



Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/17/2019 | Report No: ESRSA00157



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Ghana	AFRICA	P165557	
Project Name	Ghana Accountability for Learning Outcomes Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	5/20/2019	7/30/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministry of Education		

Proposed Development Objective(s)

To improve the quality of low performing basic education schools and strengthen education sector equity and accountability in Ghana.

Financing (in USD Million)	Amount
Total Project Cost	559.40

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

No

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

The GALOP focuses on improving learning in basic education by strengthening teacher capacity, school support and resourcing, and accountability systems for improved decision-making. While system interventions (particularly for accountability) will be national in scope to ensure full harmonization of the system, learning interventions will target schools with the greatest challenges in terms of learning outcomes and resources. Using a results based financing approach, the two results areas- Learning and Accountability- are mutually reinforcing as Ghana aims to improve learning outcomes. The proposed design aims to build capacity in key institutions, strengthen the systems for teaching and learning and support the system integration of digital monitoring and data collection at all levels.



D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social] The project activities will target selected underperforming (low-resourced) schools across the country in both rural and urban areas . About half the public basic schools will be selected to benefit under the project based on the resources available. The criteria for selection will be informed by the planned performance ranking of all schools based on four indicators including performance in the BECE, percentage of trained teachers, average class size and district level poverty measure . However, at this stage of preparation, the specific project locations have not yet been identified. All sub-projects will be guided by the requirement of the ESF and Environmental and Social Standards of the World Bank. This approach will allow for the screening of selected schools further down during implementation where details of the Sub-Project Environmental and Social screening will provide some details on potential risks with the required mitigation measures.

D. 2. Borrower’s Institutional Capacity

The Ministry of Education (MOE) and the Ghana Education Service (GES), are the main institutions responsible for leading implementation of this project. The MOE will manage the implementation of all Components working with GES, NaCCA, NTC and NIB to deliver on annual work plans. Although both MOE and GES have implemented a results-based financing project under the Ghana Secondary School Improvement Project (SEIP) and have recruited two (2) safeguards officers (consultants) to support and coordinate safeguards activities at various levels, the legal and institutional structures of these two institutions do not generally have the capacity to implement the Environmental Social Framework (ESF). An institutional capacity assessment of the PIU was carried out during preparation and it was identified that, the scale of work under GALOP was minimal and the 2 safeguards consultant was adequate to support E&S management. However, recommendation was made to include focal persons from the MOE Special Education Unit to support implementation of the other social aspects including disability inclusion and Gender Based Violence (GBV) prevention. Training for the safeguards officers on the new ESF is recommended and included in the ESCP.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The Environmental Risk Rating is classified as moderate. The classification has considered the potential environmental risk at this stage. Learning grants awarded to schools could potentially include some minor construction, renovation and refurbishment works. Key environmental issues will be moderate and relate to noise, dust and general health and safety of workers, students, teaching staff. These risks will be site specific, limited to existing school compounds and can easily be managed through the implementation of cost-effective mitigation measures.

Social Risk Rating

Moderate

The social risk rating is also classified as Moderate. Project interventions are expected to be limited to existing school compounds. However, if pursued, activities such as construction of walkways, fence wall etc. will require some degree of due diligence to mitigate against potential issues of boundary dispute or impact on livelihoods. The project activities will be undertaken within schools and the risk of GBV is highlighted for preventive measures consistent with the GBV good practice note for infrastructural development. The project has also considered several opportunities within the project scope to address school related GBV and disability inclusion.

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



B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The Bank's review considered the anticipated environmental and social risk presented by the project, the E&S management requirements and the Project's capacity to manage its environmental, social, safety and health risk in compliance with ESS1. The project under the learning grants could potentially fund some renovation and construction works. These activities however are expected to be to minor renovations including repairs of school building, refurbishment of ICT and science laboratories, construction of walkways, fence wall/main gate etc. No major constructions are envisaged. Key environmental and social issues will be related to noise, dust and general health and safety of workers, students and teaching staff. Some degree of due diligence is also required to mitigate against potential issues of land boundary dispute or impact on livelihoods. These impacts are not envisaged to be significant or irreversible. They are expected to be site specific, limited to existing school compounds, and can be managed through the implementation of cost-effective mitigation measures. The specific schools/ locations that these works will take place are undetermined at this stage. An ESMF and RPF have therefore been prepared and consulted upon. The Environmental and Social Commitment Plan (ESCP) has outlined the client's commitments to screen all sub-projects further during implementation and prepare associated Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMPs), Resettlement Action Plan (RAP), Abbreviated Resettlement Action Plan (ARAP) or Livelihood Restoration Plan as may be required. The screening criteria have been included in the Environmental and Social Management Framework.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is key to the success and sustainability of the project development objectives. In consultation with the Bank team, MOE and GES, a draft SEP has been prepared. The SEP outlines the key stakeholders and the approaches that will be used to consult with them including consideration for needs of vulnerable and disadvantaged groups (teachers, pupil/ students with disabilities etc) to ensure their participation. It contains a summary of the consultations held during preparation and a comprehensive list of the direct stakeholder and stakeholders with other interests. The SEP includes comprehensive M&E arrangement to monitor the SEP implementation and update any major changes during implementation. Major revisions to the SEP will be publicly disclosed. The project design incorporates a comprehensive project-wide GRM which will enable a broad range of stakeholders to channel concerns, questions, and complaints to the various implementation agencies. The project will harness the existing system established under the on-going Ghana Secondary Education Improvement Project. The client will seek stakeholder feedback through Citizens Engagement surveys and there are discussions with the umbrella group for NGOs engaged in education, the Ghana National Education Campaign Coalition (GNECC) to track citizen engagement and impact of the GALOP. The project will disclose all safeguards documents (ESMF, RPF, ESCP and SEP) as required prior to appraisal.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions



