

**NIGERIA HUMAN CAPITAL OPPORTUNITES FOR PROSPERITY
AND EQUALITY PROGRAM-FOR-RESULTS (HOPE-PforR)**

PROGRAM-FOR-RESULTS FINANCING

P181476

**ENVIRONMENT AND SOCIAL SYSTEMS ASSESSMENT
(ESSA)**

Draft Final

August 6, 2024

Prepared by the World Bank

TABLE OF CONTENTS

TABLE OF CONTENTS	I
LIST OF ACRONYMS	III
EXECUTIVE SUMMARY	V
SECTION I: PROGRAM DESCRIPTION AND SCOPE	1
1.1 INTRODUCTION	1
1.2 PROGRAM DESCRIPTION.....	2
1.3 PROGRAM IMPLEMENTATION AND INSTITUTIONAL ARRANGEMENTS	3
1.4 PROGRAM BOUNDARIES AND ACTIVITIES.....	4
1.5 EXCLUDED ACTIVITIES	6
1.6 SCOPE OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM ASSESSMENT (ESSA)	7
1.7 OBJECTIVES OF THIS ESSA.....	9
1.8 APPROACH OF ESSA	9
SECTION II: STAKEHOLDER CONSULTATION	11
SECTION III: DESCRIPTION OF EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL IMPACTS	16
3.1 OVERVIEW OF PROGRAM RISKS AND BENEFITS	16
3.2 EXPECTED ENVIRONMENTAL BENEFITS	16
3.4 EXPECTED SOCIAL BENEFITS.....	17
3.5 SOCIAL RISKS AND IMPACT	18
SECTION IV: OVERVIEW OF RELEVANT BORROWERS ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS	19
4.5 NIGERIA’S INSTITUTIONAL FRAMEWORK.....	24
4.5.1 FEDERAL MINISTRIES RELEVANT TO HOPE PROGRAM	24
4.5.2 STATE MINISTRIES RELEVANT TO HOPE PROGRAM	25
SECTION V: ASSESSMENT OF THE CLIENT’S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS .	26
5.1: SUMMARY OF SYSTEMS ASSESSMENT	27
CORE PRINCIPLE 1: GENERAL PRINCIPLE OF ENVIRONMENTAL AND SOCIAL MANAGEMENT	27
CORE PRINCIPLE 2: NATURAL HABITATS AND PHYSICAL CULTURAL RESOURCES	29
CORE PRINCIPLE 4: LAND ACQUISITION	32
SECTION VI: PROGRAM ACTION PLAN (PAP) AND RECOMMENDATIONS	37

6.1 ENVIRONMENTAL SUMMARY AND RECOMMENDATIONS.....37
6.2 SOCIAL SUMMARY AND RECOMMENDATIONS37

SECTION VII. SUPPORTING ANNEXES AND REFERENCE DOCUMENTS40

**ANNEX 1: APPLICABILITY OF CORE ENVIRONMENTAL AND SOCIAL PRINCIPLES (CP) TO THE HOPE PROGRAM RESULT
AREA AND DISBURSEMENT LINKED INDICATORS (DLIs)40**
ANNEX 2: KEY ENVIRONMENTAL & SOCIAL RISKS AND BENEFITS ASSOCIATED WITH PROGRAM ACTIVITIES43
ANNEX 3: DISCUSSION QUESTIONS AND RESPONSES FROM REPRESENTATIVES OF STATES IN SOUTHERN NIGERIA48
ANNEX 4: DISCUSSION QUESTIONS AND RESPONSES FROM REPRESENTATIVES OF STATES IN NORTHERN NIGERIA.....58
ANNEX 5: LIST OF PARTICIPANTS AT CONSULTATION WITH STATES63
ANNEX 6: LIST OF PARTICIPANTS AT THE PRESENTATION OF THE ESSA FINDINGS65

LIST OF ACRONYMS

BEMONC	Basic Emergency Maternal, Obstetrics, Newborn Care
BHPF	Basic Healthcare Provision Fund
BVN	Biometric Verification Number
CoC	Code of Conduct
CRF	Consolidated Revenue Fund
CRF	Consolidated Revenue Fund
DLI	Disbursement-Linked Indicators
E&S	Environment and Social
ENB	Environment, Natural Resources and Blue Economy
ESSA	Environmental and Social Systems Assessment
FMEnv	Federal Ministry of Environment
FMBEP	Federal Ministry of Finance Budget and Economic Planning
FMoH	Federal Ministry of Health
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GoN	Government of Nigeria
GRM	Grievance Redress Mechanism
HCI	Human Capital Index
HOPE	Human Capital Opportunities for Prosperity and Equality
ICT	Information Communications Technology
IMR	Infant Mortality Rate
IPF	Investment Project Financing
ISR	Implementation Status and Results Report
LGA	Local Government Area
MDA	Ministries, Departments and Agencies
MICS	Multiple Indicator Cluster Survey
MMR	Maternal Mortality Rate
NCD	Non-Communicable Diseases
NEC	National Economic Council
NGF	Nigeria Governor's Forum
NIN	National Identification Number
OoSC	Out-of-School Children
PAP	Program Action Plan
PCU	Program Coordinating Unit
PDO	Program Development Objective
PFM	Public Financial Management
PFM	Public Financial Management
PforR	Program-For-Results
PHC	Primary Health Care
RA	Result Area
SABER	State Action and Business Enabling Reforms
SFTAS	State Fiscal Transparency Accountability and Sustainability
SMEnv	State Ministry of Environment

SMoF	State Ministry of Finance
SMoH	State Ministry of Health
SMoH	State Ministry of Health
SMoLG	State Ministry of Local Government
SUBEB	State Universal Basic Education Board
TA	Technical Assistance
U5MR	Under-five Mortality Rate
UBE	Universal Basic Education
UBEC	Universal Basic Education Commission
UNH	Universal Health Coverage

EXECUTIVE SUMMARY

1. To facilitate education and health efforts in Nigeria, the World Bank is proposing to support the Government of Nigeria (GoN) with a Program for Results (PforR) instrument referred to as the Nigeria Human Capital Opportunities for Prosperity and Equality-Governance Program-For-Results (HOPE-Gov-PforR) (hereafter, the Program). The program development objective is to support the Federal Republic of Nigeria in strengthening financial and human resource management in basic education and primary health care sectors.

The operation will be a hybrid one with both PforR and Investment Project Financing (IPF) component. The total operation cost to be financed by the World Bank is US\$500 million, which will cover twenty-five percent of the government's program. The IPF component will be \$20 million to support targeted technical assistance to the federal and states MDAs to support achievement of the disbursement linked indicators (DLIs).

2. The implementation of the PforR Component will leverage on the existing systems withing the relevant Ministries Departments and Agencies (MDAs). **A National Program Coordination Unit (NPCU) will be hosted as a Special Secretariat within the Federal Ministry of Budget and Economic Planning (FMBEP).** It will work in collaboration with the following Institutions – (i) Federal Ministry of Health and Social Welfare, its federal MDAs and counterparts at the state level; (ii) Federal Ministry of Education, its federal MDAs and counterparts at the state level; (iii) Federal Ministry of Finance, and its counterparts at the state level, (iv) State Ministries of Budget and Economic Planning; (v) The Federal Universal Basic Education Commission and Universal Basic Education Boards at the state level; (vi) The Ministerial Oversight Committee (MOC) of the Basic Health Care Provision Fund (BHCPF) and all gateways and institutions participating in the BHCPF. The NPCU will be headed by a National Program Coordinator (NPC), who shall, through the Permanent Secretary, FMBEP, report to the Program Steering committee, which will be chaired by the Hon. Minister of Budget and Economic Planning. States will mostly be responsible for achieving the Program's results and thus will be leading the implementation of the PforR component, with a few results to be achieved at the federal level. To support the implementation of the Program in each State, a State Technical Committee will be established in each of the participating States. The membership of the committee will include representation from the key MDAs responsible for achieving the DLIs: Ministries of Finance, Budget and Economic Planning, Education, Health, and Office of the State Accountant Generals. The State Ministries of Budget and Economic Planning will be the state program coordination anchors, and the Commissioners will chair the States' Steering Committees.
3. The PforR will support the Government program's action plan, reorganized into three result areas and six disbursement-linked indicators (DLIs):
 - i. **Result Area 1: Increased availability and effectiveness of financing for basic education and primary health care service delivery.** This results area focuses on

the following areas: (i) Securing and increasing funding for health and education at the federal and state level; (ii) Establishment of a need-based and performance-based system for allocating UBE and BHCPF resources across and within states, and (iii) Strengthening credibility and predictability of federal and state funding for basic education and primary health care.

- ii. **Result Area 2: Enhance transparency and accountability for basic education and primary health care financing.** This results area will incentivize (i) timely and consistent publication of budget and budget implementation/execution, to enable budget management; (ii) Improving the procurement process for transparency and value for money. These actions will help identify deviations from the planned budget and allow for timely corrective actions where possible.
- iii. **Result Area 3: Improve recruitment, deployment, and management of teachers and primary health workers.** This results area will incentivize (i) the enhancement of the sector and workforce planning function, (ii) reduction of significant staffing gaps and improve the deployment and management practices for basic education and primary health care workers, and (iii) adoption of new or existing systems such as the Central Bank of Nigeria Bank Verification (BVN) and National Identity Numbers platforms to check payroll fraud, biometric check-ins where available, community monitoring, performance bonuses, automatic payroll deductions.

4. The list of DLIs for the three result areas are as follows:

DLI1- Enhanced access and equity of UBEC financing of basic education.

DLI2- Strengthened state budget planning and execution for basic education and primary health care.

DLI3- Strengthened accountability and transparency of funding for basic education and primary health care.

DLI4- Strengthened accountability of funding for basic education and primary health

DLI5- Increased number of teachers and primary health workers deployed

DLI6- Improved payroll and performance management for teachers and health workers.

5. The Program will exclude activities that do not meet the World Bank's Policy on eligibility for PforR financing (September 2020). The borrower shall ensure that the Program excludes any activity which, in the opinion of the World Bank, is likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and humans and/or requires significant civil works, land acquisition, displacement and or resettlement of affected people. Given that the HOPE-PforR Program is an institutional reform program, it will not support investments with high environmental and social risks and impacts, such as construction and infrastructure development. It will not accommodate involuntary displacements and resettlements. Thus, any Program activity that entails land acquisition, negative impact on natural habitat and cultural resources, public and workers' health and safety will not be funded under the PforR.

6. The Environmental and Social Systems Assessment (ESSA) examines the extent to which the Federal and State Government's existing environmental and social management systems operate within, an adequate legal and regulatory framework to guide environmental and social impact assessments, mitigation, management and monitoring at the PforR Program level. It assesses their consistency with the six 'core principles' of Program for Results Policy and recommends actions to address the gaps and to enhance performance during Program implementation. This ESSA incorporates recognized elements of good practice in environmental and social assessment and management and thereafter defines measures to strengthen the system and recommends measures that will be integrated into the overall Program. The ESSA is undertaken to ensure consistency with six core principles and key planning elements of PforR ESSA.
7. The World Bank team prepared the ESSA through a combination of detailed reviews of existing program materials and available technical literature, including policies, regulations, guidelines and examples of due diligence and design documents, interviews and extensive consultations with government staff, non-governmental organizations, regulatory agencies, private sector organizations and sector experts associated with public revenue generation.
8. In line with the six core principles above, the relevant risks associated with the HOPE Program and within the proposed Result Areas (RAs) under the PforR covers environmental and social issues and include:
 - a) Potential increase in generation of healthcare wastes due to the expansion in the number and optimization of Public Primary Healthcare Facilities.
 - b) Potential discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of women in recruitment, deployment, and performance management of teachers and primary health workers.
 - c) Release of annual statutory allocations for UBEC and BHCPF and enhanced efficiency and equity of UBEC financing of basic education which will increase state discretion on the use of funds for state priority needs could result in investments in the rehabilitation/refurbishment of schools, which could lead to negative environmental and social impacts associated with rehabilitation, for example, generation of solid waste, noise and air pollution.
 - d) Rehabilitation work can also impact workers' health and safety.
9. The overall environmental and social risks have been assessed and deemed to be **Moderate**. Although the Program does not involve construction works and program activities are not likely to require significant changes to the borrower's overall environmental systems, the program was generally assessed as moderate because there could be rehabilitation works due to increased funding for non-salary items for PHC and basic education and also the envisaged social risks associated with recruitment and deployment and biometric check-ins of teachers and health workers in Result Area 3 (specifically DLI5 and DLI6).

