Redress Time Frame

As much as possible, the HCDP uses electronic data collection and recording tools to reduce the costs of reporting, expand the capacity to monitor, and improve communication flows from the community level to the national level. The PMU thus allows data to be captured electronically and for smooth compilation of reports. The table below generally presents the recommended time frames for addressing grievances or disputes received related to HCDP.

Table 2: Proposed GRM Time Frame

Step	Process	Time frame
1	Receive and register grievance	within 24 hours
2	Acknowledge	within 24 hours
3	Assess grievance	Within 2 Days
4	Assign responsibility	Within 2 Days
5	Development of response (investigation, consultation)	within 21 Days
6	Implementation of response if agreement is reached	within 21 Days
7	Close grievance	within 30 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 30 Days
9	Implement review recommendation and close grievance	within 30 Days
10	Grievance taken to court by complainant	As applicable

Note that this is a proposed timeframe for the GRM. It will be agreed by the client if the project starts and the GM is operational.

8.7 Roles and Responsibilities for GRM

The responsibilities for the management of the GRM system include the following and may be updated from time to time in consultation with the ministerial management team and the World Bank task teams:

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints

- Thorough examination of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns (see above 4.2)
- Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GRM results.

8.8 GBV GRM

The GRM for labour specific will be detail out in the LMP.

8.8.1 Making Complaints: GBV and VAC Allegation Procedures

All staff, volunteers, consultants and sub-contractors are encouraged to report suspected or actual GBV or VAC cases. Managers are required to report suspected or actual GBV and/or VAC cases as they have responsibilities to uphold company commitments and they hold their direct reports accountable for complying with the Individual Code of Conduct. The project will provide information to employees and the community on how to report cases of GBV and VAC Code of Conduct breaches through the Grievance Redress Mechanism (GRM). The GCCT will follow up on cases of GBV, VAC and Code of Conduct breaches reported through the GRM.

8.8.2 Process for addressing GBV or VAC complaints

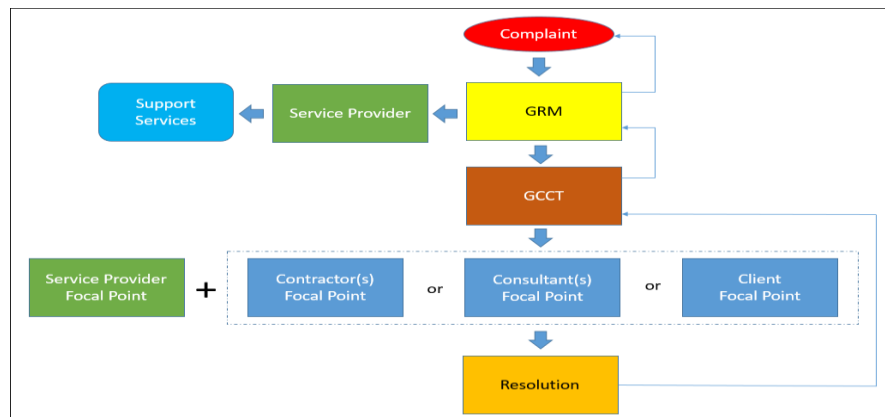
The figure below shows the process for addressing complaints.

The project operates a grievance redress mechanism (GRM). Reports of GBV or VAC, other complaints, or other concerns may be submitted online, via telephone or mail, or in person.

The GRM operator will refer complaints related to GBV or VAC to the GCCT to resolve them. In accordance with the Action Plan, the GCCT through the Service Provider and Focal Point(s) will investigate the complaint and ultimately provide the GRM operator with a resolution to the complaint, or the police if necessary. The GRM operator will, upon resolution, advise the complainant of the outcome, unless it was made anonymously. Complaints made to managers, or they will refer the Service Provider to the GRM for processing.

If the complaint to the GRM is made by a survivor or on behalf of a survivor, the complainant will be directly referred to the service provider to receive support services while the GCCT investigates the complaint in parallel.

Figure 2 shows the process to address complaints



9. ESMF IMPLEMENTATION ENVIRONMENTAL AND SOCIAL MONITORING AND EVALUATION MEASURES

9.1 Environmental and social monitoring and evaluation

9.1.1 Environmental and social monitoring and evaluation objectives

The objective of environmental and social monitoring and evaluation is to ensure the effective implementation of measures to mitigate negative impacts and strengthen positive ones by monitoring and evaluating the pace of activities implementation during both the development and operation phases of the site. This monitoring and evaluation will ensure that the environmental and social requirements and measures included in the contractual clauses (agreements, contracts, Tenders dossier, specifications, and general estimates) are properly applied by the beneficiaries and service providers.

Monitoring may allow, when required, to redirect the continuation of the civil work and possibly improve their overall progress.

9.1.2 Supervision

Environmental and social monitoring of the project will be carried out by the structure in charge of environmental and social assessments, namely the National Environment Agency (NEA), which will involve various other actors (decentralized services, communities, population, etc.). Thus, quarterly environmental, and social monitoring missions will be carried out by the regional branches of the NEA, and half-yearly missions by the national level. The environmental and social monitoring of the project activities will be the subject of an agreement to be signed with the NEA.

9.1.3 List of items requiring environmental and social monitoring and evaluation

Indicators are pre-identified signals that express changes in certain conditions or outcomes related to specific interventions. They are metrics that provide quantitative or qualitative information on the environmental and social impacts and benefits of the PROJECT. The indicators for monitoring the ESMF measures are summarized in Tables 15 and 16 below.

Table 14: ESMF measures monitoring Indicators

Measures	Areas of intervention	Indicators
Screening	Socio-environmental review	<ul style="list-style-type: none"> - Number of subprojects with environmental and social screening - Number of training sessions held
Technical measures (studies)	Carrying out ESIA ESMP for subprojects that require them	<ul style="list-style-type: none"> - Number of validated ESIA ESMP ToRs - Number of ESIAs developed and approved - Number of ESMP developed and approved - Number of consultations held - Number of tender and execution files that have integrated environmental and social requirements
	Internal follow-up by the E&S specialists	<ul style="list-style-type: none"> - Number and types of indicators monitored - Number of internal monitoring missions - Number of external monitoring missions - Follow-up reports

Project monitoring and evaluation measures	External monitoring	<ul style="list-style-type: none"> - Number and types of indicators monitored - Number of internal monitoring missions - Number of external monitoring missions - Follow-up reports
Training/Awareness	Training on the defined socio-environmental themes	<ul style="list-style-type: none"> - Number and nature of modules developed - Number of sessions organized - Typology and number of participants trained per stakeholder group involved (disaggregated by sex) - Training reports

Table 15 . Environmental and Social Components Monitoring Indicators

Environmental and human elements	Monitoring measures
Air	<ul style="list-style-type: none"> - Evaluation of the level of dust and other fine particles emission - Visual and technical control of smoke, gas, and dust emission levels
Soils	<ul style="list-style-type: none"> - Visual assessment of soil erosion control measures - Monitoring of waste practices - Monitoring of borrow pits areas reclamation practices - Monitoring of nuisance and pollution and various soil contaminations (pollutants, oils, greases, etc.) - Soil control at the base camp and related facilities
Water	<ul style="list-style-type: none"> - Monitoring of wastewater discharge procedures and facilities - Monitoring of water resource use activities - Monitoring of erosion control measures - Water quality control (wells)
Occupational Health and safety	<ul style="list-style-type: none"> - Strict application of internal regulations on health, hygiene, and safety measures - Control of the availability of PPE and appropriate safety instructions - Control of compliance with risk, hazard, and accident prevention provisions - Monitoring of compliance with periodic medical examinations of employees - Control of the respect of the application of the labor legislation: supply and wearing of adequate protective equipment for the site personnel - Control of the installation of safety instructions and hygiene measures on construction sites, including measures against COVID-19 - Control of the level of awareness of the site personnel and the local population - Monitoring the effectiveness of outreach programs with local communities - Monitoring of the effectiveness and efficiency of the recommended awareness measures - Number of locally recruited workers (disaggregated by sex) - Number of people (staff and workers) informed and sensitized (disaggregated by sex) about safety, health & security, and other E&S as well as SEA/SH mitigation measures - Posting of internal regulations signed by the Labor Inspectorate - Percentage of workers wearing PPE - Percentage of workers who have signed the Code of Conduct
Sexual Exploitation and Abuse and Sexual	<ul style="list-style-type: none"> - Percentage of SEA/SH/VAC complaints registered by GM that were referred to GBV care services

Harassment	<ul style="list-style-type: none"> - Number of awareness sessions on GBV/SEA/SH/VAC <ul style="list-style-type: none"> - Number of organized training sessions for staff/workers on the Code of Conduct clearly prohibiting SEA/SH and listing sanctions - Number of staff/workers who attended a CoC training session - Percentage of all staff/workers who have signed the CoC - Number of small separate consultations with women and girls facilitated by a woman organized - Number of women that took part on consultations in small separate groups facilitated by a woman
Living environment	<ul style="list-style-type: none"> - Monitoring of waste collection and disposal practice - Control of spoil and other waste disposal sites at life bases and construction site - Control of noise emission thresholds;
Jobs and revenues	<ul style="list-style-type: none"> - Control of the hiring of workers in the riparian zones - Control of the level of development of economic activities in the area
Infrastructure	<ul style="list-style-type: none"> - Compensation, social support for those affected - Control of the effectiveness of compensation paid to the population for property losses - Surveys of administrative and local authorities on the relevance of awareness campaigns conducted among local populations - Control of the occupation of the Rights-of-Way of the works (fields, pastures, fallow lands, etc.)
Security in worksites	<ul style="list-style-type: none"> - Verification of the availability of safety instructions in case of an accident - the existence of appropriate signage - compliance with traffic regulations - o compliance with the speed limit on the wearing of adequate protective equipment
Archaeological heritage and cultural	<ul style="list-style-type: none"> - Level of application of the "chance find" procedure - Quantity and nature of cultural property discovered - Number of alerts from cultural heritage services

9.1.4 Reporting

To better monitor the implementation of the ESMF, the following reporting system is proposed:

- Monthly implementation reports produced by the environmental and social specialists of the contractors to be submitted to the Owner's Engineer and will submit them to the PCU
- Monthly implementation monitoring reports to be produced by the Environmental and Social Specialists and submitted to the PCU Coordinator to submit to the World Bank and NEA as required
- Quarterly implementation monitoring reports produced by the Project's PCU safeguard experts that will be transmitted to the World Bank and the NEA.