The project footprint is envisaged to be relatively small and short term. No workers camp will be established. Both skilled and unskilled laborers are expected to be sourced from local and surrounding communities. The potential for labor issues is minor. The project ESIA's will determine whether a specific labor management plan is required. In the case of significant impacts, a Labor Management Procedures (LMP) will be developed by the contractor and submitted to the Project Implementation Unit for review and the World Bank for clearance before implementation. With Low risk, the LMP will be included in contractor ESMP to ensure the health and safety of workers. The Occupational Health and Safety measures will take into account the general Environmental Health and Safety Guidelines (EHS). Because projects will be undertaken in existing schools the project will take measures for GBV prevention such as including in Civil works contracts Codes of Conduct that include measures to prevent GBV/SEA, identifying non-governmental organizations/ GBV service providers for GBV related complaints uptake, case management and referrals etc. The ESCP documents commitment to ensure adequate budgeting for financing GBV action plans.

ESS3 Resource Efficiency and Pollution Prevention and Management

The overall level of environmental risks associated with the project is moderate. However, the following specific aspects in relation to ESS3 will be considered. Dust and Noise: During renovations, dust and noise emissions might likely generate from carpentry works and chiseling of walls. The relatively short-term and small-scale nature of the works suggest that noise and dust levels will not be excessive or cause long-term nuisances. The construction works will however be scheduled to take place during school vacations or off school hours to limit the impact on the children and other persons in the schools. Waste management: Construction activities will generate solid waste which will primarily include concrete debris from chiseling, metal, wood and glass pieces etc. The waste generated by the construction works will be segregated according to type, stored in appropriately labeled containers and largely disposed of at approved sites according to the provisions in the ESMF.

ESS4 Community Health and Safety

The project's civil works will include potentially minor repairs and renovations which will mainly be undertaken within school compounds. The ESMF has identified potential Community Health and Safety risks of the project including sexual harassment, child labor, discrimination against vulnerable groups and occupational health and safety issues for workers. The ESMF includes a screening tool that will help in identifying risks for subprojects. As part of ESMPs, the Project will evaluate site specific Community Health risks and impacts of the Affected Communities during the project life-cycle and will establish preventive and control measures. The project will document site specific emergency preparedness and response activities, resources, and responsibilities as part of the ESMPs and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will support learning grants. Since utilization of grants is flexible at the school level, they could potentially fund some renovations including the construction of walkways, fence walls, repairs of school building etc. These activities are expected to be limited to existing school compounds. However, some due diligence is required to mitigate against potential issues of boundary dispute or impact on livelihoods. ESS 5 is applied to provide appropriate mitigation measures. Since the schools or location where works will take place is unknown, the project has prepared



a Resettlement Policy Framework (RPF) to guide the preparation of Resettlement Actions Plans during implementation if required.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Project activities will take place within existing school compounds and will not be within critical habitats, sensitive areas, habitats or spawning ground for any threatened, rare or endangered species. Therefore there will be no impact on living natural resources. Hence, potential environmental risks and impacts associated with this ESS will be limited.

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

This ESS is not relevant in the project area. There are no Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities in the project area of influence.

ESS8 Cultural Heritage

Project activities will take place within existing school compounds and does not envisage any impacts on physical, cultural, and/or archeological sites. However, the project will take cognizance of tangible and intangible cultural heritage sites and items, including potential archaeological heritage within the project’s area of influence. The Project will adopt measures such as undertaking meaningful consultations with stakeholders regarding cultural heritage and implementing basic mitigation measures. In the event of finding features of cultural value during project implementation, ‘Chance Find’ standard procedures developed under the ESMF would be followed.

ESS9 Financial Intermediaries

This standard is currently not relevant as there will not be financial intermediaries involved.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

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

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
ESMF and RPF have been prepared. The project will screen subproject activities using the screening tool developed under the ESMF and make recommendations on specific assessments to be conducted. The	06/2020

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project will develop and implement specific Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) as required when sub-project locations are known.	
ESS 10 Stakeholder Engagement and Information Disclosure	
The project has prepared a Stakeholder Engagement Plan . Project Implementation team to provide oversight over the SEP implementation.	05/2019
ESS 2 Labor and Working Conditions	
The project ESIA will determine if standalone LMP is required in the case of significant impacts or labor related clauses will be included in contractor ESMP. The contractor will develop the LMP as appropriate for review by PIT and WB.	06/2019
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Contractor ESMPs will include waste management plans. Waste minimization techniques will be ensured by the project.	06/2020
ESS 4 Community Health and Safety	
Covered under the ESMF and will be further detailed under the ESMP. Considerations include traffic and safety of school children and pupils, teachers and worker as well as GBV prevention.	06/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
The Project has prepared Resettlement Policy Framework (RPF). RAP/ ARAP/ LRP will be prepared as required when subproject locations are identified.	06/2020
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
The project will screen subproject activities using the screening tool developed under the ESMF to determine potential biodiversity risks and impacts and make recommendations on specific assessments to be conducted.	06/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Not relevant	
ESS 8 Cultural Heritage	
Project and contractors to follow Chance find procedure described in the ESMF.	06/2019
ESS 9 Financial Intermediaries	
Not relevant	

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



Is this project being prepared for use of Borrower Framework?

No

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

Project will not rely on Borrower's E&S

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Ministry of Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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