10. The ESSA process includes stakeholder consultations and disclosure of the ESSA Report, in accordance with the World Bank Policy and Directive for Program for-Results Financing and Access to Information Policy. At present, the ESSA consultation process is embedded in the Program consultation process.
11. Some analysis was carried out to determine the range of environmental and social risks and benefits that are associated with the PforR program based on each of the DLIs. The PforR component of HOPE will generate some E&S risks and benefits.
12. The PforR component of HOPE-Gov will generate some E&S benefits and risks. The environmental risks include possible rehabilitation of infrastructure, which would pose some environmental risks. On the other hand, the environmental benefits are minimal and limited to the benefits from reduced paper use, especially e-procurement, which will lead to reduced use of paper and hence conservation of forests as trees from forests are used in paper production and energy efficiency and climate sensitivity for construction and rehabilitation. The detailed range of key environmental and social risks and benefits associated with specific DLI in HOPE-Gov PforR is presented in Annex 2.
13. The HOPE-Gov PforR has some activities that are expected to impact the environment. Rehabilitation activities could be conducted under the PforR due to activities to enhance efficiency and equity of UBEC financing of basic education (DLI1) and activities under DLI 2 (Strengthened state budget planning and execution for basic education and primary health care). Thus, environmental risks associated with rehabilitation, such as solid waste, noise and air pollution, will impact the environment.
14. The PforR program will deliver minimal direct and indirect environmental benefits. Environment benefits will accrue through DLI2 as the guidelines for preparation of realistic, costed annual budget submissions for the two sub-sectors will also cover energy efficiency and climate sensitivity for construction and rehabilitation and deliver climate co-benefits. Also, direct environmental benefits will accrue from achieving DLI 6, which involves e-procurement system. Given e-procurement, papers would no longer be used, thus saving forests/trees used to manufacture papers.
15. The HOPE PforR has many social benefits that will result from achieving the DLIs. These benefits include enhanced health outcomes, enhanced literacy and numeracy among school children, reduced infant and maternal mortality rates, increased life expectancy, reduced number of out-of-school children (OOSC), enhanced performance of pupils and students in basic education, enhanced economic development, and poverty reduction, especially among the most vulnerable.
16. Enhanced efficiency and equity of UBEC financing of basic education (DLI1) and strengthened state budget planning and execution for basic education and primary health

care (DLI2) will facilitate the procurement of materials and equipment needed to enhance teaching and learning in basic education and equipment needed to enhance primary health care and thus better education and health outcomes. Evidence shows that increased per-pupil spending led to higher graduate rates, higher adult wages, and reduced likelihood of adult poverty with more impact on students from low-income households¹. Also, stable, predictable, and increased funding may be applied for rehabilitation, leading to increased employment for the locals who may be engaged in menial jobs. Besides, the rehabilitation may lead to an influx of workers into the communities, thus enhancing the local economy.

17. The HOPE-Gov PforR is also associated with some social risks. Enhanced efficiency and equity of UBEC financing of basic education (DLI1) and strengthened state budget planning and execution for basic education and primary health care (DLI2) could potentially impact workers' health and safety for workers involved in rehabilitation works that may be associated with these DLIs. The workers may be exposed to pollution caused by dust and noise at the work site. There could also be an influx of workers to the communities where rehabilitation work will occur. This may affect the communities as there could be cases of sexual abuse and other vices, for example, drug abuse.
18. There could be potential discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of women while reducing staffing gap and deployment for basic education teachers and primary health care workers DLI5. In addition, although social conflict as envisaged by ESSA, especially regarding armed conflict, is not applicable, discrimination along the lines of ethnicity and religion in the recruitment of teachers and health workers can result in complaints, social unrest and demonstrations.
19. Following the identification of environmental and social risks, the E&S management system in place to manage the identified risks was assessed. The assessment was done using the following criteria: strengths of the system, or where it functions effectively and efficiently and is consistent with Bank Policy and Directive for Program-for-Results Financing; inconsistencies and gaps between the principles espoused in Bank Policy and Directive for Program-for-Results Financing and capacity constraints; actions to strengthen the existing system. Information from this analysis, identification of gaps and opportunities/actions, was used to inform the recommendations and Program Action Plan (PAP).
20. Given the environmental impact of this project, some recommendations are made as follows:
 - Strengthening the E&S capacity under the project is needed. To facilitate this, E&S specialists should be recruited for the Program.

¹ Institute for Policy Research (2017) Policy Research Brief. <https://www.ipr.northwestern.edu/documents/policy-briefs/school-spending-policy-research-brief-Jackson.pdf>

- There is also a need to develop healthcare waste management strategies to facilitate the management of healthcare waste. The requirements for healthcare waste control should be included in the bidding document under HOPE PforR.
- There is need to build the capacities of implementing entities on the healthcare waste management strategies developed
- There is a need to develop an environmental and social management strategy or manual for schools.
- There is a need to build the capacities of implementing entities on environmental social health and safety (ESHS) in schools.

21. Given the identified social issues and weaknesses in the federal system, the following recommendations are made:

- Ensure that the recruitment of teachers and health workers to reduce staffing gap and application of mechanisms to reduce absenteeism are carried out transparently to avoid ethnic or religious bias. Also, there is a need to ensure gender inclusion in the recruitment, deployment and management of teachers and health personnel.
- Ensure a select number of teachers are trained on environmental and management and safety in the school environment.
- Establish a robust grievance redress mechanism specific to the Program to ensure that complaints from different stakeholders are well addressed.
- Strengthen provisions in the Code of Conduct (CoC) on gender-based violence (GBV) prevention and response, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment.
- Promote inclusive practices to accommodate students with disabilities through teacher training and inclusion in the upgrade CoC.

22. Following the recommendations, the breakdown of actions to be included in the Program Action Plan (PAP) with indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions are detailed in the Table ES1.

23. Table ES1: Program Action Plan (PAP)

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
1	Hire qualified Environmental and Social Officers and provide capacity building/system strengthen program to strengthen their skills	No later than 3 months after effectiveness (will be reported during the first mission ISR)	FMFBEP and Program Coordinating Unit (PCU)	Assist the E&S PAP implementation official to execute the above responsibilities.
2	Develop health care waste management strategies for	Within one year of effectiveness or before the first	Federal and state Ministry of Health and relevant agency	Healthcare waste management strategy document.

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
	managing healthcare waste result from the program	bidding document for equipment procurement, whichever is earlier.		
3.	Conduct capacity building training on healthcare waste management	Within one year of effectiveness after the healthcare waste management strategies are developed	FMBEP, Federal and state Ministries of Health, Education, and relevant agency	No. of participants that participate in the training
4	Develop environmental and social management and safety strategy/manual for schools	Within one year of effectiveness or before the first bidding document for equipment procurement, whichever is earlier	Federal and state Ministry of Education and relevant agency	School environmental and social management and safety strategy/manual
5	Conduct capacity building training on environmental social health and safety (ESHS) in schools.	Within one year of effectiveness after the ESHS manual is developed	FMBEP, Federal and state Ministries of Health, Education, and relevant agency	Number of participants that participate in the training
6	Strengthen provisions in the Code of Conduct (CoC) on gender-based violence (GBV) prevention and response, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment.	Within two years of effectiveness	Federal and state Ministry of Education and relevant agency	CoC updated to include provisions on GBV prevention and response
7	Promote inclusive practices to accommodate students with disabilities through teacher training and	Within two years of effectiveness	Federal and state Ministry of Education and relevant agency	CoC updated.

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
	inclusion in the upgrade CoC.			
8	Develop a GRM specific to the Program	Within one year of effectiveness	Federal and state Ministry of Education and Health and relevant agency	Copies of GRM outlining details of implementation

SECTION I: PROGRAM DESCRIPTION AND SCOPE

1.1 Introduction

24. Nigeria's human development outcomes are among the lowest in the world. Nigeria's human capital index (HCI) of 0.36 is the sixth lowest, 168 out of 173 countries. Nigeria's HCI of 0.36 implies that a child born in Nigeria can be expected to achieve only 36 percent of her or his potential productivity. Despite the basic education enrolment increase from 35 million to 40 million between 2018 and 2022, 13 million Nigerian children of 6-14 age group remain out of school (OOS), more than any other country globally. One out of four children in this age group are OOS in Nigeria (MICS, 2021).

25. Regarding health, Nigeria is among the bottom five globally in terms of maternal mortality rate (MMR), infant mortality rate (IMR), under-five mortality rate (U5MR) and life expectancy. Life expectancy of 54 years is the lowest in the world. Under-five mortality is the second highest globally at 114 per 1,000 live births. Maternal mortality is third highest in the world at over 1,000 per 100,000 live births. These numbers translate into over 800,000 deaths annually among children under five, and about 80,000 maternal deaths. Nigeria therefore accounts for 1 out of 6 child deaths globally, and 1 out of 4 maternal deaths. The prevalence of stunting among children under five is 37% – with long-term implications for human development – and ranks among the top 10 in the world. The same is true of the total fertility rate (5.3 births per woman), which has only fallen slightly from its 1990 level of 6.0. While Nigeria is at the early stages of the epidemiological transition, with non-communicable diseases (NCDs) accounting for only 24% of total deaths, the NCD burden poses a new and growing challenge.

26. If Nigerian children were to reach their full potential in education and health, the country's GDP per capita could be 2.8 times higher. Human capital investment will therefore be critical for Nigeria's future development and shared economic prosperity. Half the population is currently less than 18 years old. By 2050, Nigeria is projected to be the world's third most populous country, with about 400 million people, over half under the age of 25. However, the prospect of reaping a demographic dividend due to this favorable age structure will not be realized at the current trajectory, with underinvestment and underperformance pointing instead towards a demographic disaster due to high unemployment, an uneducated and unskilled workforce, inadequate basic services, and insecurity.

27. To address these challenges, the Federal government established two special purpose funds: one for basic education—the Universal Basic Education Program (UBE)—and another for primary healthcare—the Basic Health Care Provision Fund (BHCPF). But these have been operating sub-optimally, and many gaps remain.

1.2 Program Description

28. To facilitate education and health efforts in Nigeria, the World Bank is proposing to support the Government of Nigeria (GoN) with a Program for Results (PforR) instrument referred to as Nigeria Human Capital Opportunities for Prosperity and Equality Program-For-Results (HOPE)- Governance (HOPE-Gov PforR) (hereafter, the Program). The total program cost is US\$500 million which will cover twenty five percent of the government's program.
29. HOPE-GOV covers a subset of actions from the government program and would run from 2024 to 2028. These actions will mostly be at the State level, but with a few at the federal level. The Program will support Nigeria in addressing underlying governance weaknesses in the systems and procedures of government that constrain outcomes in basic education and primary healthcare service delivery. Focus will be on cross-sectoral issues, such as improved financial resource allocation; efficiency of resources, strengthened public financial management (PFM), fiscal transparency and accountability; and enhanced human resource management. HOPE-GOV would be a PforR with IPF for technical assistance (TA) component (US\$20 million). This ESSA is structured around three results areas that cut across primary health care and basic education and focus on improved financial resource allocation, strengthened PFM, fiscal transparency and accountability, and enhanced human resource management. All three results areas will aim to strengthen mutual accountability loops by enhancing the collection and use of data, publication of fiscal data and facility level indicators, and establishing mechanisms for citizen engagement at key decision points.
30. The program development objective is to support the Federal Republic of Nigeria in strengthening financial and human resource management in basic education and primary healthcare sectors. The achievement of the result will be measured by the following PDO level indicators:
- a) **Indicator 1:** Number of states accessing the full UBEC matching grant and achieving at least 80% budget execution for basic education sub-sector.
 - b) **Indicator 2:** Number of States publishing financial and performance audits of the basic education and primary health sub-sectors.
 - c) **Indicator 3:** 70% of states with at least two designated primary health care facilities in 70% of their wards meeting the staffing criteria for and receiving National Direct Facility Funding from BHCPF (note: designated primary health care facilities are those selected to be part of the NPHCDA policy of the equivalent 2 PHCs per ward).
 - d) **Indicator 4:** Number of States that reduce staffing gaps in basic education and primary health care sectors by 40 percent, with at least 30% of new recruits being women.
31. The proposed DLIs based on the result areas are presented in Table 1.1.