10. SCHEDULE AND BUDGET FOR IMPLEMENTATION OF THE ESMF

10.1 Estimated budget for ESMF implementation

The estimated budget for the ESMF implementation includes both Environmental and Social Monitoring Plan and Capacity Building plan plus additional costs related to the environmental and social assessment procedures of sub-projects. Thus, the estimated costs of environmental and social measures amount to **US\$ 1,046,000.00** as shown in Table 17 below.

Table 16: Estimated costs of the ESMF environmental and social measures

Activities	Quantity	Unit cost	Total cost US\$
Institutional measures			
3. Recruitment of Specialists in Environmental and Social Safeguards with GBV, SEA/SH experience for the Social Safeguards specialist.			Included in budget of project
4. Monitoring of the implementation of the project's environmental and social instruments by NEA, as well as logistic and technical support			50 000
E&S measures			
10. ESMF National Outreach Workshop	01	01	5 000
11. ESMF Regional Outreach Workshop	03	2 500	7,500
12. Screening of sub-projects	PM	PM	Included in budget of Project
13. Environmental and Social Monitoring Plan			195,000
15. Ongoing monitoring of ESMP implementation by Environmental and Social Specialists			Included in budget of project
16. Evaluation (mid-term and final) of the implementation of the ESMF	02	50 000	100 000
Training/Awareness			
14. Module on SEA/SH/VAC risk for PCU staff, project workers and beneficiary communities	02	5 000	10 000
15. Occupational Health and Safety Module for contracted and supply workers	02	3 500	10 500
16. Training on the World Bank's environmental and social standards – for PCU staff and contractors and implementing partner Agencies	03	5 000	15 000
17. Capacity building for all stakeholders – PCU, implementing partners, contractors etc.			57,000
Implementation of the GM			

19. Formation and installation of Grievance Resolution Committees	1	5000	5000
20. Organization of awareness raising campaigns and popularization of the GM to stakeholders in the communes of intervention	3	2500	7000
21. Support for the operation of local management committees	2	2500	5000

Activities	Quantity	Unit cost	Total cost US\$
22. Oversight and evaluation of the complaint management process	1	4000	4000
23. Implementation of the SEA/SH Prevention and Response Action Plan (see Annex 4)			75000
TOTAL	One million forty-six thousand USD		1,046,000.00

CONCLUSION

The Ministry of Finance and Economic Affairs (MoFEA) with the support of the Ministry of Basic and Secondary Education (MoBSE), Ministry of Higher Education, Research, Science & Technology (MoHERST), the Ministry of Finance and Economic Affairs (MoFEA), and the National Nutrition Agency (NaNA) has jointly prepared this ESMF for all project activities in all project areas in the country to ensure that project implementation is in full compliance with national environmental legislation and the World Bank's environmental and social framework (ESF).

Policy, legal, and institutional frameworks have been assessed; public consultation and participation meetings have been held; and the report provides potential environmental and social impacts and guidelines for mitigating them. It also provides the project's environmental and social management process as well as the implementation and monitoring procedures.

This ESMF includes a built-in grievance procedure to address grievances that may arise during project implementation.

Given the nature of the project, potential adverse impacts are expected to be moderate due to small scale work, mostly site-specific and can be easily controlled by the proposed mitigation measures. The environmental and social impact assessment of the proposed sub-projects will be conducted and will propose site-specific measures to mitigate adverse impacts.

The successful implementation of this ESMF will depend largely on the involvement and participation of Education stakeholders. Specifically, it is recommended that environmental and social awareness and education of key stakeholders and affected communities should be an integral part of project implementation.

From the discussions and personal interviews, it appears that most of the participants are fully committed to the objectives of the project. In this regard, the involvement of stakeholders in the design of the project concepts should enable them to take ownership of the project and ensure its sustainability.

Based on the above, the PCU will hire qualified and competent environmental and social specialists to assess and monitor the management of environmental and social risks and impacts during and after the project implementation phases and develop capacity throughout the project lifecycle.

ANNEXES

ANNEX 1. BIBLIOGRAPHY

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ANNEX 2: Codes of conduct with procedures for implementation of Environmental and Social, Health and Safety and Occupational Health and Safety standards and the prevention of Sexual Exploitation and Abuse, Sexual Harassment and Violence Against Children.

General

The purpose of these *Codes of Conduct and procedures for the implementation of Environmental and Social, Health and Safety (ESHS) and Occupational Health and Safety (HST) standards and the prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Violence Against Children (VAC)* consists of introducing a set of key definitions, codes of conduct and guidelines in order to:

- i. Clearly define the obligations of all project personnel (including contractors and day laborers) regarding the implementation of environmental, social, health and safety (ESHS) and health and safety standards at the work (HST); and
- ii. Contribute to preventing, identifying, and combating SEA/SH and VAC on the site and in surrounding communities by outlining what protocols and mechanisms will the project put in place to address risks of SEA/SH and VAC and how it will address any SEA/SH and VAC allegations that may arise.

The application of these Codes of Conduct will ensure that the project achieves its objectives in terms of ESHS and HST standards, as well as preventing and/or mitigating the risks of SEA/SH and VAC on the site of the project and in local communities.

People working in the project must adopt these Codes of Conduct which aim to:

- i. Sensitize the staff operating in the project to the expectations in terms of ESHS and HST; and
- ii. Create awareness about SEA/SH and VAC, and:
 - a) Create a consensus on the fact that such acts have no place in the project; and
 - b) Establish a protocol for identifying SEA/SH and VAC incidents; respond to such incidents; and punish them.

The purpose of Codes of Conduct is to ensure that all project personnel understand the moral values of the project, the conduct that all employees are expected to follow, and the consequences of violating these values. This understanding will contribute to a smoother, more respectful, and more productive project implementation, to ensure that the project objectives are achieved.

Definitions

In these Codes of Conduct, the following terms will be defined below: **Environmental, Social, Health and Safety (ESHS) Standards:** a general term covering matters relating to the impact of the project on the environment, communities, and workers.

Occupational Health and Safety (OHS): Occupational Health and Safety aims to protect the safety, health and well-being of those who work or are employed on the project. Compliance with these standards at the highest level is a basic human right that should be guaranteed to every worker.

Gender-Based Violence (GBV): A general term for any harmful act perpetrated against a person has will and **based on the socially attributed (i.e., gender) differences between men and women.** They include acts inflicting physical, sexual, or mental suffering, or threats of such acts; coercion; and other acts of deprivation of liberty. These acts can take place in public or in private. The term GBV is used to highlight the systemic inequality between men and women (which exists in all societies around the world) and which characterizes most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of violence directed against the female sex which causes or is likely to cause women harm or physical, sexual or psychological suffering". The main types of GBV are⁶⁰:

- **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis, other body part or an object.
- **Sexual Assault:** any form of non-consensual sexual contact even if it does not result in penetration. For example, attempted rape, as well as unwanted kisses, fondling, or touching the genitals and buttocks. Other sexual assault types are:
 - **Sexual exploitation:** Taking or attempting to take advantage of a state of vulnerability, unequal power, or trust for sexual purposes, including but not limited to gaining pecuniary benefit, social or political (UN Glossary on Sexual Exploitation and Abuse, 2017, p.6).
 - **Sexual abuse:** Any physical intrusion of a sexual nature committed by force, coercion or in favor of an unequal relationship, or the threat of such intrusion (UN Glossary on Sexual Exploitation and Abuse, 2017, p.5).
 - **Sexual harassment:** sexual advances, requests for sexual favors and any other verbal or physical behavior of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts, but it always involves power and gender dynamics in which a person in power uses their position to harass another based on their gender. Sexual behavior is undesirable when the person experiencing it deems it undesirable (e.g., looking up and down at someone, kissing or making sexual innuendoes by making noises; brushing against someone; whistling and making calls, giving personal gifts).
 - **Sexual favors:** a form of sexual harassment that includes making promises of favorable treatment (e.g., promotion) or threats of unfavorable treatment (e.g., loss of employment) based on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
- **Physical assault:** an act of physical violence that is not sexual in nature. Examples: hitting, slapping, choking, hurting, shoving, burning, shooting, or using a weapon, attacking with acid or any other act that causes pain, physical discomfort, or injury.
- **Forced marriage:** the marriage of an individual against their will.
- **Denial of resources, opportunities, or services:** deprivation of legitimate access to economic resources/assets or means of subsistence, education, health, or other social services (e.g., a deprived widow an inheritance; income taken away by an intimate partner or a member of his family; a woman prevented from using contraceptives; a girl prevented from attending school, etc.)
- **Psychological/emotional abuse:** the infliction of mental or emotional pain or harm. Examples: threats of physical or sexual violence, intimidation, humiliation, forced isolation, harassment,

⁶⁰ Adapted from 6 types of GBV defined by Gender Based Violence Information Management System- <http://gbvims.com/wp/wp-content/uploads/Annex-B-Classification-Tool.pdf>

stalking, unwanted solicitation, unwanted and/or threatening written remarks, gestures or words of a sexual nature, destruction of expensive objects, etc.

Child abuse (VAC): physical, sexual, emotional and/or psychological harm, neglect, or negligent treatment of minor children (i.e., under the age of 18).

This include the fact that a child is exposed to such harm to a third party, which results in actual or potential harm to their health, survival, development, or dignity, in the context of a relationship of responsibility, trust or power.

This includes the use of children for profit, labor, sexual gratification or any other personal or financial advantage. It also includes other activities like using computers, cell phones, video devices, digital cameras, or any other means to exploit or harass children or to access child pornography.

Malicious solicitation of children: These behaviors allow an aggressor to gain the trust of a child for sexual purposes. This is how an offender may establish a relationship of trust with the child and then seek to sexualize that relationship (for example, by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Malicious solicitation of children on the Internet: is the sending of electronic messages with indecent content to a recipient whom the sender believes to be a minor, with the intention of inducing the recipient to engage in or submit to sexual activity, including understood but not necessarily the sender.

Accountability Measures and Confidentiality: Measures instituted to ensure the confidentiality of survivors and to hold contractors, consultants, and the client accountable for establishing a fair system for handling GBV cases and VAC.

Contractor's Environmental and Social Management Plan (E-ESMP) : the plan prepared by the Contractor that describes how it will carry out the activities of the works in accordance with the project's Environmental and Social Management Plan (ESMP).

Child: term used interchangeably with the term “minor” which means a person under the age of 18. This is in accordance with Article 1 ^{Of} the United Nations Convention on the Rights of the Child.

Child protection: activity or initiative aimed at protecting children from all forms of harm, in particular arising from VAC.

Consent: is the informed choice underlying a person's intention, acceptance, or free and voluntary agreement. There can be no consent where such acceptance or agreement is obtained by threat, force or other forms of coercion, kidnapping, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that children under the age of 18 cannot give consent, even if the national legislation of the country where the Code of Conduct is introduced considers sexual majority at a younger age. Lack of knowledge of the child's age and the latter's consent cannot be invoked as a means of defense.

Consultant: any firm, company, organization, or other institution that has been awarded a contract to provide consultancy services in connection with the project and has hired managers and/or employees to carry out this work.

Contractor: any business, corporation, organization, or other institution that has been awarded a contract

to provide construction services for the project and has hired managers and/or employees to perform that work. This includes subcontractors hired to perform activities on behalf of the contractor.

Employee: any person who provides labor to the Contractor or Consultant in country, on-site or off-site, under a contract or labor agreement for a salary, performed formally or informally (including unpaid interns and volunteers), without responsibility for managing or supervising other employees.

SEA/SH and VAC Incident Allegation Procedure: prescribed procedure for reporting SEA/SH or VAC incidents.

SEA/SH and VAC Code of Conduct: Code of conduct adopted for the project covering corporate commitment and accountability of managers and individuals regarding SEA/SH and VAC.

GBV and VAC Compliance Team (CT): A team set up by the project to deal with SEA/SH and VAC issues.

Grievance Mechanism (GM): The process established by a project to receive and handle complaints.

Manager: any person offering labor to a contractor or consultant, on site or off, under a formal or informal contract of employment and in exchange for a salary, with the responsibility for controlling or directing the activities of a contractor or consultant's team, unit, division or similar and with responsibility for supervising and managing a predefined number of employees.

Perpetrator: the person(s) who commits or threatens to commit an act or acts of SEA/SH or VAC.

Intervention protocol: mechanisms put in place to intervene in cases of SEA/SH and VAC (see Section 4.7 Intervention protocol).

Survivor(s): the person(s) adversely affected by SEA/SH or VAC. Women, men and children can be survivors of SEA/SH; only children can be survivors of VAC.

Site: the place where the infrastructure development work under the project takes place. Consultancy assignments are considered to have as their site the places where they take place.

Site environment: the “project area of influence” which is any place, urban or rural, directly affected by the project, including human settlements.

Codes of Conduct

This chapter presents three Codes of Conduct to use:

- i. **Company Code of Conduct:** Commits the company to addressing SEA/SH and VAC issues
- ii. **Manager's Code of Conduct:** Commits managers to implement the Company's Code of Conduct, including those that are signed by individuals; and
- iii. **Individual Code of Conduct:** Code of conduct for everyone working on the project, including managers.

Company Code of Conduct

Prevention of Sexual Exploitation and Abuse, Sexual Harassment and violence against children

The company is committed to ensuring that the project is implemented in a way that minimizes any negative impact on the local environment, communities, and its workers. To do this, the company will comply with Environmental, Social, Health and Safety (ESHS) standards and ensure that the appropriate Occupational Health and Safety (HST) 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) do not take place – they will not be tolerated by any employee, contractor, supplier, associate, or representative of the Company.

Therefore, to ensure that everyone involved in the project is aware of this commitment, the company is committed to the following fundamental principles and minimum standards of behavior, which will apply without exception to all employees, associates, and company representatives, including contractors and suppliers:

General

1. The company - and therefore all employees, associates, representatives, contractors, and suppliers - agrees to comply with all relevant national laws, rules, and regulations.
2. The company undertakes to fully implement its “Entrepreneurs' Environmental and Social Management Plan” (E-PGES).
3. The company is committed to treating women, children (persons under the age of 18) and men with respect, regardless of their race, color, language, religion, political or other opinion, national, ethnic, or social origin, level of wealth, disability, citizenship, or other status. Acts of Sexual Exploitation and Abuse/Sexual Harassment and VAC constitute a breach of this commitment.
4. The company ensures that interactions with members of the local community take place with respect and in the absence of discrimination.
5. Language and behavior that is demeaning, threatening, harassing, abusive, culturally, or sexually inappropriate, or provocative is prohibited among all Company employees, associates, and representatives, including contractors and suppliers.
6. The company will follow all reasonable work instructions (including those relating to environmental and social standards).
7. The company will protect the assets and ensure their proper use (for example, prohibit theft, negligence, 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 personnel, as well as contractors and suppliers.
9. The company will ensure that all persons on the job site wear the appropriate Personal Protective Equipment (PPE) as prescribed, to prevent avoidable accidents and to report conditions or practices that pose a safety risk or threaten the environment.
10. The company :
 - i. Prohibit the consumption of alcohol during work
 - ii. Prohibit the use of narcotics or other substances that may impair faculties at any time

11. The company will ensure that adequate sanitary facilities are available for workers on site and in all project worker accommodation.

Sexual Exploitation and Abuse, Sexual Harassment and violence against children

12. The actions of SEA/SH and VAC constitute serious misconduct and may therefore result in sanctions, including penalties and/or dismissal, and, if appropriate, referral to the police for further action.
13. All forms of SEA/SH and VAC, including the solicitation of children, are unacceptable, whether they take place in the workplace, in the vicinity of the workplace, in work camps or in the local community.
 - i. Sexual harassment - for example, making unwanted sexual advances, asking for sexual favors, or engaging in verbal or physical behavior that has a sexual connotation, including subtle acts, is prohibited.
 - ii. Sexual favors — for example, it is prohibited to promise or perform favors conditioned on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
14. Any sexual contact or activity with children under the age of 18, including through digital media, is prohibited. Lack of knowledge of the child's age cannot be invoked as a defense. Nor can the child's consent constitute a defense or an excuse.
15. Unless there is full consent without reservation⁶¹ from all parties involved in the sexual act, sexual interactions between Company employees (at any level) and members of the surrounding communities are prohibited. This includes relationships involving the withholding/promising of a benefit (monetary or non-monetary) to members of the community in exchange for sexual activity – such sexual activity is considered as sexual exploitation and “non-consensual” under this Code.
16. In addition to the sanctions applied by the company, legal proceedings against the authors of acts of the SEA/SH or VAC will be initiated, if necessary.
17. All employees, including volunteers and contractors, are strongly encouraged to report suspected or actual acts of SEA/SH and/or VAC committed by a colleague, whether at the same company or not. Reports must be submitted in accordance with the project's SEA/SH and VAC Allegation Procedures.
18. Managers are required to report suspected or actual acts of SEA/SH and/or VAC and act accordingly, as they are responsible for upholding company commitments and holding their direct reports accountable for such actions. acts.

Implementation

To ensure that the principles set out above are effectively implemented, the company undertakes to ensure that:

19. All managers sign the project's “Managers' Code of Conduct”, which details their responsibilities, including implementing company commitments and enforcing the obligations of the “Individual Code of Conduct”.

⁶¹ Full consent without reservations in the context of economic and social power differences between the company employees and the community members might be very hard to prove therefor company

employees at any level are strongly discourage of initiating any sexual interactions with community members.