1.3 Program Implementation and Institutional Arrangements

32. **The NPCU, will be domiciled in a Special Secretariat**, within the Ministry of Budget and Economic Planning, and will in providing administrative and technical support to the program, working in collaboration with the following Institutions – (i) Federal Ministry of Health and Social Welfare, its federal MDAs and counterparts at the state level; (ii) Federal Ministry of Education, its federal MDAs and counterparts at the state level; (iii) Federal Ministry of Finance, and its counterparts at the state level, (iv) State Ministries of Budget and Economic Planning; (v) The Universal Basic Education Commission and Universal Basic Education Boards at the state level; (vi) The Ministerial Oversight Committee (MOC) of the Basic Health Care Provision Fund (BHCPF) and all gateways and institutions participating in the BHCPF. The National Program Coordination Unit (NPCU) for HOPE-GOV will be headed by a National Program Coordinator (NPC), who shall, through the Permanent Secretary, Federal Ministry of Budget and Economic Planning (FMBEP), report to the Steering Committee of the HOPE-GOV. chaired by the Hon. Minister of Budget and Economic Planning.
33. States will mostly be responsible for achieving the program results and thus will be leading the implementation of the PforR component, with a few results to be achieved at the federal level. To support the implementation of the Program in each State, a State Technical Committee will be established in each of the participating States. The membership of the committee will include representation from the key MDAs responsible for achieving the DLIs: Ministries of Finance, Budget and Economic Planning, Education, Health, and Office of the State Accountant Generals. The State Ministries of Budget and Economic Planning will be the state program coordination anchors, and the Commissioners will chair the States' Steering Committees. The Technical Committees will assign focal persons to coordinate the implementation of the Program across the key result areas and the coordination of the TA activities at the state level. Key responsibilities of each State Technical Committee are to approve the annual state HOPE-GOV action plan for achieving the Eligibility Criteria and the DLRs, which should include the annual capacity building activities for the state, to monitor progress of the annual state action plan, to review the state's result in the APA by the IVA, and to take remedial action if the state is unable to achieve the Eligibility Criteria and/or the DLRs.
34. The NPCU will principally, also be responsible for – (i) Overall coordination of the Program; (ii) Engagement and supervision of Independent Verification Agent (IVA); (iii) Monitoring and Evaluation of the program implementation; (iv) Technical support and capacity building; (v) Fiduciary Management.

1.4 Program Boundaries and Activities

35. The program boundary is summarized in Table 1.1.

Table 1.1: HOPE Program Boundary

	Government's UBE Program	Government's Basic Health Care Program	HOPE PforR Program	Reasons for non-alignment
Objective	Accelerated, sustained, inclusive and equitable provision of quality basic education for all children	To improve primary health care in support of achieving universal health coverage	To improve human capital service delivery through strengthening allocation and utilization of financial and human resources in basic education and primary health care	Sectoral objectives are aligned. HOPE-GOV focuses on systems strengthening
Duration	2023-2030	Not determined yet	2024-2028	HOPE-GOV is a time-slice
Geographic coverage	National	National	Open to all states but participating states must achieve eligibility criteria as a prerequisite	No difference
Results areas	Providing financing, enhancing access for learning, teacher management system, and sector coordination	Providing financing, enhancing access to basic health care, quality of care, governance, enabling high-performing health workforce, strengthening institutions, partnerships and community engagement	RA1: Increasing allocation and equity of financing RA2: Enhancing transparency and accountability RA3: Improving HR recruitment, deployment, and performance management	Aligned but the focus is on system strengthening
Overall Financing	US\$1.27 billion	US\$0.64 billion	US\$470 Million results-based S\$20 million IPF	Accounts for 25 percent of the Government's program

36. The PforR will support the Government program's action plan, reorganized into three result areas and six disbursement-linked indicators (DLIs) with the following activities:

- a) **Result Area 1: Increased availability and effectiveness of financing for basic education and primary health care service delivery.** This results area focuses on the following areas:
- (i) Securing and increasing funding for health and education at the federal and state level;
 - (ii) Establishment of a need-based and performance-based system for allocating UBE and

BHCPF resources across and within states, and (iii) Strengthening credibility and predictability of federal and state funding for basic education and primary health care.

- b) **Result Area 2: Enhance transparency and accountability for basic education and primary health care financing.** This results area will incentivize (i) timely and consistent publication of budget and budget implementation/execution, to enable budget management; (ii) Improving the procurement process for transparency and value for money. These actions will help identify deviations from the planned budget and allow for timely corrective actions where possible.
- c) **Result Area 3: Improve recruitment, deployment, and performance management of basic education teachers and primary health workers.** This results area will incentivize (i) the enhancement of the sector and workforce planning function, (ii) reduction of significant staffing gaps and improve the deployment and management practices for basic education and primary health care workers, and (iii) adoption of new or existing systems such as the Central Bank of Nigeria Bank Verification (BVN) and National Identity Numbers platforms to check payroll fraud, biometric check-ins where available, community monitoring, performance bonuses, automatic payroll deductions. .

37. The disbursement-linked indicators for each of the result areas are as follows:

38. Result Area 1: Increasing the availability and effectiveness of financing for basic education and primary health care service delivery.

- a. **DLI 1. “Enhance access and equity of UBEC financing of basic education.”** This DLI incentivizes the revision of UBEC guidelines to help ensure more flexibility and increase state’s access to UBEC funds as well as enhancing the equity principle into the disbursement formular thus the availability of funds in the areas where they have the most needs.
- b. **DLI 2: “Strengthened state budget planning and execution for basic education and primary health care.”** This DLI will address the challenges of fragmentation and lack of coordination across funding sources that undermine strategic use of resources for primary health and basic education. It will support states to prepare holistic and realistic, costed annual budget submissions for the primary education and basic health care underpinned by a strategic annual investment/operational plans and data-driven analysis on how to improve outcomes in the two sectors. Increased budget realism will address the challenge of budget credibility. The second part of this DLI will incentivize increased budget execution rates, especially for non-salary items, from low baselines, while the third part will incentivize better budgeting at the local governments through the adoption of the COFOG compliant national chart of accounts.

39. Result Area 2: Enhanced transparency and accountability of federal funding for basic education and primary healthcare

- a. **DLI 3: “Strengthened accountability and transparency of funding for basic education and primary health care.”** This DLI will support the Federal Level timely publication of fiscal data for transfer of basic education and primary healthcare funds from the federal level to the states. UBEC and MOC will be required to publish online the dates, amounts and State recipients of all UBEC and BHCPF releases within 30 days of the release, and to publish as the States audited financial statements by May 31 of the following year.
- b. **DLI 4: “Strengthened accountability of funding for basic education and primary health.”** This DLI will support the state level financial reporting and audit. DLR 4.1 will support timely publication of budgets and citizens’ performance audit reports for BED and PHC sectors. DLR 5.2 will support states to publish annual financial and performance (value for money) audits of BED and PHC sub-sectors in the citizens formats that can easily be understood by the citizens.

40. Result Area 3: Improved recruitment, deployment and management of teachers and primary healthcare workers

- a. **DLI 5: “Increased number of teachers and primary health care workers deployed.”** This DLI will support states to carry out a baseline mapping exercise on staffing and location of gaps, recruitment of new or redeployment of existing staff to fill the identified gaps and report on actions taken and progress in filling the staffing gap and improving equitable deployment. Disbursements will be scalable in accordance with the percentage reduction in the staffing gaps.
- b. **DLI 6: “Improved payroll and performance management for teachers and health workers.”** This DLI will support states to adopt and implement new or existing systems to check payroll fraud in basic education and primary health care. Schemes can include the Central Bank of Nigeria Bank Verification Numbering (BVN) system and National Identity Numbers platforms, b payroll deductions. Disbursements will be scalable in accordance with attendance improvements over the previous year.

1.5 Excluded Activities

41. The Program will exclude activities that do not meet the World Bank’s Policy on eligibility for PforR financing (September 2020). The borrower shall ensure that the Program excludes any activity which, in the opinion of the World Bank, are likely to have significant adverse impacts that are sensitive, diverse or unprecedented on the environment and/or requires significant land acquisition, displacement and or resettlement of affected people.

Given that the HOPE-PforR Program is an institutional reform program, it will not support investments with high environmental and social risks for example, construction and

infrastructure development. It will not accommodate involuntary displacements and resettlements. Thus, any Program activity that entails land acquisition, negative impact on natural habitat and cultural resources, public and worker's health and safety will not be funded under the PforR without adequate environmental and social management. **1.6 Scope of the Environmental and Social Management System Assessment (ESSA)**

42. The ESSA for the program examines the extent to which the Federal and State Government's existing environmental and social management systems: operates within, an adequate legal and regulatory framework to guide environmental and social impact assessments, mitigation, management and monitoring at the PforR Program level; It evaluates how the system incorporates recognized elements of good practice in environmental and social assessment and management, via due diligence including: (i) early screening of potential impacts; (ii) the consideration of strategic, technical, and site alternatives (including the "no action" alternative); (iii) explicit assessment of potential induced, cumulative, and transboundary impacts; (iv) the identification of measures to mitigate adverse environmental or social risks and impacts that cannot be otherwise avoided or minimized; (v) clear articulation of institutional responsibilities and resources to support implementation of plans; and (vi) responsiveness and accountability through stakeholder consultation, timely dissemination of the PforR Program information, and responsive grievance redress mechanisms; among others. Based on these findings, the ESSA thereafter defines measures to strengthen the system and recommends measures that will be integrated into the overall Program.
43. This ESSA has been prepared for the HOPE-Gov Program to ensure consistency with the "core principles" outlined in the World Bank's policy for the PforR instrument to effectively manage the Program's risks and impacts while promoting sustainable development. These six core principles are:
- a) **Environment:** To promote environmental and social sustainability in the Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program's environmental and social impacts.
 - b) **Natural Habitats and Cultural Resources:** To avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program.
 - c) **Public and Worker Safety:** To protect public and worker safety against the potential risks associated with: (a) construction and/or operations of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
 - d) **Land Acquisition:** To manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assists the affected people in improving, or at the minimum restoring, their livelihoods and living standards.
 - e) **Vulnerable Groups:** To give due consideration to the cultural appropriateness of and equitable access to Program benefits, giving special attention to the rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

f) **Social Conflict:** To avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial dispute.

44. In line with the six core principles above, the relevant risks associated with the HOPE Program and within the proposed Result Areas (RAs) under the PforR covers environmental and social issues and include:

- a. Potential increase in generation of healthcare wastes due to the expansion in the number and optimization of Public Primary Healthcare Facilities.
- b. Potential discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of women in recruitment, deployment, and performance management of teachers and primary health workers.
- c. Release of annual statutory allocations for UBEC and BHCPF and enhanced efficiency and equity of UBEC financing of basic education which will increase state discretion on the use of funds for state priority needs could result in investments in the rehabilitation/refurbishment of schools, which could lead to negative environmental and social impacts associated with rehabilitation, for example, generation of solid waste, noise, and air pollution.
- d. Rehabilitation work can also impact workers' health and safety.

45. The details of the applicability of Core Environmental and Social Principles (CP) to HOPE PforR Result Area and Disbursement Linked Indicators (DLIs) are presented in Annex 1. A summary of DLI applicability by Core Principle is presented in the table below:

Table 1.3: Summary of DLIs Applicability by Core Principle

DLI #	DLI Description	Applicability by Core Principle	
		Environment	Social
DLI 1	Enhanced access and equity of UBEC financing of basic education	CPI	CP3-
DLI 2	Strengthened state budget planning and execution for basic education and primary health care	CP1	CP3
DLI 5	Increased number of teachers and primary health care works deployed	CP1	CP5, CP6
DLI 6	Improved payroll and performance management for teachers and health workers	CP1	CP5

1.7 Objectives of this ESSA

46. The specific objectives of this ESSA are to:
- a) Identify the potential environmental and social impacts/risks applicable to the Program's interventions.
 - b) Review all relevant Nigerian policy and the legal framework of the Government of Nigeria (GoN) and relevant State Governments related to the management of environmental and social impacts of the Program's interventions.
 - c) Review the environmental and social due diligence management procedures and institutional responsibilities that the GoN is using for the HOPE-GoV program.
 - d) Assess capacity within domestic revenue generation institutions and Environmental and Social management within the public sector operating systems of the GoN put in place for environmental and social impact management within the Program system.
 - e) Assess the Program's system performance concerning the core principles of the Program-for-Results (PforR) instrument, as well as identify gaps in the Program's performance.
 - f) Recommended actions to fill gaps identified that will be embedded into the Program Action Plan (PAP) to strengthen the Program's performance with respect to the core principles on Environment and Social of the PforR instrument to ensure sustainable implementation via good due diligence.
47. The overall environmental and social risks have been assessed and deemed to be **Moderate**. Although the Program does not involve construction works and program activities are not likely to require significant changes to the borrower's overall environmental systems, the program was generally assessed as moderate because there could be rehabilitation works due to increased funding for non-salary items for PHC and basic education and also the envisaged social risks associated with recruitment and deployment and biometric check-ins of teachers and health workers in Result Area 3 (specifically DLI5 and DLI6).

1.8 Approach of ESSA

48. The World Bank team prepared the ESSA through a combination of detailed reviews of existing program materials and available technical literature, including policies, regulations, guidelines and examples of due diligence and design documents, interviews and extensive consultations with government staff, non-governmental organizations, regulatory agencies, private sector organizations and sector experts associated with public revenue generation. Based on the analysis conducted, the findings, conclusions and opinions expressed in the ESSA are those of the Bank.
49. An environmental and social risk screening of proposed activities was undertaken at the concept stage. The purpose of the screening was to:
- Confirm that there are no activities which meet the defined exclusion criteria included in the PforR in line with the Bank Guideline for the ESSA; and

- Establish the initial scope of the ESSA. This includes identification of relevant systems under the PforR and relevant stakeholders for engagement and consultations.
50. The ESSA process was informed by the Bank Guidance on PforR Environmental and Social System Assessment (September 2020). The guidance sets out core principles (See Section I.5) and planning elements used to ensure that PforR operations are designed and implemented in a manner that maximizes potential environmental and social benefits while avoiding, minimizing or mitigating environmental and social harm.
51. Following the initial screening, the system review was conducted using a two-step approach:
- Identification of relevant systems that are pertinent to the ESSA was addressed in Section IV which presents an overview of relevant government environmental and social management systems; and
 - Assessment of Client’s environmental and social management systems for consistency with the applicable Core Principles, including capacity and enforcement of certain environmental and social measures, was addressed in Section V, while environmental and social recommendations were addressed in Section VI.

SECTION II: STAKEHOLDER CONSULTATION

52. This section summarizes the stakeholder consultation activities undertaken for the ESSA.
53. The ESSA process includes extensive stakeholder consultations and disclosure of the ESSA Report, in accordance with the World Bank Policy and Directive for Program for-Results Financing and Access to Information Policy. Currently, the ESSA consultation process is embedded in the Program consultation process. Feedback from stakeholders have been instrumental in designing and revising the Program Action Plan, indicators, and program operations manuals and appraisal documents via providing data and details on the existing situation, management status and government priorities regarding primary health care and basic education.
54. Initial consultations with the government and a large group of stakeholders over a period led to the formulation of the HOPE PforR. The outcomes of those consultations are embedded in this program and have influenced its design.
55. Further consultations were held with State government stakeholders on the 22nd and 24th of April 2024 for states in Northern Nigeria and Southern Nigeria, respectively.
56. The stakeholders consulted include the Directors from the State Ministry of Budget and Economic Planning, State Ministry of Education, SUBEB, State Ministry of Health, State Primary Health Care Development Boards, and State Health Insurance Agencies.
57. Three states from Northern Nigeria, namely Kwara, Borno and Nasarawa on the 22nd of April and Taraba on the 24th of April. On the other hand, five states from Southern Nigeria, namely Anambra, Enugu, Osun, Rivers and Ogun participated in the discussion. The attendance list is presented in Annex 5.
58. During the discussion, the stakeholders received detailed information about the purpose of the consultation and the HOPE program, including the project development objectives, the result areas, and the DLIs. The World Bank team also inquired from the stakeholders about the capacity of the states to handle E&S issues. Several questions based on the result areas were raised by the World Bank team, to which representatives from the states responded. The questions centered on the capacity of the states to handle E&S issues in procurement, availability of legislations and regulations and procedures for handling ESIA, ESMP, solid waste management, healthcare waste management, grievance redress mechanism, gender-based violence and sexual harassment, OHS procedures, social inclusion, among others. Some of the discussion questions and responses by the states regarding the result areas are presented in Tables 2.1 and 2.2. The details are in Annex 3 and 4.

Table 2.1: Questions and Responses Regarding Result Areas 1 and 2

Question	How do you handle safeguard issues (environmental and Social) in your procurement?
State	Response
Osun	We have a robust procurement law that incorporates provisions for tender bidding, ensuring environmental and social issues are addressed. We conduct

	all procurement activities within the boundaries of this law; they do not operate outside of it. They strictly adhere to the details outlined in the procurement process.
Rivers	The River State Bureau of Public Procurement (BoPP) oversees all procurement activities, particularly those related to construction and civil works. The BoPP must oversee all such projects. Additionally, they handle environmental impact assessments with dedicated consultants for this purpose. Within the ministry, there are separate units for project management and procurement. Collaboration between the ministry and the BoPP ensures effective oversight and coordination of procurement processes.
Anambra	Anambra's Bureau of Public Procurement (BoPP) handle all procurement issues. The Environmental and Social (E&S) officers ensure that all procurement activities incorporate E&S concerns. The BoPP centrally manages procurement processes across the state.
Enugu	Established both the BoPP and the due process unit. This agency and the unit ensures that procurements adhere to the laws and regulations.
Taraba	Taraba has a BoPP and a law that governs procurement issues.
Ogun	
Kwara	E&S is an important part of procurement. Procurement considers issues related to location, the project, and the socio-cultural needs of individual community members. We take into account the cost implications, procurement of materials, and other fundamental aspects of procurement policy. The state has a public procurement agency that deals with procurement issues.
Borno	
Nasarawa	We have a robust Nasarawa State Bureau of Public Procurement. Procurement is initiated in the state. The efficiency unit in the Ministry of Finance vets procurement and safeguards issues before procurement. In the absence of the safeguards office, the procurement will be discarded, and the attention of the officer will be called upon.
Question	Do you have experience preparing Environmental and Social Management Plans (ESMP) and Environmental and Social Impact Assessment (ESIA)? If yes, describe how it was carried out in one of the ministry's projects.
State	Response
Osun	Yes, the World Bank implements programs and interventions in the state and collaborates with consultants to develop the necessary instruments. Oversee all agencies that handle intervention in the ministry of budget and planning but need the project manual.
Rivers	Yes, they have a project unit attached to the Ministry of Health. The project unit engages consultants who work alongside with architects, engineers and surveyor to assist with preparations. Regarding the P4R initiative, they focus solely on innovation and do not undertake any construction projects

Anambra	They work with the WB during program inception, and the plans are developed. They got a consultant who liaised with an on-ground E&S officer to develop an E&S impact assessment for a project.
Enugu	Has robust social protection bodies developed by an assembly of concerned stakeholders for the state that passed through concerned areas for social issues and has a legal framework. The system incorporates gender-specific safeguards to protect vulnerable groups. Environment issues are within the purview of the Ministry of Environment.
Taraba	Ministry of Environment
Ogun	We developed social issues plan in collaboration with the Women Advocate Research Documentation Center and other government agencies, including the Ogun State Primary Healthcare Board. The desk officer, who was part of the training, is involved. Other collaboration plans with NGOs may exist. Though the respondent was not well-versed in the environmental plan, I'll contact the Ministry of Environment for details.

Table 2.2: Questions and Responses Regarding Result Area 3

Question	How do you handle complaints and grievances? Do you have a framework, procedure, legislation or regulation for redressing grievances? Do the Ministry and Agencies have a grievance redress mechanism?
State	Response
Osun	In schools, we have a disciplinary committee headed by a senior teacher who listens to the complaints of the students. There are also suggestion boxes where grievances are dropped. The committee makes a decision on the grievances.
Rivers	There are administrative protocols that addresses different types of grievances in the schools and workplace to ensure fair hearing and justice is served
Anambra	Has GRM framework in MDA which is a bottom-top approach
Enugu	Depending on the aggrieved person, for a learner, it starts from class management and escalated to the school management and further to the system management. For teachers, it goes to the management of the institution and scaled up to the management of the system until it is resolved
Taraba	
Ogun	Teacher can register their complaint through school head to zonal level and district and addressed
Kwara	Yes, GRM is functional in all 193 wards of the states, and there is a suggestion box in all wards. The social safeguard officer may resolve some complaints, and if cascaded, individuals from the ministry or community may handle them.
Borno	Yes, they have established GRM in the school communities. There are suggestion boxes, and there are telephone lines that can be called. There are GRCs in all communities. The secretary receives the complaint and calls for the

	GRC to sit down and resolve it with the aggrieved party. There is a framework in place.
Nasarawa	Yes, GRM is in SPHCDA and the state health insurance agency. The latter handles complaints about services provided by the agency. There are numbers available to all, and they address them. Quality control swings into action if it is escalated. QC also handles it if it is above the Local Government level at SPHCDA. A framework was adopted from the NSHIP project in their operation around services at the facility level. Each agency has a GRM, and most start from the lower level all the way up. For the health insurance scheme, each beneficiary has access to a phone number on their health card, which they can call to lodge their complaints.
Question	Can marginalized people or those who feel they were not appropriately treated have a procedure to report their grievance? Do you have a mechanism to address the issues to the satisfaction of the complainants? Please give an example of how you handled this in the past.
State	Response
Osun	Suggestion box is provided at the entrance for complains for those who complaints of marginalization. HIV patient was marginalized as no nurse wanted to attend but reported to the management and was treated
Rivers	Complaints can be addressed formally and informally but the complainant needs to lay the complaint
Anambra	
Enugu	Every class has a form master. If not addressed, it is scaled up to the principals, UBEC until resolved to the satisfaction of the complaint
Taraba	
Ogun	
Kwara	A team constitutes the GRC, with the ward chairman as head. Provision of micronutrient powder to children under 5, where some were excluded, was a result of fatigue from the community volunteers. GRM box and a GRM or line to be called
Borno	There is a suggestion box in the school committees where the GRC sits to deliberate on issues. E.g., renovation in one of the schools, and some classes do not have ramps, and the component lead was informed, who informed the SBMC, and the feedback on including ramps was communicated to the aggrieved person within a week.
Nasarawa	There is a client satisfaction survey conducted quarterly in the area of delayed services to gather information from marginalized people to address issues relating to them. This is a result of limited human resources.

59. The findings and report of ESSA were presented to the stakeholders on August 6, 2024. Representatives from the Federal Ministry of Budget and Economic Planning, Federal Ministry of Education, State Ministry of Economic Planning, Budget and Development, World Bank (WB) attended the meeting.

60. During the meeting, the World Bank team presented a paper on the purpose of the consultation, the ESSA objectives, and the methodology. They equally provided a summary of the potential environmental and social risks and benefits of the HOPE-PforR, an overview of the relevant government environmental and social management systems, a summary of the systems assessment, and the program action plan (PAP), which includes the activity description, due date for activity implementation, description, and completion measurement. The comments/ questions by the attendees and the response from the World Bank team are in Table 2.3 below.

Table 2.3: Questions and comments by attendees and repose from the World Bank Team

S/N	Questions/Comments	Response
1	Need to formally constitute the Program Management Unit from each of the Implementing Agencies under HOPE	The Program design is still going through the Bank processes which includes appraisal, negotiation with the Federal Ministry of Finance and Approval by the Bank Board. All these steps will need to be concluded. The FMBEP will continue to organize additional consultations with stakeholders from Health and Education.
2	Disclosure requirements for the E&S documents	Per the requirement of the Federal Ministry of Environment, the documents prepared for the Environmental and Social Assessments would need to be formally disclosed to ensure that stakeholders and citizens review the document, make comments and documents improved upon.
3	Funding availability for the engagement of the Environmental and Social Officers	The availability of staff for the Environmental and Social role will be sourced within the implementing agencies and where skills are not identified, the staffing will be sourced from the Ministry of Environment and Women Affairs respectively.

SECTION III: DESCRIPTION OF EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL IMPACTS

3.1 Overview of Program Risks and Benefits

61. Low levels of investment in primary health and basic education, poor governance and shortage of human resources are the bane of health and education outcomes in Nigeria. Public sector spending on education (ten percent of the national budget, 1.2 percent of GDP and \$23 per capita) and health (seven percent of the national budget, 0.8 percent of GDP, \$15 per capita) are among the lowest in the world. Besides, earmarked funds have largely displaced state investments, while the poor planning and governance arrangements over the funds result in cumbersome procedures for accessing them, untimely disbursements, and a lack of transparency and accountability for the funds. While Nigeria suffers from a shortage of qualified professionals, including teachers and health workers, compared to LMICs. These are also highly unequal across regions/states. Recruitment of teachers or nurses suffers from a lack of planning, is often not properly costed and is not always based on merit and transparency. Once professionals are recruited, their deployment is suboptimal and not aligned to guarantee learning and basic health care for all. The World Bank is supporting the government of Nigeria through a hybrid program to increase the financing available for primary health care and basic education, enhance transparency and accountability in primary health care and basic education and improve recruitment, deployment and performance management of teachers and primary health workers through the HOPE-Gov.

62. The PforR component of HOPE-Gov will generate some E&S benefits and risks. The environmental risks include possible rehabilitation of infrastructure, which would pose some environmental risks. On the other hand, the environmental benefits are minimal and limited to the benefits from reduced paper use, especially e-procurement, which will lead to reduced use of paper and hence conservation of forests as trees from forests are used in paper production and energy efficiency and climate sensitivity for construction and rehabilitation. The detailed range of key environmental and social risks and benefits associated with specific DLI in HOPE-Gov PforR is presented in Annex 2.

3.2 Expected Environmental Benefits

63. The PforR program will deliver minimal direct and indirect environmental benefits. Environment benefits will be achieved through DLI 2 as the guidelines for preparation of realistic, costed annual budget submissions for the two sub-sectors will also cover energy efficiency and climate sensitivity for construction and rehabilitation and deliver climate co-benefits. Also, direct environmental benefits will accrue from achieving DLI 6, which involves e-procurement system. Given e-procurement, papers would no longer be used, thus saving forests/trees used to manufacture papers.