20. All employees sign the project's "Individual Code of Conduct" confirming their commitment to comply with ESHS and HST standards, and not to engage in activities resulting in SEA/SH or VAC.
21. Company and individual Codes of Conduct should be prominently displayed in work camps, offices and in public areas of the workspace. Examples of these spaces are the waiting, rest and reception areas of the sites, the canteens, and the health centers.
22. Posted and distributed copies of the Company Code of Conduct and the Individual Code of Conduct must be translated into the appropriate language used in the worksite areas as well as the native language of any international personnel.
23. A designated person should be appointed as the company's " Focal Point " for handling SEA/SH and VAC matters, including representing the company on the Compliance Team (CT) against SEA/SH and the VACs, which is composed of representatives of the client, the contractor(s), the supervision consultant, and the local service provider(s).
24. In consultation with the Compliance Team (CT), an effective Action Plan should be developed, which should include at least the following provisions:
 - i. SEA/SH and VAC Incident **Allegation Procedure** for reporting SEA/SH and VAC incidents through the Complaints Mechanism;
 - ii. **Accountability and confidentiality measures** to protect the privacy of all involved ; and
 - iii. The **Response Protocol** for survivors and perpetrators of SEA/SH and VAC.
25. The company shall effectively implement the final agreed Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Prevention and Response Action Plan, making informs the Compliance Team (CT) of possible improvements and updates, if necessary.
26. All employees must complete an orientation course before commencing work on site to ensure they are aware of the company's commitments to ESHS and HST standards, as well as Codes of Conduct on site and its Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) measures.
27. All employees must attend a mandatory training course once a month for the duration of the contract, starting with an initial training at the time of entry into service before the start of work, to reinforce the understanding of ESHS and HST standards as well as the SEA/SH and VAC measures and Code of Conduct.

I hereby acknowledge having read the above Company Code of Conduct and agree on behalf of the company, to abide by the standards contained therein. I understand my role and responsibilities to support the Occupational Health and Safety (OHS) standards and the Environmental, Social, Health (ESH) and Safety (ESHS) standards of the project, and to prevent and combat acts of SEA/SH and VAC. I understand that any action inconsistent with this Code of Business Conduct or failure to act in accordance with this Code of Business Conduct may result in disciplinary action.

Company Name: _____

Signature: _____

Name in full: _____

Title: _____

Date: _____

Manager's code of conduct

Implementation of ESHS and HST standards Prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC)

Managers at all levels should uphold the company's commitment to implement Environmental, Social, Health and Safety (ESHS) standards and Health and Safety requirements in the workplace. Work (HST), as well as to prevent and deal with SEA/SH and VAC. This means that managers have a heavy responsibility to create and maintain an environment that meets these standards and helps prevent SEA/SH and VAC. They must support and promote the implementation of the Company's Code of Conduct. To this end, they must comply with the Manager's Code of Conduct and sign the Individual Code of Conduct. In doing so, they undertake to support the implementation of the Contractors Environmental and Social Management Plan (E-ESMP) and the Occupational Health and Safety (HST) Standards Management Plan, as well as to develop systems that facilitate the implementation of the SEA/SH and VAC Action Plan. They must ensure a safe workplace as well as a SEA/SH and VAC free environment both in the workplace and in local communities. These responsibilities include, but are not limited to:

Implementation

1. Ensure maximum effectiveness of the Company Code of Conduct and the Individual Code of Conduct:
 - i. Visibly display the Company Code of Conduct and Individual Code of Conduct by prominently displaying them in work camps, offices, and public areas of the workplace. Examples of areas include venue waiting, rest and reception areas, canteens, and healthcare facilities;
 - ii. Ensure that all posted and distributed copies of the Company Code of Conduct and Individual Code of Conduct are translated into the appropriate language that is used in the workplace as well as the native language of any international employee.
2. Explain orally and in writing the Company Code of Conduct and the Individual Code of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the "Individual Code of Conduct", confirming that they have read and agree to it;
 - ii. Staff rosters and signed copies of the Individual Code of Conduct are provided to the OHS manager, the Compliance Team (CT) and the client;
 - iii. Participate in training and ensure that staff also participate, as detailed below;
 - iv. Establish a mechanism for staff to:
 - a) Report concerns regarding compliance with ESHS standards or HST standards requirements; and
 - b) Confidentially report incidents of SEA/SH or VAC through the Complaints and Grievances Mechanism
 - v. Staff members are encouraged to report suspected and proven issues related to ESHS standards and HST requirements, SEA/SH, or VAC, emphasizing the responsibility of staff to the company and country where they work and respecting the principle of confidentiality.

4. In accordance with applicable laws and to the best of your ability, prevent perpetrators of sexual exploitation and abuse from being hired, rehired, or deployed. Check the backgrounds and criminal records of all employees.
5. Ensure that when entering partnership, subcontracting, supplier or similar agreements, these agreements:
 - i. Include in appendices the codes of conduct on ESHS standards, HST requirements, SEA/SH, and VAC;
 - ii. Incorporate appropriate language requiring such contracting entities and individuals under contract, as well as their employees and volunteers, to comply with the Individual Code of Conduct;
 - iii. Expressly state that the failure of such entities or individuals, as the case may be, to ensure compliance with ESHS standards and HST requirements ; to take preventive measures to combat SEA/SH and VAC ; to investigate related allegations or take corrective action when acts of SEA/SH and VAC are committed – all of this is not only grounds for sanctions and penalties under individual Codes of Conduct, but also grounds for termination project work or service agreements.
6. Provide support and resources to the Compliance Team (CT) on SEA/SH and VAC to create and disseminate internal awareness initiatives through the outreach strategy under the SEA/SH Action Plan against SEA/SH and VAC.
7. Ensure that any SEA/SH or VAC issues warranting police action are immediately reported to law enforcement⁶², the client and the World Bank.
8. Report any suspected or proven acts of SEA/SH and/or VAC and respond in accordance with the Response Protocol , as managers have the responsibility to uphold the commitments of the company and to hold their subordinates directly responsible for their actions.
9. Ensure that any major incidents related to ESHS standards or HST requirements are reported immediately to the client and the supervising engineer.

Training

10. Managers are responsible for:
 - i. Ensure that the OHS Standards Management Plan is implemented, accompanied by adequate training for all staff, including contractors and suppliers;
 - ii. Ensure that staff have an adequate understanding of the E-ESMP and receive the necessary training to implement its requirements.
11. All managers are required to complete a Manager Induction course before commencing work on site to ensure they are aware of their roles and responsibilities with respect to compliance with both SEA/SH and VAC aspects of these Codes of Conduct. This training will be separate from the pre-service training required of all employees and will provide managers with the proper understanding and technical support needed to begin developing the Action Plan to address issues related to SEA/SH and VAC.
12. Managers are required to attend and contribute to the monthly training courses facilitated by the project and delivered to all employees. They will be required to present training and self-assessments, including encouraging the compilation of satisfaction surveys to assess satisfaction with the training and to provide advice on how to improve its effectiveness.

13. Ensure that there is scheduled time available during working hours for staff to attend the project's mandatory induction training on the following topics:
 - i. HST requirements and ESHS standards; and
 - ii. SEA/SH and VAC; this training is required of all employees.
14. During civil works, ensure that personnel undergo continuous training on HTS requirements and ESHS standards, as well as the mandatory monthly refresher course required of all employees to deal with the increased risk of SEA/SH and of VAC.

Response

15. Managers will need to take appropriate action to respond to any incident related to ESHS standards or HST requirements.
16. Regarding SEA/SH and VAC:
 - i. Contribute to the Procedures relating to allegations of SEA/SH and VAC and the Response Protocol developed by the Compliance Team (CT) in the framework of the final SEA/SH Action Plan approved;
 - ii. Once adopted by the company, managers will need to apply the Accountability and Confidentiality measures set out in the SEA/SH Action Plan, in order to maintain confidentiality about the identity of employees who report or (allegedly) commit acts of SEA/SH and VAC (unless a breach of confidentiality is necessary to protect persons or property from serious harm or if required by law requires);
 - iii. If a manager has any concerns or suspicions about any form of SEA/SH or VAC committed by one of their direct reports or by an employee working for another contractor in the same workplace, they are required to report the case by referring to complaints' mechanisms;
 - iv. Once a sanction has been determined, the managers concerned are supposed to be personally responsible for ensuring that the measure is effectively applied, within a maximum period of 14 days following the date on which the sanction decision was issued;
 - v. If a manager has a conflict of interest due to personal or family relationships with the survivor and/or abuser, they must inform the company concerned and the Compliance Team (CT). The company will be required to appoint another manager who has no conflict of interest to handle complaints;
 - vi. Ensure that any SEA/SH or VAC-related issues warranting police action are immediately reported to law enforcement⁶³, the client, and the World Bank.
17. Managers who do not address incidents related to ESHS standards or HST requirements, or who fail to report incidents related to SEA/SH and VAC and do not comply with the provisions relating to SEA/SH and VAC, may be subject to disciplinary action. This will be determined and issued by the CEO, Managing Director, or equivalent senior manager of the company. These measures may include:
 - i. The informal warning
 - ii. The formal warning
 - iii. Additional training
 - iv. The loss of a maximum of one week's salary

- v. Suspension of the employment relationship (without pay), for a minimum period of one month and a maximum period of six months
- vi. The dismissal.

18. Finally, the failure of managers or the CEO of the company to respond effectively to cases of violence related to Environmental and Social, Hygiene and Health (ESHS) and Occupational Hygiene and Health standards (HST) and responding to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) in the workplace, may result in legal action before national authorities.

I hereby acknowledge that I have read the Manager Code of Conduct above, agree to abide by the standards therein, and understand my roles and responsibilities in preventing and responding to ESHS-related requirements, to HST, SEA/SH and VAC. I understand that any action inconsistent with the Manager's Code of Conduct or failure to act in accordance with this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Name in full: _____

Title: _____

Date: _____

Individual code of conduct

Implementation of ESHS standards and HST requirements

Prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC)

I, _____, acknowledge the importance of complying with Environmental, Social, Health (ESH) and Safety (ESHS) standards, to comply with the project's Occupational Health and Safety requirements (HST) and to prevent Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC).

The company considers that non-compliance with Environmental, Social, Hygiene (ESH) and Safety (ESHS) standards and Occupational Health and Safety (HST) requirements, or failure to participate in activities to fight against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) as well as Violence Against Children (VAC) whether in the workplace – around the workplace, in work camps, workers or in surrounding communities – constitutes serious misconduct and is therefore subject to sanctions, penalties or possible dismissal. Prosecutions can be initiated by the police against the perpetrators of SEA/SH or VAC, if necessary.

While working on the project, I consent to:

1. Attend and actively participate in training courses related to Environmental, Social, Health (ESH) and Safety (ESHS) standards, and Occupational Health and Safety (OHS) requirements, HIV/AIDS, SEA/SH and VAC, as required by my employer
2. Wear my Personal Protective Equipment (PPE) at all times in the workplace or during project-related activities
3. Take all practical measures to implement the Contractors Environmental and Social Management Plan (E-PGES)
4. Implement the HST Management Plan
5. Adhere to a zero-tolerance policy regarding the consumption of alcohol while at work and refrain from consuming narcotics or other substances that may impair my faculties at any time
6. Let the police check my background
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, level of wealth, disability, citizenship, or other status
8. Not address women, children, or men with inappropriate, harassing, abusive, sexually provocative, degrading or culturally inappropriate language or behavior
9. Not engage in sexual harassment – for example, making unwanted sexual advances, asking for sexual favors, or engaging in any other verbal or physical behavior with a sexual connotation. Including subtle acts of such behavior (for example, staring at someone one up and down kissing or blowing kisses making sexual innuendos by making noises; brushing against someone; whistling; giving personal gifts; making comments about someone's sex life, etc.).
10. Not engage in sexual favors – for example, making promises or making favorable treatment conditional on sexual acts – or other forms of humiliating, degrading or abusive behavior
11. Not engage in sexual contact or activity with children (persons under the age of 18) – including the malicious solicitation of children – or contact through digital media; ignorance of the child's age cannot be invoked as a defense; nor can the child's consent constitute a defense or an excuse;

12. Unless full consent without reservations is obtained⁶⁴ of all parties concerned, not to have sexual interactions with members of neighboring communities; this definition includes relationships involving the refusal or promise to actually provide a benefit (monetary or non-monetary) to members of the community in exchange for sexual activity – such sexual activity is considered sexual exploitation and “non-consensual” for purposes of this Code
13. Consider reporting through the complaints and grievances mechanisms or to my manager any suspected or proven cases of SEA/SH or VAC committed by a co-worker, whether co-worker is employed by my company, or any violation of this Code of Conduct.

For children under the age of 18:

14. Whenever possible, ensure that another adult is present when working near children.
15. Not to invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or physical danger
16. Do not use computers, mobile phones, video devices, digital cameras or any other medium to exploit or harass children or to access child pornography (see also the section " Use of images of 'children for professional purposes ' below)
17. Refrain from corporal punishment or disciplinary action against children
18. Refrain from engaging children under the age of 14 for domestic work or any other work, unless national law sets a higher age or exposes them to a significant risk of injury
19. Comply with all relevant local laws, including labor laws relating to child labor and World Bank safeguard policies on child labor and minimum age
20. Take the necessary precautions when photographing or filming children (refer to Annex 2 for further details).

Use of images of children for professional purposes

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

21. Before photographing or filming a child, assess and endeavor to respect local traditions or restrictions on the reproduction of personal images
22. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian; to do this, I have to explain how the photograph or film will be used;
23. Ensure that photographs, films, videos, and DVDs present children in a dignified and respectful manner, and not in a vulnerable or submissive manner; children should be dressed appropriately and not strike poses that could be considered sexually suggestive
24. Ensure images are honest representations of context and facts
25. Ensure that file tags do not reveal information that identifies a child when sending images electronically.

⁶⁴ Full consent without reservations in the context of economic and social power differences between the company employees and the community members might be very hard to prove therefor company employees at any level are strongly discourage of initiating any sexual interactions with community

members.

Penalties

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

1. The informal warning
2. The formal warning
3. Additional training
4. Loss of up to one week's salary
5. Suspension of the employment relationship (without pay), for a minimum period of one month and a maximum period of six months
6. The dismissal
7. Reporting to the police, if applicable

I understand that it is my responsibility to ensure that environmental, social, health and safety standards are met. That I will comply with the Occupational Health and Safety Management Plan. That I will avoid acts or behaviors that could be construed as SEA/SH and VAC. Any such act will constitute a violation of this Individual Code of Conduct. I hereby acknowledge that I have read the aforementioned-Individual Code of Conduct, agree to abide by the standards therein, and understand my roles and responsibilities in preventing and responding to cases related to ESHS standards and requirements HST, SEA/SH and VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to act in accordance with this Individual Code of Conduct could result in disciplinary action and impact my continued employment.

Signature: _____

Name in full: _____

Title: _____

Date: _____

ANNEX 3. SUB-PROJECT SOCIAL AND ENVIRONMENTAL SCREENING FORM AND GUIDELINES

Date:

Location:

Region/community:

Name:

Job title:

Telephone numbers:

E-mail address:

Signature:

Section B

Project activity (for each project site select one project activity at a time and evaluate its impacts, mitigation, and adaptation measures by using the checklist in Section C).

SECTION C: Check List

This ESMF analyses the potential adverse impacts of implementing the project by looking at the probability, scale, significance and scope, magnitude, duration, reversibility, and availability of effective mitigation measures. It employs a rating scale of 1-3 with a scale of 3 denoting high impact, 2 denoting Medium/low significance impact and 1 denoting null/insignificant impact.

Section B

Project activity (for each project site select one project activity at a time and evaluate its impacts, mitigation, and adaptation measures by using the checklist in Section C).

SECTION C: Check List

This ESMF analyses the potential adverse impacts of implementing the project by looking at the probability, scale, significance and scope, magnitude, duration, reversibility, and availability of effective mitigation measures. It employs a rating scale of 1-3 with a scale of 3 denoting high impact, 2 denoting Medium/low significance impact and 1 denoting null/insignificant impact

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Project Siting				
Will the activity compete for the following use to which you put the land?	Yes			
Trees		Low significant impact		-Replanting of the number of trees cut within the TVET site 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
Water		Low significant impact		
Forest in your surrounding			Insignificant impact	

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Potential Environmental and Social Impacts				
Will the activity increase the following issues in the country?	YES			
Paper waste	High significant impact			Regular collection and evacuation of work site refuse in authorized dumps
Plastic waste	High significant impact			Regular collection and evacuation of work site refuse in authorized dumps
Liquid waste	High significant impact			Improve the hygiene around water supply points and promote personal hygiene in project sites
Will the activity increase the need for security and safety during implementation?	High significant impact			Put in place safety measures to reduce intruders to the project site.
Will the activity affect drainage in the surrounding?		Low significant impact		Design traffic deviation plans approved by the concerned administrative authorities; Make careful selection of installation sites.
Loss of land, restriction of access to land or resources			Insignificant impact	Preparation of a RAP for the Project
Economic activities impacts of the affected communities			Insignificant impact	
Impacts on communities' livelihood			Insignificant impact	

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Project Siting				
Does the Activity take place in a densely populated area?			Insignificant impact	

<p>Are there dwellings in the area?</p> <p>Businesses and other livelihood activities?</p> <p>Essential services (i.e. transmissions lines, schools, hospitals, etc.)</p> <p>List types of dwellings and livelihood activities</p>			Insig nifica nt impa ct	
<p>Adjacent to or within any environmentally or socially sensitive areas, such as cultural sites, protected area, wetland, mangrove, estuarine, bay, near cemetery or community assets?</p>			Insig nifica nt impa ct	
Potential Environmental Impacts				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Are there any environmentally sensitive areas that could be adversely affected by the activity?			Insignifi cant impact	
Are there any threatened species that could be adversely affected by the Activity			Insignifi cant impact	
Are there potentials of introducing alien species due to the activity?			Insignifi cant impact	
Are there land use changes that are likely to affect ecosystems and services due to the activity?			Insignifi cant impact	
Will the activity affect ground water recharge due to excessive extraction of water for irrigation?			Signific ant impact	
Is there a need to cut down any trees?			Insignifi cant impact	
Will the activity affect the aesthetic attractiveness of the local landscape?			Insignifi cant impact	
Will the project generate temporary or permanent traffic disturbances, interfere with or block access, routes etc. (for people, livestock, and wildlife) or traffic routing and flows, due to construction material transport and wastes?			Insignifi cant impact	
Land Acquisition and/or Resettlement				
Will involuntary resettlement, land acquisition, relocation of property, or loss, denial, or restriction of access to land and other economic resources (i.e., crop fields and rivers) be caused by the activity?			Insignifi cant impact	Preparation of a RAP for the project
Would the activity lead to dislocation or involuntary resettlement of people?			Insignifi cant impact	Preparation of a RAP for the project
Will the activity involve restriction on access of land, livelihood and economic displacement?			Insignifi cant Impact	Preparation of a RAP for the project
Is this impact permanent or temporary?				