Expected Environmental Risks and Impacts

64. The HOPE PforR has some activities that are expected to impact the environment. Rehabilitation activities could be conducted under the PforR due to activities to enhance efficiency and equity of UBEC financing of basic education (DLI 1) and activities under DLI 2

(Strengthened state budget planning and execution for basic education and primary health care). Thus, environmental risks associated with rehabilitation, such as solid waste, noise and air pollution, will impact the environment.

65. Given the increased funding for primary healthcare, expanding the number and optimizing public primary healthcare facilities could also increase the generation of healthcare waste.

3.4 Expected Social Benefits

66. The HOPE PforR has many social benefits that will result from achieving the DLIs. These benefits include enhanced health outcomes, enhanced literacy and numeracy among school children, reduced infant and maternal mortality rates, increased life expectancy, reduced number of out-of-school children (OOSC), enhanced performance of pupils and students in basic education, enhanced economic development, and poverty reduction, especially among the most vulnerable. The pathway for the social benefit of the intervention is shown in Figure 3.1 below.

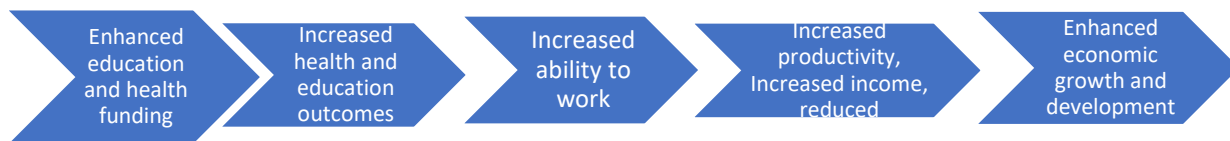


Figure 3.1: Pathway of social benefits of increased funding and other interventions under the Program.

67. Enhanced efficiency and equity of UBEC financing of basic education (DLI1) and strengthened state budget planning and execution for basic education and primary health care (DLI2) will facilitate the procurement of materials and equipment needed to enhance teaching and learning in basic education and equipment needed to enhance primary health care and thus better education and health outcomes. Evidence shows that increased per-pupil spending led to higher graduate rates, higher adult wages, and reduced likelihood of adult poverty with more impact on students from low-income households². Also, stable, predictable and increased funding may be applied for rehabilitation, leading to increased employment for the locals who may be engaged in menial jobs. Besides, the rehabilitation may lead to an influx of workers into the communities, thus enhancing the local economy.

68. Achievement of DLI 4 (Strengthened transparency of funding for basic education and primary health care) and DLI3 (Strengthened accountability of funding for basic education and primary health) will foster greater service delivery and public confidence in primary health care and basic education. This will thus ensure the reduction in maternal mortality rates, increased life expectancy, reduction in the number of out-of-school children, enhanced performance of pupils and students and other benefits.

² Institute for Policy Research (2017) Policy Research Brief. <https://www.ipr.northwestern.edu/documents/policy-briefs/school-spending-policy-research-brief-Jackson.pdf>

69. In addition, increased number of teachers and primary health care workers in DLI 5, will guarantee that enough personnel (teachers and health workers) are available in primary schools and health centres, especially in rural communities, many of which lack teachers and health workers. This will ensure that education and health services are brought closer to the people, thus facilitating the reduction in maternal and child mortality rates, reduced OOSC and improved performance by pupils and students under basic education. Also, improved payroll and performance management for teachers and health workers (DLI 6) using multiple mechanisms such as biometric check-ins, community monitoring, performance bonuses, automatic payroll deductions will help eliminate the incidence of ghost workers and preserve resources to be deployed to other important aspects (non-salary items) of primary health care and basic education in the states. This will, in turn, facilitate the development of primary health care and basic education in the states with its associated benefits.

3.5 Social Risks and Impact

70. The HOPE-Gov PforR is also associated with some social risks. Enhanced efficiency and equity of UBEC financing of basic education (DLI1) and strengthened state budget planning and execution for basic education and primary health care (DLI2) could potentially impact workers' health and safety for workers involved in rehabilitation works that may be associated with these DLIs. The workers may be exposed to pollution caused by dust and noise at the work site. There could also be an influx of workers to the communities where rehabilitation work will occur. This may affect the communities as there could be cases of sexual abuse and other vices, for example, drug abuse.

71. There could be potential discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of women while deployment for basic education teachers and primary health care workers DLI 5. In addition, although social conflict as envisaged by ESSA, especially regarding armed conflict, is not applicable, discrimination along the lines of ethnicity and religion in the recruitment of teachers and health workers can result in complaints, social unrest, and demonstrations.

SECTION IV: OVERVIEW OF RELEVANT BORROWERS ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

72. The government of Nigeria (GON) has several policies, instruments and laws which support environmental and social management and environmental and social impact assessment processes. There are a number of sectoral policies which provide directives to integrate environmental and social considerations in the decision-making process to avoid or minimize impacts associated with program implementation. This section summarizes the policy, regulatory, institutional and legal frameworks for environmental management Nigeria.

4.1 The Constitution of the Federal Republic of Nigeria (1999)

73. The basis of environmental policy in Nigeria is contained in the 1999 Nigerian Constitution of the Federal Republic of Nigeria. Pursuant to section 20 of the Constitution, the State is empowered to protect and improve the environment and safeguard the water, air and land, forest, and wildlife of Nigeria. In a similar way, social policy in Nigeria also originates from the 1999 Nigerian Constitution of the Federal Republic of Nigeria. Section 17 encourages the state to pursue equality of rights, equal pay for equal work, obligations, opportunities and human dignity for all citizens. In addition, the state shall avoid social exclusion and discrimination of any form including gender, protection of children and vulnerable from any exploitation and moral and material neglect. The state will also promote equal access to facilities including education centers, health services.

4.2 Policies Relevant to the HOPE Program

74. The national policies relevant to the HOPE PforR is presented in Table 4.1.

Table 4.1: Nigerian Policies Relevant to the HOPE Program

Policy	Objectives
National Policy on the Environment (Revised 2016)	<p>Overall Policy Goal To define a new holistic framework for guidance, management and protection of the environment as well as the conservation of natural resources for sustainable development' of the country.</p> <p>Objectives</p> <ul style="list-style-type: none"> ▪ Ensuring and securing the quality of Nigeria's environment to support good health and well-being; ▪ Promoting efficient and sustainable use of Nigeria's natural resources and the restoration and maintenance of the biological diversity of ecosystems; ▪ Promoting understanding of essential linkages between the environment, social and economic developmental issues; ▪ Encouraging individual and community participation in environmental improvement initiatives; ▪ Raising public awareness and engendering a national culture of environmental preservation; and ▪ Building partnership among all stakeholders, including government at all levels, international institutions and governments, non-governmental agencies and communities on environmental matters.

Policy	Objectives
National Policy on Education	National Policy on Education (NPE), 2013: The Policy is established to ensure proper administration, management, and implementation of the educational system in all areas of the society. It provides the direction for educational activities with the aim of achieving three (3) major objectives which are as follows: (a) to equalise educational opportunities for all children, (b) to provide adequate education for all handicapped children, and (c) to provide opportunities for exceptionally gifted.
National Health Policy	The National Health Policy and Strategy to Achieve Health for All Nigerians, promulgated in 1988, was the first comprehensive national health policy and it was acclaimed to be a good policy document. But this was 16 years ago. Between then and now, many things have changed and it is, therefore, necessary to review the policy to reflect the new realities and trends in our national health situation.
National Gender Policy (2006)	<p>Overall Policy Goal</p> <p>The goal of the gender policy is to “build a just society devoid of discrimination, harness the dull potentials of all social groups regardless of sex or circumstance, promote the enjoyment of fundamental human rights and protect the health, social , economic and political well-being of all citizens in order to achieve equitable rapid economic growth, evolve an evidence based planning and governance system where human, social, financial and technological resources are efficiently deployed for sustainable development”. One of the principles of the gender policy is a general recognition that gender issues are central and critical to the achievement of national development goals and objectives and by extension water, sanitation and hygiene programs.</p> <p>Objectives</p> <ul style="list-style-type: none"> ▫ Establish the framework for gender responsiveness in all public and private spheres and strengthen capacities of all stakeholders to deliver their component mandate of the gender policy and National Strategic Framework ▫ Develop and apply gender mainstreaming approaches, tools and instruments that are compatible with the macro- policy framework of the country at any given time towards national development. ▫ Adopt gender mainstreaming as a core value and practice in social transformation, organisational cultures and in the general polity in Nigeria. ▫ Incorporate the principles of CEDAW and other global and regional frameworks that support gender equality and women empowerment in the country’s laws, legislative processes, judicial and administrative systems ▫ Achieve minimum threshold of representation for women in order to promote equal opportunity in all areas of political social and economic life of the country for women as well as for men. <ul style="list-style-type: none"> ▫ Undertake women and men- specific projects as a means of developing the capabilities of both women and men, to enable them take advantage of economic and political opportunities towards the achievement of gender equality and women’s empowerment. ▫ Educate and sensitize all stakeholders on the centrality of gender equality and women’s empowerment to the attainment of overall national development.

4.3 Relevant National Laws

75. The national laws relevant to the HOPE PforR is presented in Table 4.2.

Table 4.2: Nigerian Laws that are Relevant to the HOPE Program

S/N	Law	Description/Summary of Objectives
Environmental Acts		
1	EIA Act - CAP. E12 L.F.N. 2004	<ul style="list-style-type: none"> ▪ The main aim of the Act is to ensure environmentally sound and sustainable development projects. ▪ To carry out an EIA on all projects likely to have significant impact on the environment ▪ Encourage information exchange and consultation between all stakeholders when proposed activities are likely to have significant impact on the environment.
2	National Environmental Standards and Regulations, Enforcement Agency Act, (NESREA) 2007	<ul style="list-style-type: none"> ▪ Enforce compliance with national (and international) laws, legislations, guidelines, policies and standards on environmental matters; ▪ Coordinate and liaise with, stakeholders, within and outside Nigeria on matters of environmental standards, regulations and enforcement; ▪ Ensure that environmental projects funded by donor organizations and external support agencies adhere to regulations in environmental safety and protection; ▪ Enforce environmental control measures through registration, licensing and permitting Systems other than in the oil and gas sector; and ▪ Conduct environmental audit and establish data bank on regulatory and enforcement mechanisms of environmental standards other than in the oil and gas sector. <p>Some relevant sections include</p> <p><u>Section 7:</u> Authority to ensure compliance with all of Nigeria’s environmental laws and treaty obligations; and</p> <ul style="list-style-type: none"> ▪ <u>Section 8 (1) K and Section 27:</u> Authority to make and review regulations on air and water quality, discharge of effluents and other harmful substances as well as control of other forms of environmental pollution. ▪ The Agency has powers to: <ul style="list-style-type: none"> ▪ prohibit processes and use of equipment or technology that undermine environmental quality; ▪ conduct field follow-up of compliance with set standards and take procedures prescribed by law against any violator; ▪ subject to the provision of the Constitution of the Federal Republic of Nigeria, 1999, and in collaboration with relevant judicial authorities establish mobile courts to expeditiously dispense cases of violation of environmental regulation.
Social Acts		
5	Trade Union Amended Act 2005	<ul style="list-style-type: none"> ▪ Makes provisions with respect to the formation, registration and organization of trade unions, and the Federation of Trade Unions ▪ It states, "notwithstanding anything to the contrary in this Act, membership of a trade union by employees shall be voluntary and no employee shall be forced to join any trade union or be victimized for refusing to join or remain a member". The amended Act, to ensure the funding of trade unions, empowers employers to make deduction from the wages of every worker who is a member of any of the trade unions for the purpose of paying contributions to the trade union so registered;
6	Employees Compensation Act (2010)	<ul style="list-style-type: none"> ▪ This Act repeals the Workmen Act of 1980. ▪ The objectives of the Act include Provide for an open and fair system of guaranteed and adequate compensation for all employees or their dependents for any death, injury, disease or disability arising out of or in the course of employment; ▪ provide rehabilitation to employees with work-related disabilities as provided in this Act;

S/N	Law	Description/Summary of Objectives
		<ul style="list-style-type: none"> ▪ establish and maintain a solvent compensation fund managed in the interest of employees and employers; ▪ provide for fair and adequate assessments for employers; ▪ provide an appeal procedure that is simple, fair and accessible, with minimal delays; and ▪ combine efforts and resources of relevant stakeholders for the prevention of workplace disabilities, including the enforcement of occupational safety and health standards.
7	Trade Dispute Act CAP. T8 LFN 2004	<ul style="list-style-type: none"> ▪ The Act makes provisions for the settlement of trade disputes and other matters ancillary thereto. The Act established the National Industrial Court. The Act provides for procedure of settling dispute before it is reported; apprehension of trade dispute by the Minister; reporting of dispute if not amicably settled; appointment of conciliator, etc. Regarding the procedure before dispute is reported, the Act provides that parties to the dispute shall first attempt to settle it by an agreed means for settlement of the dispute apart from the Act. It is only when this procedure fails or does not exist that the parties report within seven days and come together to settle the dispute under a conciliator. Notwithstanding this provision, the Minister can apprehend the dispute and decide on the cause of action for the settlement of the dispute.
8	Labor Act CAP L1 LFN 2004	<ul style="list-style-type: none"> ▪ Act provides for the protection of wages, contracts of employment and terms and conditions of employment as well as recruiting guidelines. It provides for special classes of worker and miscellaneous special provisions. The Act in the different parts made a lot of provisions to ensure that the interest of the worker is protected. For example, under protection of wages the Act made provisions to ensure that the worker's dignity regarding wages is maintained. For example, the Act provides in part 1No 2 that no employer shall impose in any contract for the employment of any worker any terms as to the place at which, or the manner in which, or the person with whom any wages paid to the worker are to be expended; and every contract between an employer and a worker containing any such terms shall be illegal, null and void
9	Child Right Act 2003	<ul style="list-style-type: none"> ▪ Incorporate into its laws all the rights guaranteed in the United Nations' Convention on the Rights of the Child. The U.N. convention, adopted in 1989, states that: "The child shall be protected against all forms of neglect, cruelty and exploitation. He shall not be admitted to employment before an appropriate minimum age; he shall in no case be caused or permitted to engage in any occupation or employment which would prejudice his health or education, or interfere with his physical, mental or moral development." The Act must be ratified by each state to become law in its territory.
10	Violence Against Persons (Prohibition) VAPP Act 2015	<ul style="list-style-type: none"> ▫ The Act was passed into law in a bid to eliminate violence in private and public life; prohibit all forms of violence, including physical, sexual, psychological, domestic, harmful traditional practices; discrimination against persons and to provide maximum protection and effective remedies for victims and punishment of offenders ▫ The content of the Act is rich in its provisions as it covers most of the prevalent forms of violence in Nigeria today ranging from physical violence; psychological violence; sexual violence; harmful traditional practices; and socio-economic violence. ▫ The National Agency for the Prohibition of Trafficking in Persons (NAPTIP) is named as the service provider. ▫ Under the VAPP Act, the following offences are punishable offences.; <ul style="list-style-type: none"> ○ rape, ○ spousal battery, ○ forceful ejection from home, ○ forced financial dependence or economic abuse, ○ harmful widowhood practices, ○ female circumcision or genital mutilation, ○ abandonment of children, ○ harmful traditional practices,

S/N	Law	Description/Summary of Objectives
		<ul style="list-style-type: none"> ○ harmful substance attacks such as acid baths, ○ political violence, ○ forced isolation and separation from family and friends, ○ depriving persons of their liberty, ○ incest, <ul style="list-style-type: none"> ▫ indecent exposure and violence by state actors (especially government security forces).
Education and Health Acts		
11	Compulsory, Free and Universal Basic Education Act	<ul style="list-style-type: none"> • This Act which took effect from 26th May 2004 was to ensure the Federal Government intervention for uniform and qualitative basic education in Nigeria, as assistance to states and local government areas which are constitutionally responsible for primary education. As stated in the Act, “without prejudice to the provisions of item 30 of Part II of the Second Schedule and item 2 (a) of the Fourth Schedule to the 1999 Constitution dealing with primary school education, the Federal Government's intervention under this Act shall only be an assistance to the States and Local Government in Nigeria for the purposes of uniform and qualitative basic education throughout Nigeria”. • The Act provides that every government in Nigeria shall provide free and compulsory free basic education for every child of primary and junior secondary school age and that parents shall send their children to school and ensure that their wards complete primary and junior secondary education. The government and stakeholders are to ensure that parents take their wards to school. The Act provides that services in public schools for primary and junior secondary education are free of charge. • The Act also established the Universal Basic Education Commission (UBEC) charged with the responsibility of policy formulation regarding basic education in Nigeria, receive block grant from federal government and allocate to states, among others. The Act also established the State UBEC and the local government education authority.
12	Nigeria National Health Act 2014	<ul style="list-style-type: none"> ▪ The Act provides the framework for the regulation, development and management of the national health systems and set standards for the regulation of the health system and sets standards for rendering health services in the country. The Act covers both the public and private providers of health services. ▪ It provides that the national health system includes the federal ministry of health, states ministry of health, FCT departments responsible for health services, parastatals under the ministries of health in federal and state, all local government areas health authorities, ward health committees, village health committees, private health care providers, traditional health care providers and alternative health care providers. The Act established the national health council and provided for the duties of the ministries of health headed by the Minister at the federal level and commissioners at the state level. It also established the national tertiary health institutions and committees among others.

4.4 Relevant Nigerian National Environmental Regulations

76. The national environmental regulations relevant to the HOPE PforR is presented in Table 4.3.

Table 4.3: Nigerian Regulations that are Relevant to the HOPE Program

S/N	Regulation	Objectives
1	National Environmental (Permitting and Licensing System) Regulations, 2009. S. I. No. 29.	The provisions of this Regulation enable consistent application of environmental laws, regulations and standards in all sectors of the economy and geographical regions.
2	National Environmental (Sanitation and Wastes Control) Regulations, 2009. S.I. No. 28	To provide the legal framework for the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution.

4.5 Nigeria's Institutional Framework

4.5.1 Federal Ministries Relevant to HOPE Program

77. The Federal Ministries whose functions and responsibilities are relevant to the HOPE PforR is presented in Table 4.4.

Table 4.4: Relevant Ministries and Agencies and Their Functions at the Federal Level

S/N	Ministry	Relevant Functions and Responsibilities
1	Federal Ministry of Finance, Budget and National Planning	In collaboration with the World Bank controls disbursement of funds. Program funds will be channeled through the Federal Ministry of Finance.
2	Federal Ministry of Environment (FMEEnv)	The focal ministry of environmental issues in Nigeria. They will lead in implementing environmental actions at the federal level as recommended in the PAP. They are also responsible for oversight and disclosure regarding EIA at the federal level.
3	The Federal Ministry of Labor and Employment	<ul style="list-style-type: none"> ▪ Development and promotion of productive employment policies and programs for employment generation and actualization of national employment policies of the Federal Government. ▪ Skills Development, upgrading, certification, placement and empowerment of artisans, tradesmen, and applicants in various areas of national needs ▪ Provision of Social Security Coverage, Welfare and Employee's Compensation to the nation's workforce ▪ Provision of Labor Protection Services, supervision, enforcement, Education, Promotion of Social Justice, Ratification, Implementation and Review of National Labor Laws and Policies including collective bargained agreements. ▪ Trade Unions Education and Training ▪ International Labor Diplomacy ▪ Promotion of Occupational Safety and Health under the Occupational Safety and Health Department ▪ Enforcement of the Labor Laws under the Inspectorate Department (INSP)
4	Federal Ministry of Women Affairs, Community and Social Development	<ul style="list-style-type: none"> ▪ The focal ministry of social issues in Nigeria. They will lead in implementing and monitoring environmental and social actions at the federal level as recommended in the PAP
5	Federal Ministry of Education	<ul style="list-style-type: none"> ▪ The Federal Ministry of Education (FME) is responsible for policy formulation, coordination and management of education at the federal level. It has a mission to "to use education as a tool for fostering the development of all Nigerian citizens to their full potentials, in the

		promotion of a strong, democratic, egalitarian, prosperous, indivisible and indissoluble sovereign nation under God". The ministry in collaboration with its agencies, especially UBEC, is the focal ministry responsible for the Implementation of the education aspects of the Program at the federal level.
6	Federal Ministry of Health and Social Welfare	The Federal Ministry of Health and Social Welfare has the mandate to ensures high-quality healthcare and vital services for a healthy Nigeria. It upholds global standards of excellence, striving for a prosperous nation through effective programs and assistance.

4.5.2 State Ministries Relevant to HOPE Program

78. The State Ministries whose functions and responsibilities are relevant to the HOPE PforR is presented in Table 4.5.

Table 4.5: Relevant Ministries and Agencies and Their Functions at the State Level

S/N	Ministry	Relevant Functions and Responsibilities
1	State Ministry of Finance, Budget and Economic Planning	<ul style="list-style-type: none"> In collaboration with the World Bank controls disbursement of funds. Program funds will be channeled through the State Ministry of Finance.
2	State Ministry of Environment (SMEEnv)	The focal ministry of environmental issues at the state level. All the states have a ministry responsible for environmental issues. The will lead in implementing environmental actions at the state level as recommended in the PAP. They are also responsible for oversight and disclosure regarding EIA at the state level. Some states have environmental protection and waste management agencies responsible for waste management and other environmental protection activities in the states.
3	State Ministry of Women Affairs, Community and Social Development	<ul style="list-style-type: none"> The focal ministry of social issues in states. They will lead in implementing and monitoring d social actions at the state level as recommended in the PAP
4	State Ministry of Education	<ul style="list-style-type: none"> The State Ministries of Education (SME) are responsible for policy formulation and management of education at the state level. Each of the 36 states and FCT has a ministry or department as in the case of FCT, responsible for education. The SME is the focal ministry in conjunction with UBEC is responsible for the implementation of the education aspect of the Program at the State level.
6	State Ministry of Health	<ul style="list-style-type: none"> The State Ministries of Health (SMoH) are responsible for policy formulation and management of health at the state level. Each of the 36 states and FCT has a ministry or department as in the case of FCT, responsible for health. The SMoHE is the focal ministry in conjunction with several other agencies for the implementation of the heath aspect of the Program at the State level.

SECTION V: ASSESSMENT OF THE CLIENT'S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

79. This section describes the E&S management systems in place to manage all identified E&S risks associated with the program interventions detailed in Section III, especially adverse impacts and risks. It describes the main elements of applicable client's systems and provides an analysis of the acceptability of these systems, considering the level of risk and the extent to which Borrower systems and practices are aligned with the World Bank's 6 core principles on E&S on Performance-for-Results financing. That is, the analysis will show the extent to which the applicable systems are consistent with the core principles and key planning elements expressed in the PforR Guidance Document. It also provides a review of aspects where gaps exist between the two systems. The assessment was done using the following criteria:

- An analysis of the strengths of the existing environmental and social due diligence system, or where it functions effectively and efficiently and is consistent with Bank Policy and Directive for Program-for-Results Financing.
- Identification of inconsistencies and gaps between the principles espoused in Bank Policy and Directive for Program-for-Results Financing and capacity constraints and gaps in existing capacity; and
- Based on the above findings, recommendations to fill gaps and proposed mitigation measures and actions to strengthen the existing system to ensure environmental and social soundness and long-term sustainability in line with the design and implementation and operation of program interventions across the project areas.

80. The summary of the assessments of Federal Government systems in line with the core principles is presented in section 5.1. Information from this analysis and the resulting identification of gaps and opportunities/actions were used to inform the recommendations presented for the program in terms of managing E&S aspects and have informed the preparation of the Program Action Plan (PAP).