Will the project impact sensitive communities or vulnerable persons or groups? (for example: vulnerable livelihoods, elderly, persons with disabilities, youth/children, women)?	High significant impact			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
Noise and Air Emissions				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Will this activity increase GHG emissions in the energy sector?			Low significant impact	
Will this activity increase GHG emissions in the Industrial Processes and Product Use Sector (IPPU)?			Insignificant impact	
Will this activity increase GHG emissions in the Agriculture, Forestry and Other Land use sector?			Low significant impact	
Will this activity increase GHG emissions in the Waste sector?			Insignificant impact	
Will the operating noise level from the equipment use in this activity exceed the allowable decibel level or noise limits?			Insignificant impact	
Will the activity cause smell, and an influx of insects, rodents, etc.?				
Solid or Liquid Wastes Generation				
Will the activity generate solid, liquid, or hazardous wastes? (Including shipping and package waste, domestic and sanitation waste, asbestos, PCB etc.)	High significant impact			Ensure that burning of reuse takes place at least 100 m from the work site
Will the activity cause impairment of downstream water quality, risk causing contamination of drinking water, inadequate wastewater treatment or release of untreated wastewater/sewage?	High significant impact			Install work sites far from waterways Regular collection of work sites refuse towards authorized dumps
Will the activity generate chemical contamination of soil and ground water?	High significant impact			Ensure adequate spacing between latrines and water supply points
Occupational health hazards				

Will this require a large number of staff and workers; large/long-term construction camp?	High significant impact			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
Do you have an estimate of how many workers will be employed in this activity?	Not yet			
Will you hire workers from the local community?	High significant impact			Prioritize hiring local labor and ensure transparent and fair hiring practices, including the recruitment of women, and in non-traditional and supervisory roles where possible

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Would this activity create social conflict between construction workers from other areas and community workers?		Low significant impact		Prioritize hiring local labor and ensure transparent and fair hiring practices, including the recruitment of women, and in non-traditional and supervisory roles where possible
Is there a concern about labor influx on community health and safety including transmission of communicable diseases and SEA/SH?				Include SEA/SH mitigation measures in all contracts, including for supervision consultants, and include SEA/SH and VAC in the curriculum for teacher training.
Do you agree, monitor, and comply with the labor recruitment policy and apply the core labor standards (i.e., freedom of association, prohibition of child labor, prohibition of discrimination, and prohibition of forced labor; equal pay, safe working conditions, social security)?	High significant impact			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.
Are the infrastructure of this activity prone to hazards, risks and could they result in accidents and injuries to workers?				Conduct an awareness raising campaign for the work sites and the local community Reduce speed limits for vehicles travelling through the community
Will the infrastructure of this activity require frequent maintenance and/or repair?			Insignificant	
Gender/inclusion questions				
Do you have a policy related to supporting the rights of women and ensuring women's participation in this activity?	Yes			Gender policies are there to protect the rights of women, children and vulnerable people
Are there any specific benefits provided to women? (e.g., maternity/childbearing insurance, day shift arrangements for mothers)	Yes			Maternity leave for nursing mothers
Is there any opportunity to promote opportunities or empowerment of women/elderly/persons with disabilities/youth in this activity?	Yes			-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

				Initiate sensitization and education programs for youths and person with disability to create social inclusion.
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Public Consultation and Disclosure

Has public consultation and participation been sought?

Yes _____ No _____

If no, why not

If yes, when, where and with whom

A. PROJECT CONTEXT AND JUSTIFICATION

Project Context

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

Justification

2. [In this section, you need to 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.⁷⁴ The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct,⁷⁵ indirect⁷⁶ and cumulative⁷⁷ environmental and social risks and impacts.
4. (including those related to gender based violence (GBV) and sexual exploitation and abuse/sexual harassment (SEA/SH) throughout the project life cycle, including those specifically identified in the Environmental and Social Standards (ESSs) 2–10 of the World Bank’s Environmental and Social Framework (ESF).
5. 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 hierarchy⁷⁸ for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project. The ESIA will include stakeholder engagement as an integral part of the assessment, in accordance with ESS 10.
6. The ESIA will be an adequate, accurate, and objective evaluation and presentation of the known risks and impacts, prepared by qualified and experienced persons.
7. The Borrower will ensure that the ESIA considers in an appropriate manner all issues relevant to the project, including:

⁷⁴This may include preconstruction, construction, operation, decommissioning, closure and Reinstatement/restoration.

⁷⁵ A direct impact is an impact which is caused by the project and occurs contemporaneously in the location of the project.

⁷⁶ 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.

⁷⁷ 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.

⁷⁸ See paragraph 8, 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 issues⁷⁹;
- 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;
- Recognition of ethnic minorities or indigenous peoples (if applicable), rights of women, rights of the child, migrant workers, persons with disabilities, etc.,
- Including the institutions responsible for the policy and legal framework.
- Applicable requirements under the ESSs; and the Environmental and Health Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP).⁸⁰

8. 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;⁸¹ and
- iv. Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.⁸²

9. 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:

10. **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 services⁸³ and the use of living natural resources, such as fisheries and forests

⁷⁹ This should include the description of policies and laws related to gender discrimination and GBV, sexual exploitation and abuse (SEA) and sexual harassment, as well as child protection. This includes any laws or policies regulating the relationship between women and men both in professional and private spheres of life and/or existing gender country diagnostics or country action plans or strategies addressing GBV.

⁸⁰ 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.

⁸¹ 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.

⁸² 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.

⁸³ 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

11. **Social risks and impacts, including:** (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence⁸⁴;
12. (ii) risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable;⁸⁵
13. (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 or vulnerable;
14. (iv) Cultural, gender, and social norms and practices, particularly those which are harmful to women and girls and that would be exacerbated because of project implementation.
15. This includes power dynamics, division of labor and participation in decision-making processes in both professional and private spheres;
16. (v) existing data regarding GBV, including data on partner/non-partner sexual violence and physical violence, SEA/SH, intimate partner violence, family violence, early marriage, and harmful traditional practices, especially those particularly at risk of being exacerbated by project implementation⁸⁶;
17. (vi) negative economic and social impacts relating to the involuntary taking of land or restrictions on land use;
18. (v) risks or impacts associated with land and natural resource tenure and use,⁸⁷ including (as relevant) potential project impacts on local land use patterns and arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources;
19. (vi) Impacts on the health, safety and well-being of workers and project-affected communities; and (vii) risks to cultural heritage.
20. Where the ESIA identifies specific individuals or groups as disadvantaged or vulnerable, women and girls, 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.
21. For projects involving multiple small subprojects,⁸⁸ 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, as follows: (a) High Risk subprojects, in accordance with the ESSs; (b) Substantial

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.

⁸⁴ This includes Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

⁸⁵ 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.

⁸⁶ Potential sources of this information include data from the Demographic and Health Surveys

and from the Gender Sustainable Development Goals.

⁸⁷ 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.

⁸⁸ 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. Risk, Moderate Risk and Low Risk subprojects, in accordance with national law and any requirements of the ESSs that the Bank deems relevant to such subprojects.⁸⁹

22. If the risk rating of a subproject increases to a higher risk rating, the Borrower will apply the relevant requirements of the ESSs and the project Environmental and Social Commitment Plan (ESCP) will be updated as appropriate.

23. The ESIA will also identify and assess, to the extent appropriate, the potential environmental and social risks and impacts of Associated Facilities. The Borrower will address the risks and impacts of Associated Facilities in a manner proportionate to its control or influence over the Associated Facilities. To the extent that the Borrower cannot control or influence the Associated Activities to meet the requirements of the ESSs, the environmental and social assessment will also identify the risks and impacts the Associated Facilities may present to the project.

24. For projects that are High Risk or contentious or that involve serious multidimensional environmental or social risks or impacts, the Borrower may be required to engage one or more internationally recognized independent experts. Such experts may, depending on the project, form part of an advisory panel or be otherwise employed by the Borrower, and will provide independent advice and oversight to the project.⁹⁰

25. The ESIA will also consider risks and impacts associated with the primary suppliers⁹¹ as required by ESS 2 and ESS 6. The Borrower will address such risks and impacts in a manner proportionate to the Borrower's control or influence over its primary suppliers as set out in ESS2 and ESS6.

26. 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,⁹² climate change mitigation, adaptation, and resilience issues, and impacts on threatened or depleted migratory species and their habitats.

C. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

27. As set out in ESS 10, 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.

28. The ESIA must include a description of how the Borrower will propose and implement a grievance mechanism (GM) to address these concerns and receive complaints, including SEA/SH complaints, and facilitate their resolution. This description would be derived from the Stakeholder Engagement Plan (SEP). The ESIA will clearly define roles, responsibilities and

⁸⁹ Where subprojects are likely to have minimal or no adverse environmental or social risks and impacts, such subprojects do not require further environmental and social assessment following the initial scoping.

⁹⁰ This requirement relates to the independent advice and oversight of such projects and is not related to circumstances in which the Borrower will be required to retain independent specialists to carry out environmental and social assessment. ⁹¹ Primary suppliers are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project. Core functions of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue.

⁹² This includes all greenhouse gases (GHGs) and black carbon (BC).

accountabilities and designate the persons who will be responsible for implementing and monitoring stakeholder engagement activities and ensuring compliance with national laws and regulations, as well as the requirements of the World Bank ESF.

29. For High Risk and Substantial Risk projects, the Borrower will provide to the Bank and disclose documentation, as agreed with the Bank, relating to the environmental and social risks and impacts of the project prior to project appraisal. The documentation will address, in an adequate manner, the key risks and impacts of the project, and will provide sufficient detail to inform stakeholder engagement and Bank decision making. The Borrower will provide to the Bank and disclose final or updated documentation as specified in the ESCP.
30. 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. The Borrower will disclose an updated ESCP, setting out the mitigation measures.