5.1: Summary of Systems Assessment

Core Principle 1: General Principle of Environmental and Social Management

Table 5.1: Assessment Core Principle 1: General Principle of Environmental and Social Management

Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in Program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program’s			
<p>Bank Directive for Program-for-Results Financing: Program procedures will:</p> <ul style="list-style-type: none"> ▪ Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level. ▪ Incorporate recognized elements of environmental and social assessment good practice, including: <ul style="list-style-type: none"> ▪ early screening of potential effects; ▪ consideration of strategic, technical, and site alternatives (including the “no action” alternative); ▪ explicit assessment of potential induced, cumulative, and trans-boundary impacts; ▪ identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; ▪ clear articulation of institutional responsibilities and resources to support implementation of plans; and ▪ Responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures. 			
<p>Applicability: <u>YES</u> / NO</p> <p>The E&S team has conducted a screening of initial risks of the PforR. Environmental and social risks are posed due to strengthened predictability and timeliness of federal funding for basic education and primary health care in DLI1, enhanced efficiency and equity of UBEC financing of basic education in DLI2, strengthened state budget planning and execution for basic education and primary health care in DLI3, improved procurement practices for increased transparency and value for money (DLI6) and reduced absenteeism of teachers and health workers (DLI8).</p>			
Applicable RA/DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI1: enhanced efficiency and equity of UBEC financing of basic education</p> <p>DLI3: strengthened state budget planning and execution for basic education and primary health care</p> <p>DLI 6: Improved procurement practices for increased</p>	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ At the Federal level, National Policies, Acts, Regulations for environmental management as well as institutional system’s identifying environment procedures, roles and legislation to be followed in the country (See Chapter 4) are well defined and are consistent with Core Principle 1 of the Bank Policy and Directives on PforR Operation. ▫ The national EIA system (EIA Act No. 86 of 1992) provides a comprehensive legal and regulatory 	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ The EIA Act only focuses on the environmental standards. The World Bank standards on social issues is not addressed by the EIA particularly requirements on stakeholder engagement, labor, resettlement and land acquisition or ecosystem services. ▫ At the national level there is no direct/ single ministry that is responsible for the totality of the social sustainability components, that is required by the World Bank Standards. What we have are 	<ul style="list-style-type: none"> ▫ Support should be provided at specific project levels and a technical assistance component be used to fill capacity gaps and establish E&S risk management systems. ▫ There is also a need to strengthen the E&S capacity at the agencies responsible for the program implementation at the federal level namely UBEC, NHIA,. NPHCDA

<p>transparency and value for money</p> <p>DLI 8: reduced absenteeism of teachers and health workers</p>	<p>framework for environmental and social impact assessment that is broadly consistent with the Core Principle 1 of the Bank Policy and Directive.</p> <ul style="list-style-type: none"> ▫ Environmental Assessment (EA) Department of the Federal Ministry of Environment is responsible for ensuring that the environmental risks are assessed, and adequate measures are taken to mitigate and or manage potential project impacts in line with the Federal Republic of Nigerian EIA Act of 1992. ▫ NESREA is also empowered to enforce non-compliance with environmental laws and regulations. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ○ Most States in the federation have their own state environment Ministry or agency. ○ Most of the sample states have robust framework regarding environmental assessment and management, for example, Delta State has a environmental sanitation law, ecology law and waste management law. Lagos State has environmental protection law, etc. ○ States also have strong coordination with Federal Ministry of Environment and NESREA. 	<p>isolated ministries performing isolated roles related to social concerns. See Chapter 4.</p> <ul style="list-style-type: none"> ▫ There is no requirement for consulting with local communities or vulnerable people in EIA process. ▫ The capacity of the ministry and responsible agency to monitor and enforce environmental assessments is weak. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫ There are weak infrastructural and human resources capacities in delivering a robust ESIA process at the State level ▫ The State environment ministries have weak capacities and mirror gaps in the federal environmental regulation and laws ▫ The corresponding ministries to E&S thematic areas at the state level do not interface well with the Ministry of Education and Health. 	<p>There is a need to strengthen the E&S management capacities of the Federal Government in terms of management of</p> <ul style="list-style-type: none"> ▫ There is a need to strengthen the E&S management capacities if the states involved in terms of OHS, and provision of adequate skilled human resources to tackle E&S issues especially at the agencies, SUBEB & States/SPHCDA
--	--	---	---

Core Principle 2: Natural Habitats and Physical Cultural Resources

Table 5.2: Assessment Core Principle 2: Natural Habitats and Physical Cultural Resources

<p>Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.</p>
<p>Bank Directive for Program-for-Results Financing: As relevant, the program to be supported:</p> <ul style="list-style-type: none">▪ Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas.▪ Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities.▪ Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects
<p>Applicability: YES / <u>NO</u></p> <p>It is not expected that the Program will have any impact on natural habitats and physical cultural resources since it will not involve any new construction but possible rehabilitation of existing facilities.</p>

Core Principle 3: Public and Worker Safety

Table 5.3: Assessment Core Principle 3: Public and Worker Safety

<p><i>Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</i></p>			
<p>Bank Directive for Program-for-Results Financing:</p> <ul style="list-style-type: none"> ▪ Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed. ▪ Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions. ▪ Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events. 			
<p>Applicability: YES / NO</p> <p>It is expected that the Program will have impact on public and worker safety since it may involve rehabilitation of education and health infrastructure through strengthened predictability and timeliness of federal funding for basic education and primary health care in DLI1, enhanced efficiency and equity of UBEC financing of basic education in DLI2 and strengthened state budget planning and execution for basic education and primary health care in DLI 3.</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 1: strengthened predictability and timeliness of federal funding for basic education and primary health care</p> <p>DLI2: enhanced efficiency and equity of UBEC financing of basic education</p> <p>DLI3: strengthened state budget planning and execution for basic education and primary health care</p>	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ The legal/regulatory system of the country includes provisions for protecting worker, community and public safety. Some of these include, Labour Act of 2004, the Trade Union Amended Act of 2005, and the Employees Compensation Act of 2010. See Table III.5 ▫ NESREA has regulations to protect the public from hazardous chemicals, pesticides, and agrochemicals (National Environmental (Hazardous Chemicals and Pesticides) Regulations, S.I. No 65, 2014). ▫ The country also has some legal statutes 	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ The national EIA system does not comprehensively encompass aspects of public and worker safety. ▫ There is limited awareness by the general public, especially farmers, on public health and safety issues, particularly in relation to exposure to hazardous materials, fertilizers and pesticide handling and safety precautions. ▫ Lack of awareness of relevant authorities' staff to appreciate the need to ensure occupational health and 	<ul style="list-style-type: none"> ▫ The Federal Ministry of Environment should work towards improving the EIA system to incorporate important aspects lacking in the system, for example, issues relating to public and workers' safety and broader ESHS. Meanwhile, they should ensure that EIA reports submitted for review cover social issues especially relating to public and worker safety. ▫ States and Federal Ministry of Environment, States and Federal Ministry of Labour and States and Federal Ministry of Health and

	<p>and provisions to protect workers. Some of these include, Labour Act of 2004, the Trade Union Amended Act of 2005, and the Employees Compensation Act of 2010.</p> <ul style="list-style-type: none"> ▫ The federal government has the Ministry of Labor and their responsibilities include the protection of the rights of workers. ▫ The Federal Child’s Right Act (CRA) (2003) codifies the rights of children in Nigeria. It has penalties on the use of child labour ▫ The Nigerian Labor Law requires compliance with all national and international labor laws on occupational health and safety. The law requires routine inspection of workplaces, accident investigation, preparation of safety and health regulations, code of practice, guidelines and standards for various operations, processes and hazards. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫ Most state governments also have Ministries of Labor and these ministries also work to protect the rights of workers at the state level. ▫ Some of the states have standalone laws and regulations to protect the rights of children and workers, e.g. Plateau State Child’s Right Law 2005 was gazette in the state in 2017. ▫ 	<p>safety. The FMH and FME have little experience in OHS in a project environment.</p> <ul style="list-style-type: none"> ▫The enforcement of national labor laws is weak. ▫The national EA Department of the FME_{env} and NESREA have not comprehensively incorporated OHS management into civil works. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫Some States lack OHS guidelines and procedures to be adopted by contractors, firms (especially MSEs), employers of labour and workers in most of the States ▫Lack of awareness of relevant authorities’ staff to appreciate the need to ensure occupational health and safety. ▫There is limited awareness and lack of interest by the general public, on public health and safety issues, ▫Inadequate awareness of relevant authorities’ staff to appreciate the need to ensure OHS. 	<p>Education should collaborate and build the capacity of the leaders in the different institutions in the sector in order for them to become knowledgeable on issues relating to occupational health and hazard and how to deal prevent and deal with it.</p> <ul style="list-style-type: none"> ▫ State governments should ensure that government and employers of labour in the state enroll or cover their workers under the Workers Compensation Insurance. ▫ Provide on-site training to workers and laborers that will be involved in rehabilitation and upgrading work so that they will be familiar with OHS issues at their workplace. ▫ Provide training supply chain laborers/employers ▫ State governments should ensure that contractors, and other employers of labour especially those involving rehabilitation, health work, sanitation and waste management provide personal protective equipment for their workers. ▫ Ensure that all workers engaged under medical waste collection are provided with a relevant personal protective and safety equipment. ▫ Put in place a Grievance redress mechanism to handle workers conflicts. ▫ State governments should ensure that first aid facilities are provided in schools.
--	---	---	--

Core Principle 4: Land Acquisition

Table 5.4: Assessment Core Principle 4: Land Acquisition

<i>Bank Policy for Program-for-Results Financing: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.</i>
<p>Bank Directive for Program-for-Results Financing: As relevant, the program to be supported:</p> <ul style="list-style-type: none">▪ Avoids or minimizes land acquisition and related adverse impacts;▪ Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy;▪ Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access;▪ Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and▪ Restores or replaces public infrastructure and community services that may be adversely affected.
<p>Applicability: YES / NO</p> <p>The Program does not involve any form of land acquisition; thus, this core principle is not applicable. .</p>

Core Principle 5: Social Considerations - Indigenous Peoples and Vulnerable Groups

Table 5.5: Assessment Core Principle 5: Social Considerations - Indigenous Peoples and Vulnerable Groups

<p>Bank Policy for Program-for-Results Financing: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.</p>			
<p>Bank Directive for Program-for-Results Financing:</p> <ul style="list-style-type: none"> • Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program. • Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples. • Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits. 			
<p>Applicability: YES / NO</p> <p>It is expected that vulnerable people may be impacted through discrimination based on gender and disability, ethnic bias, complaints biased given that the Program will involve recruitment of education and health workers to reduce the gap in the need of teachers and health workers and in reducing absenteeism of teachers and health workers. Note that there are no groups in Nigeria that meet the World Bank's criteria for Indigenous Peoples. However, we followed the third point on Bank Directive for indigenous peoples and vulnerable groups to look at the systems that address the needs of groups vulnerable to hardships, including women, youths and people with disabilities. The applicability in terms of specific DLIs is indicated below.</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 7: Reduced staffing gap and more equitable deployment for basic education teachers and primary health care workers.</p> <p>DLI8: Reduced absenteeism of teachers and health workers</p>	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ Chapter IV of the Nigerian Constitution contains a variety of fundamental rights set out in Sections 33 - 44. of particular relevance is Section 42, which prohibits discrimination on the grounds of ethnic origin, sex (gender), religion, or linguistic affiliation. ▫ There is a Federal Ministry of Women Affairs and Social Development that deals with all gender related issues especially as it concerns the vulnerable especially women youths and People living with Disabilities (PWDs). They have a unit that deals with GBV and discrimination. 	<p>FFEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ There is a serious lack of trust in government and government ministries and agencies responsible for effective communication and engaging with the people, for example, the National Orientation Agency, Federal Ministry of Information and Culture and the Federal Ministries of Women Affairs and Social Development lack the requisite capacity and trust to build social contract. ▫ There is lack of information and weak knowledge of the public especially vulnerable groups regarding the issues relating to the economy, the need for effective tax system and payment of tax and the benefits of petroleum 	<ul style="list-style-type: none"> ▫ Deliberate efforts to strengthen multi-agency coordination e.g. between the National Orientation Agency, Federal Ministry of Information and Culture and the Federal Ministries of Women Affairs and Social Development to facilitate effective communication of government policies to the citizens, build trust in government and to strengthen the social contract, such as actions to tackle corruption and improve the delivery of services. Although these agencies are not directly involved in the implementation of HOPE. ▫ There is also a need to strengthen the capacities of the technical staff of these agencies to enhance communication of

	<ul style="list-style-type: none"> ▫ The Federal Ministry of Information and Culture has some institutions and agencies under it, for example, Radio Nigeria, Nigeria Television Authority and the National Orientation Agency that are responsible for communicating government programs and building trust with citizens. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫ Also, most state governments have Ministry of Women Affairs/Gender Affairs and Social Development. These ministries help to address the issues of GBV and discriminations of vulnerable people. Specifically, the Law in Ekiti State provides welfare package (cash/in-kind) to the elderly. ▫ Many States have robust legal framework for Gender considerations, youths' affairs and social exclusions and discrimination. ▫ Many states have laws and frameworks in dealing with violence and discrimination while some states, in addition, some have response teams to deal with GBV for example Kaduna State GBV Response Team. ▫ Few States have adopted the Violence against persons Law, e.g Kaduna State (adopted in 2018) and Ekiti State (adopted in 2019) 	<p>subsidy removal.</p> <ul style="list-style-type: none"> ▫ There is weak of capacity in Ministries of Women Affairs and Social Development to tackle the issues of GBV and other issues relating to gender and youths ▫ There is no coordinated strategy for implementing a broad social inclusion agenda across public services in Nigeria. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫ Many States are yet to adopt the Violence Against Persons (Prohibition) Law. ▫ Many states do not have adequate framework and institutional arrangement for combating GBV or prosecuting and punishing those involved in GBV thus offenders often do not get punished. ▫ Many of the states do not have policy to ensure inclusion of minority/ ethnic groups at local level or the extreme poor in programs ▫ Also, many of the States do not have gender policy or guidelines for dealing with vulnerable people and PWDs to ensure that they are not treated with contempt and partiality ▫ 	<p>government programs and build trust with the citizens.</p> <ul style="list-style-type: none"> ▫ States without Gender Policy should set in motion the process of developing their gender policy which will contain guidelines and processes of preventing discrimination against vulnerable groups and PWDs. ▫ States without a gender-based violence response team should quickly set up Domestic and Gender-based (Sexual) Violence Response Team (DSVRT) to for quick response to issues of GBV in the states. ▫ Sates should carryout regular enlightenment programs for the public and capacity building programs for staff of gender/women ministries. ▫ The Program implementing agencies should ensure that there is not discrimination ion recruitment of teachers and health work and also put in place an effective GRM to enasure that peoples' complaints especially regarding recruitment are addressed effectively. ▫
--	---	---	--