D. PROJECT MONITORING AND REPORTING

31. The Borrower will monitor the environmental and social performance of the project in accordance with the legal agreement (including the ESCP). 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. Where appropriate and as set out in the ESCP, 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.
32. 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.
33. The Borrower will provide regular reports as set out in the ESCP (in any event, 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, including compliance with the ESCP and the requirements of the ESSs. Such reports will include information on stakeholder engagement conducted during project implementation in accordance with ESS10. The Borrower, and the agencies implementing the project, will designate senior officials to be responsible for reviewing the reports.
34. Based on the results of the monitoring, the Borrower will identify any necessary corrective and preventive actions and will incorporate these in an amended ESCP or the relevant management tool, in a manner acceptable to the Bank. The Borrower will implement the agreed corrective and preventive actions in accordance with the amended ESCP or relevant management tool and monitor and report on these actions.

35. 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

36. 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).
37. The Environmental and Social Management Framework (ESIA) of the project will also have to comply with the country's environmental legislation.
38. 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.
39. 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 [COUNTRY] 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
 - include an action plan with mitigation measures for GBV-related risks following the recommendations of the Good Practice Note for Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works for projects involving major infrastructure⁹³;
 - ensure the stakeholder engagement plan includes disadvantaged/vulnerable groups and individuals such as non-readers, women,⁹⁴ children and youth, the elderly, indigenous peoples (if applicable) and other racial, ethnic, and religious minorities, displaced persons, and persons with disabilities, 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 vulnerable 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;

⁹³ <http://documents.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

⁹⁴ Women, and adolescent girls where feasible, should be consulted in sex-segregated groups with female facilitators to encourage open discussion on GBV risks and VULNERABILITIES in the context and how the project may have both negative and positive impacts on their lives. Only general information about trends, risks, obstacles should be sought without any questions on individual

experiences of violence. Prior to consultations with women, the Consultant should identify a GBV service provider where women who have experienced violence could be referred should any of them disclose this information during or after group discussion.

- 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;⁹⁵
- 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 (i.e. the SEP should not be replicated). The consultations, especially those with women, should follow ethical considerations related to GBV data collection. No GBV prevalence data or data on individual GBV incidents should be collected;
- m) Include in a matrix the dates of consultation for the ESIA/ESMP, location, summarizing key issues discussed and concerns raised by stakeholders and responses given to them (and if any follow up is needed to resolve concerns, changes to project design needed, etc.). The annex should include names of those present but in the matrix of discussions, names should be removed).
- n) Develop a monitoring and evaluation mechanism to ensure systematic and effective monitoring of the main ESIA recommendations;
- o) 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

(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.
- Compares the Borrower's existing environmental and social framework and the ESSs
- and identifies the gaps between them.

⁹⁵ 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. If the project includes one or more elements of capacity strengthening, these elements will be subject to periodic monitoring and evaluation as required by ESS 1, 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 the ESF.
- 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 specifically identified in the ESF and any other 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.

(i) Key Measures and Actions for the Environmental and Social Commitment Plan (ESCP)

- Summarizes key measures and actions and the timeframe required for the project to meet the requirements of the ESSs. This will be used in developing the (ESCP).

(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.

ANNEX 5: 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 document⁹⁶ or the content may be incorporated directly into the ESCP. 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 Indigenous Peoples, involuntary resettlement, labor and working conditions, SEA/SH, stakeholder engagement and grievance resolution, 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. considers, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

(b) Monitoring

- 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.⁹⁷
- 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.

⁹⁶ 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.

⁹⁷ 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.

(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 (either stand alone or as incorporated into the ESCP) 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.

ANNEX 6: Outline of a Contractor's Environmental and Social Management Plan (C-ESMP)

(The ESMP-C will be prepared by each contractor in charge of a site of a certain size (number of workers, scope, and duration of work, etc.).

A simplified outline will be used for minor work by small construction companies).

1. ENVIRONMENTAL AND SOCIAL POLICY OF THE CONTRACTOR
2. OBJECTIVES OF THE C-ESMP
 - 2.1 Preparation of the C-ESMP
 - 2.2 Contractor's Responsibilities
 - 2.3 Prime Contractor's Responsibilities
 - 2.4 Monitoring
 - 2.5 Implementing and Updating the C-ESMP
3. ENVIRONMENTAL MANAGEMENT SYSTEM
 - 3.1 Responsibilities
 - 3.2 Subcontracting
 - 3.3 EHS Planning Document
 - 3.4 Application for site approval
 - 3.5 Non-compliance management
 - 3.5 Human resources
 - 3.6 Inspections
 - 3.7 Reporting
 - 3.8 Incident Reporting
 - 3.9 Internal regulations
 - 3.10 EHHS training
 - 3.11 Standards
4. PROTECTION OF THE ENVIRONMENT
 - 4.1 Protection of adjacent areas
 - 4.2 Selection of Borrow Areas, Cuttings and Site Access
 - 4.3 Effluents
 - 4.4 Water Management
 - 4.5 Watercourses
 - 4.6 Air Emissions and Dust

4.7 Noise and vibration

4.8 Waste Management

4.9 Vegetation clearing

4.10 Erosion and Sedimentation

4.11 Reclamation

4.12 Documentation of Site Conditions

5. OCCUPATIONAL HEALTH AND SAFETY (OHS)

5.1 Safety and health plan

5.2 Weekly and daily meetings

5.3 Equipment and operating standards

5.4 Work permits

5.5 Equipment and personal protection

5.6 Hazardous materials

5.7 Emergency Planning

5.8 Fitness for Work

5.9 First Aid

5.10 Covid-19 Plan

5.11 First Aid Kits

5.12 Emergency Medical Evacuation

5.13 Access to care

5.14 Medical follow-up

5.16 Hygiene

5.17 Sexually Transmitted Diseases and Infections

5.18 Substance abuse

5.19 SEA/SH Prevention and Response Action Plan

6. LOCAL WORKFORCE AND COMMUNITY RELATIONS

6.1 Local recruitment including transparency in recruiting, opportunities for men and women, prohibition against child labor/forced labor

6.4 Damage to persons and property

6.5 Land occupation or acquisition

6.6 Circulation and Management of Rolling Stock

7. ADDITIONAL AND SPECIFIC MEASURES

- 7.1 Safety in risk areas
- 7.2. Grievance Mechanism and processes for workers, including SEA/SH cases
- 7.3 Relations with the communities along the river
- 7.4 Complaint resolution mechanism
- 7.5 Gender
- 7.6 Procedure in case of accidental discovery of remains
- 7.7 Internal audits

ANNEX 7 Chance Find Procedures

1. Discovery of cultural heritage

These provisions will be communicated to all workers at the beginning of the project (onboarding, security) and to new stakeholders. They will also be the subject of minutes (quarter-hour) safety on all our sites. The contractor/subcontractor or the Environment Field Manager makes the declaration. It is brought to the attention of the Project Owner, the Village Chief, the local authority, and the National Centre for Arts and Culture (NCAC).

2. Chance Find Management Procedure

- ***Suspension of work:*** when monuments, ruins, substructions, mosaics, elements of ancient canalization, remains of dwelling or ancient burial, inscriptions or generally objects that may be of interest to paleontology, prehistory, history, art, archaeology or numismatics, are updated as a result of work.
- The Contractor will immediately interrupt the work, notify the owner's engineer, which must immediately the administrative authority of the place of discovery that notifies the NCAC immediately.
- ***Delimitation of the discovery site:*** The Entrepreneur will be required to delimit and secure a perimeter of fifty (50) meters around the discovered property. It will limit access to this perimeter, and work can only resume in this perimeter after authorization from the NCAC.
- ***Securing the site to avoid any damage or loss of removable objects:*** In case of discovery of removable antiques or sensitive remains, a night guard will be present until the responsible local authorities and the Ministry of Culture take over.

3. Chance finds report

Within 24 hours of a chance discovery, the Contractor will draw up a report providing the following information:

- The names and contact details of the declarant
- The place and cadastral references
- The date and place of the discovery
- The nature and circumstances of the discovery
- Description and state of conservation of the remains
- Location of the discovery (Geographical coordinates of the site)
- Temporary protection measures put in place.

Once the discovery has been made, and the conservation and protection measures have been implemented, the Site Manager or the Environment, Health and Safety Manager is required to immediately declare the finding to the authorities concerned.

Internally (construction site), the find will be recorded in the site register and communicated verbally to the site engineer. Externally, a written report will be sent via the owner's engineer and the Project Owner, to the Governor and the Ministry of Tourism and Culture, the National Council of Arts and Culture, and the Village Chief. A copy of this report will be stored in the ESMP Works binder.

4. Arrival of cultural services and measures taken:

The NCAC will send a representative to the place of discovery within 2 days of notification and determine the measures to be taken which must be taken within seven (7) days, including:

- Removal of cultural heritage deemed important and continuation of work on the site of the discovery, Continuation of work within a specified radius around the discovery site
- Enlargement or reduction of the area delimited by the contractor; Etc.

If necessary, the PCU will support the NCAC's agents to ensure they arrive on time at the place of discovery. They will carry out a preliminary evaluation with the support of relevant professionals (within 72 hours). The significance and importance of the results must be assessed according to the various criteria relevant to cultural heritage; these include aesthetics, historical, scientific or research, social and economic values.

Decisions on how to manage the finding of discoveries must be made by the responsible authorities of the Ministry of Tourism and Culture (MoTC). This could include conservation, preservation, restoration, or recovery.

The implementation of the decision concerning the management of the finding of discoveries must be communicated in writing by the MoTC.

If the NCAC does not send a representative within 2 days, the owner's engineer may extend this period for an additional 2 days.

Under no circumstances should the PCU take a decision without receiving written advice from the NCAC. The additional work will be charged to the contract but the contractor will not be able to claim compensation for the period of suspension of the work.

Component 1

Summary of concerns from Regional Authorities and Teachers

- A concerned participant stress on the need to revise the curriculum for the National language as it has different dialects and sometimes children are confused in reading the words.
- Teachers find it very difficult to teach the language because they do not have enough training. The training only takes 3 days and that is not sufficient to get what one requires indicated by most teachers.
- The period for training need to be increased so that people will have more knowledge on the subject matter.
- In addition, teachers need to be trained adequately on the Multigrade Curriculum so as to avoid lack of teachers in such schools.
- I am a grade 5 teacher, but to me jolly phonic reflect more on the children literacy reading than the literacy lessons than the National language.
- Monitoring is very crucial for both the National language and the Second Chance Education because it will help to identify the impact it have in the system
- Effective intervention is very good as you can gauge the difference between pupils who got the opportunity and those who did not enroll in it.
 - However, the only problem is the space, for example if the pupil is attending the intervention class in another venue in the morning, because of lack of space in the school, most pupils might not attend the formal class in the afternoon for that particular day. This is a concern from most people consulted in relation to the Effective Intervention during the consultation Visit.
- Limited involvement of Regional directors and officers during project implementation, specifically during trainings because they know what needs are most applicable for the region and the strategies needed for developing teachers' modules in respective areas. Almost all PAPs consulted alluded to the above statement.
- There is a need to re-strategize the teaching process of literacy and numeracy.
- Inadequate materials/resources including textbooks need to be available for the different activities, especially for the National language which is not familiar to people.
- Data flexibility through synchronization is really required across all stakeholders
- The second chance Program implementation should be reviewed entirely to improve efficiency.
- Ready-made or Skeletal scheme and lesson plans should be re-introduced into the school system to ensure consistency in the material delivered to the pupils.
- Overloading of teachers in schools, which do double shifts (Morning and afternoon) in Basic Cycle Schools. By the time it is afternoon, the teacher's energy will not be the same; so, the students will not get the same content as those taught in the morning.
- Inability to achieve proposed contact hours by the Ministry.

- Insufficient subvention to some schools because of enrollment figures not updated at the MoBSE Planning Unit.
- For the enrolment boosting program in Region 5, transportation cost of groceries not included in the funds allocated.
- Lack of curriculum guide in the Present curriculum makes monitoring of teaching difficult.

Component 2 & 3

Concerns from Regional Authorities and Center Managers/Lecturers

- It is difficult for the Authorities from the office to do their own analysis and get the correct data without involving the local authorities, according to a regional governor.
- Involvement of youths in the project activities is very important, as it will help them to engage in something meaningful in their life.
- If such intervention is coming to our district, I think it is crucial for us to know about it so that we can collaborate with the Chief and the Alkalos to select the target beneficiaries indicated by a chairperson in one of the communities.
- If we want our projects to benefit the local communities and they are sustainable, we must follow protocols and due process. Involvement of the local authorities from the planning state will help implementers to work effectively during the life span of the project.
- Some stakeholders were not trained on the project during the preparation phase.
- Regional Governors have little knowledge of what the project is all about, so this makes it difficult for the local authorities to be part of the implementation of the project.
- There is a tendency of having social issues at the communities surrounding the Agribusiness center as people from different villages will converge at the center to study and there is a risk of interfering with community culture and bad influence on the youths like GBV, sexual violence, smoking marijuana, drinking alcohol etc.
- Most students in rural skills centers cannot afford to pay for course fees due to poverty and as such, the center is struggling with operational costs including sustaining of trainers.
- There is a worry on how free and fair the awarding of grants will be as it will be competitive.
- Participants indicated that about 85% of youths, especially in the rural areas, have the mentality that government should be responsible to sponsor their education about acquiring skills.
 - There is a general concern as to how students will be selected for the start-up window because if few students benefit from that window, the rest will still go back jobless in the streets .
- Some youths expressed concerns related to lack of access to learning skills they are interested in. These skills (hairdressing, catering (hospitality) etc.) are not available in Basse unless they

travel to the urban areas where they do not know anybody who can host them for the duration of their studies.

- Challenges concerning transportation costs to attend the Julangel skills center which is far from the northern end of the region where they live.
- Most people with disability (youths) want to undergo training at the Julangel skills center but due to lack of accessible accommodation facilities in the area, they are discouraged to enroll.

Summary of concerns from Youths and Women

The youth and women groups consulted identified the following important issues:

- The community members and the stakeholders emphasized their full support for this project's realization.
- They all said, we are eagerly waiting for it and want to stand with them to support it.
- We have some who started to benefit from it but the way selections is done is not fair, who can see families who are extremely poor, yet still they do not benefit. At the same time some well off families are benefiting from the Nafa project and this is what doubted me, according to a woman from a surrounding community.
- A woman (widow) stated that she is very poor but she is not benefiting and most of the extremely poor household are not benefiting, she concluded.
- Some regional authorities indicated that they are not included, I think in order to get what we want from projects, we need to change strategies raised by a concerned participant.
 - The involvement of VDC members, relevant authorities, and village Alkalos would help in the selection. I think these people will work with the chief to select the correct beneficiaries, he concluded.
- My husband is visually impaired and we are very poor, but we are not included, this is why I came from another village to attend the meeting when the chief called me. Our chief is very helpful, sometimes he give us money from other people who normally give to our charity through him.
 - Therefore, the chief and the mothers' club members need to be involved because they know the people who need the money most.
- Engaging our children in skills training is good, but the problem is most of our young people are without job. I think the government need to consider and create jobs for young people indicated by a woman who attended the meeting.
- Family conflict resulting from decisions as to how the Nafa cash transfer should be used, especially in polygamous households where the husband has passed away during project implementation.
- Potential conflict between some community leadership and recipients of the cash transfer due to lack of familiarization between the Alkalo and officers making visitation to distribute the monies.
- There is a tendency of favoritism being evident in the selection of people for the start-up grant due to experience with similar projects.

- There might be challenges for vulnerable people to attend trainings or register for local businesses at local council office as mobility might be an issue for people with disability due to lack of access to certain buildings or even wheelchair.
 - In addition, some government officers might not have the patience to accommodate their needs during activities.
- Tendency to not receive some grievances.
- Some women might be slow to catch up during the training as not everybody is on the same level of understanding.
- Lack of dedication from the part of the beneficiaries of the PEI program.
- Lack of childcare might be a challenge faced by women and youths who need to attend training under the PEI Program.
- There is fear of insufficient sensitization or advertisement of the PEI program to the population in the rural areas as most of the women are always busy with house chores and are not even aware of what is happening in their regions.
- Lack of adequate start-up funds for the PEI program might lead to sustainability challenges.
- There are concerns on how poor households are selected as there are districts which have extremely poor households than ones selected for the current program especially in URR.
- There is concern of the women being asked to return the start-up grant or even with interest based on experiences.
- Previously, a project was launched in the region proposing help for youths in acquiring skills and setting up businesses.
 - They later came back asking for refund of the grants used to set up the businesses for those who were awarded grants. This led to a police incident where it was agreed that they should be left alone as refund of the capital invested was not part of the initial agreement.

GAMBIA RISE STAKEHOLDERS' CONSULTATION MEETING

FRIDAY 26TH MAY, 2023

ATTENDANCE REGISTER

No.	Name	Designation	Institution/Unit	Telephone	Email	Signature
1.	Jenifer B. Sagnia	National Consultant	Effective Intervention	3657581	jsagnia@gmail.com	
2.	Faten Bin Tobe	CEO	Effective Intervention	3994067	fatetobe@gmail.com	
3.	Abhishek Thakur	HR Officer	Effective Intervention	2549782	a-thakur@effective-intervention.org	
4.	Pierre M. Conna	EDO	NED1	9906299	pconna@ned1.org	
5.	Babucarr N. Jof	Planning Director	NANA	3194018	bjofof@nana.org	
6.	Solun Fuan-chun	Director	PRASO NASS	3917977	Solun.fuan@praso-nass.org	
7.	Mouadlou Jeng	Director	CIREM	97732874	jaeng503@gmail.com	
8.	Anthony G. Mandy	DIHE	RELHRESI	2745166	mandy.tony@relhresi.org	
9.	Alhaji Karam	SC	PCF	3305448	alhamet@pcf.org	
10.	Samba Sow	D, STI	MRD	816794	bsow86@gmail.com	
11.	Mamuna A.M. Sall	SSS	MORSE (PCF)	3039676	m.sall@pcf.org	
12.	Hannah LM Njie	ESS	MORSE (PCF)	2742882	hannah@pcf.org	
13.	Abdoulaye Sow	PM	PCU	996687	psow@pcf.org	

ANNEX 10: Grievance Logbook For Non-SEA/SH Complaints

Case no.	Date Claim Received	Name of Person Receiving Complaint	Where /how the complaint was received	Name & contact details of complainant (if known)	Content of the claim (include all grievances, suggestions, inquiries)	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication and by whom)	Expected Decision Date	Decision Outcome (Include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when and via what method of communication and if follow up action is required.