Core Principle 6: Social Conflict

Table 5.6: Assessment Core Principle 6: Social Conflict

<p>Bank Policy for Program-for-Results Financing: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.</p>			
<ul style="list-style-type: none"> Bank Directive for Program-for-Results Financing: Considers conflict risks, including distributional equity and cultural sensitivities. 			
<p>Applicability: YES / No</p> <p>Armed conflicts are not expected during the implementation of the Program, however, there could be disagreements, complaints, demonstrations and grievances may arise during the Program implementation due to lopsided or biased recruitment and deployment of teachers and health workers and bias and discrimination in checking absenteeism of teachers and health workers.</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 7: Reduced staffing gap and more equitable deployment for basic education teachers and primary health care workers.</p> <p>DLI8: Reduced absenteeism of teachers and health workers.</p>	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ The constitution of the Federal Republic of Nigeria 1999 (as amended) provides in Section 17 (3) (g) that “the State shall direct its policy towards ensuring that provision is made for public assistance in deserving cases, or other conditions of need. ▫ Federal throughout the country with well-trained police and security forces who maintain the rule of law and also provides security against bandits and other forms of violent crimes and attacks. ▫ The military also provides security against armed insurgency and terrorism. ▫ There is also a justice system with courts where people can seek redress. ▫ The federal government also has the public complaints commission where people can make complaints regarding administrative injustices. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫ State presence is strong throughout the country with well-trained police and security 	<p>FEDERAL LEVEL</p> <ul style="list-style-type: none"> ▫ Lack of a Grievance Redress Mechanism (GRM) for the poor and vulnerable. Although Nigeria has a justice system with courts where people can seek justice, poor and vulnerable people do not have the capacity to seek justice in courts. ▫ The available GRM are weak and ad-hoc and not properly institutionalized. This is a need to ensure that people’s grievances are properly redressed even when there is need to seek further redress if the individual is not satisfied with the outcome of existing arrangements. <p>STATE LEVEL</p> <ul style="list-style-type: none"> ▫ Most of the states do not have a GRM where poor and vulnerable can make complaints and get redress. ▫ Although some states have ways of settling grievances, these 	<ul style="list-style-type: none"> ▫ Strengthened stakeholder engagement and grievance redress mechanisms and increased transparency to provide information and communication avenues for complaints and their resolutions. ▫ Build social contract with the people to facilitate success of proposed reforms. ▫ States without a framework to provide free legal services/legal aid and advice to the citizens should work towards providing that. ▫ States without an agency responsible for grievance redress and peaceful resolution of disputes should make effort to provide one. ▫ States should strengthen their GRM to facilitate resolution of conflicts.

	<p>forces who maintain the rule of law and also provides security against bandits and during clashes between farmers and herders. There is also a justice system with courts where people can seek redress.</p> <ul style="list-style-type: none"> ▫ Some state government also have different institutional arrangements, e.g. Multidoor Courthouse Law and Public defender Law in Delta State. 	<p>arrangements are ad-hoc and needs to be properly institutionalized.</p> <ul style="list-style-type: none"> ▫ Available GRM frameworks are not formalized and not well recognized. ▫ Most of the states do not have GRM mechanisms where poor and vulnerable can make complaints and get redress. 	
--	---	---	--

SECTION VI: PROGRAM ACTION PLAN (PAP) AND RECOMMENDATIONS

81. This section recommends measures that will be taken to strengthen system performance in line with the gaps and risks identified in section iv of the system assessment section to ensure that the Program interventions are aligned with the Core Principles 1, 3, 5 and 6 of Bank Policy for Program-for-Results financing as stated below:

- Core Principle 1: General Principle of Environmental and Social Management:
- Core Principle 3: Public and Worker Safety
- Core Principle 5: Social Considerations - Indigenous Peoples and Vulnerable Groups:
- Core Principle 6: Social Conflict

82. These actions may be further refined and adjusted during the consultation process and the implementation of the Program.

6.1 Environmental Summary and Recommendations

83. Although Nigeria has a well-defined environmental system that is close to the core principle of environmental assessment, some gaps remain. For example, the monitoring of EIA implementation is weak, as there is no tracking system to monitor environmental and social risks and performance. At the State and local levels, there is a weak capacity to deliver a robust environmental assessment process. OHS framework is also lacking, especially in schools. There is equally weak monitoring and evaluation of environmental and social systems at the state level, and enforcement is weak.

84. Given the environmental impact of this project, some recommendations are made as follows:

- Strengthening the E&S capacity under the project is needed. To facilitate this, E&S specialists should be recruited for the Program.
- There is also a need to develop healthcare waste management strategies to facilitate the management of healthcare waste. The requirements for healthcare waste control should be included in the bidding document under HOPE PforR.
- There is need to build the capacities of implementing entities on the healthcare waste management strategies developed.
- There is a need to develop an environmental and social management strategy or manual for schools.
- There is a need to build the capacities of implementing entities on environmental social health and safety (ESHS) in schools.

6.2 Social Summary and Recommendations

85. Given the identified social issues and weaknesses in the federal system, the following recommendations are made:

- Ensure that the recruitment of teachers and health workers to reduce staffing gap and application of mechanisms to reduce absenteeism are carried out transparently to avoid ethnic or religious bias. Also, there is a need to ensure

gender inclusion in the recruitment, deployment and management of teachers and health personnel.

- Ensure a select number of teachers are trained in environmental management and safety in the school environment.
- Establish a robust grievance redress mechanism specific to the Program to ensure that complaints from different stakeholders are well addressed.
- Strengthen provisions in the Code of Conduct (CoC) on gender-based violence (GBV) prevention and response, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment.
- Promote inclusive practices to accommodate students with disabilities through teacher training and inclusion in the upgrade CoC.

86. Following the recommendations, the breakdown of actions to be included in the Program Action Plan (PAP) with indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions are detailed in the Table 6.1 below.

Table 6.1: Program Action Plan (PAP)

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
1	Hire qualified Environmental and Social Officers and provide capacity building/system strengthen program to strengthen their skills	No later than 3 months after effectiveness (will be reported during the first mission ISR)	FMFBNP and National Program Coordinating Unit (NPCU)	Assist the E&S PAP implementation official to execute the above responsibilities.
2	Develop health care waste management strategies for managing healthcare waste	Within one year of effectiveness or before the first bidding document for equipment procurement, whichever is earlier.	Federal and state Ministry of Health and relevant agency	Healthcare waste management strategy document.
3.	Conduct capacity building training on healthcare waste management	Within one year of effectiveness after the healthcare waste management strategies are developed	FMFBNP, Federal and state Ministries of Health, Education, and relevant agency	No. of participants that participate in the training

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
4	Develop environmental and social management and safety strategy/manual for schools	Within one year of effectiveness or before the first bidding document for equipment procurement, whichever is earlier	Federal and state Ministry of Education and relevant agency	School environmental and social management and safety strategy/manual
5	Conduct capacity building training on environmental social health and safety (ESHS) in schools.	Within one year of effectiveness after the ESHS manual is developed	FMBEP, Federal and state Ministries of Health, Education and relevant agency	Number of participants that participate in the training
6	Strengthen provisions in the Code of Conduct (CoC) on gender-based violence (GBV) prevention and response, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment.	Within two years of effectiveness	Federal and state Ministry of Education and relevant agency	CoC updated to include provisions on GBV prevention and response
7	Promote inclusive practices to accommodate students with disabilities through teacher training and inclusion in the upgrade CoC.	Within two years of effectiveness	Federal and state Ministry of Education and relevant agency	CoC updated.
8	Develop a GRM specific to the Program	Within one year of effectiveness	Federal and state Ministry of Education and Health and relevant agency	Copies of GRM outlining details of implementation

SECTION VII. SUPPORTING ANNEXES AND REFERENCE DOCUMENTS

Annex 1: Applicability of Core Environmental and Social Principles (CP) to the HOPE Program Result Area and Disbursement Linked Indicators (DLIs)

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public Worker Safety &	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
RA 1: Increasing the availability and effectiveness of financing for basic education and primary health care service <i>delivery</i> .	DLI: 1 Enhanced access and equity of UBEC financing of basic education	Applicable, as there are rehabilitation works supported by the DLI given increased state discretion on the use of funds for state priority needs.	Not Applicable as there are no physical works supported by the DLI	Applicable as there are rehabilitation works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable	Not Applicable
	DLI2.: Strengthened state budget planning and execution for basic education and primary health care	Applicable, as there are rehabilitation works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Applicable as there are rehabilitation works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable	Not Applicable
RA 2: Enhanced transparency and accountability of financing for basic	DLI 3: Strengthened accountability and transparency of funding for basic	Not Applicable as there are no physical works	Not Applicable as there are no physical	Not Applicable as there are no physical	Not Applicable as there are no physical	Not Applicable	Not Applicable

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public Worker Safety &	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
education and primary health.	education and primary health care.	supported by the DLI	works supported by the DLI	works supported by the DLI	works supported by the DLI		
	DLI4: Strengthened accountability of funding for basic education and primary health	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable	Not Applicable
RA 3: Improved recruitment, deployment and management of teachers and primary healthcare workers	DLI 5: Increased number of teachers and primary health care workers deployed	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Applicable as there could be discrimination and bias in recruitment and deployment of teachers and health workers to reduce staffing gap and which could	Social conflict as envisaged by ESSA especially regarding armed conflict is not applicable. However, there could be disagreement, minor demonstrations and grievances due to lopsided recruitment and deployment of teachers.

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public Worker Safety &	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
						negatively impact vulnerable people.	
	DLI6: Improved payroll and performance management for teachers and health workers.	Applicable due to environmental and social risks that may accompany increased procurement of education and health facilities.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable	Not Applicable

Annex 2: Key Environmental & Social Risks and Benefits Associated with Program Activities

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
1: Increasing the availability and effectiveness of financing for basic education and primary health care service delivery	1. Enhance access and equity of UBEC Financing of for basic education	There could be enhanced curriculum and increase in environmental education due to stability if funding of basic education.	Achieving this DLI may result in increased spending in rehabilitation of primary health care and education facilities. Thus, environmental risks associated with rehabilitation, such as solid waste, noise, and air pollution, will impact the environment.	Achieving this DLI will lead to increased and better use of funds for basic education and primary health care resulting in enhanced health outcomes, enhanced literacy and numeracy among school children, reduced infant and maternal mortality rates, increased life expectancy, reduced number of out-of-school children (OOSC), enhanced performance of pupils and students in basic education.	Achieving this DLI may result in rehabilitation works which will lead to influx of workers to the communities where rehabilitation work will occur. could lead to cases of sexual abuse and other vices, for example, drug abuse.
	2. Strengthened	There could be enhanced	Achieving this DLI may result in	Increased utilization of	Achieving this DLI may result in

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
	state budget planning and execution for basic education and primary health care	curriculum and increase in environmental education due to stability if funding of basic education.	increased spending in rehabilitation of primary health care and education facilities. Thus, environmental risks associated with rehabilitation, such as solid waste, noise, and air pollution, will impact the environment.	funding for basic education and health care will facilitate the acquisition of education and health facilities and enhanced performance of the sectors. Benefits include enhanced health outcomes, enhanced literacy and numeracy among school children, reduced infant and maternal mortality rates, increased life expectancy, reduced number of out-of-school children (OOSC), enhanced performance of pupils and students in basic education	rehabilitation works which will lead to influx of workers to the communities where rehabilitation work will occur. could lead to cases of sexual abuse and other vices, for example, drug abuse.

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
RA 2: Enhance transparency and accountability for basic education and primary health financing.	3. Strengthened accountability and transparency of funding for basic education and primary health	Negligible	Negligible	Achieving this DLI will ensure that funds meant for education and health are not diverted to other uses thus ensuring that available funds are well utilized. It will foster greater service delivery and public confidence in primary health care and basic education. Benefits include enhanced health outcomes, enhanced literacy and numeracy among school children, reduced infant and maternal mortality rates, increased life expectancy,	Negligible

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				reduced number of out-of-school children (OOSC), enhanced performance of pupils and students in basic education	
	DLI 4: Strengthened accountability of funding for basic education and primary health	Negligible	Negligible	The same as above	Negligible
Result Area 3: Improve recruitment, deployment, and management of teachers and primary health workers	DLI 5: Increased number of teachers and primary health care workers deployed	Negligible	Negligible	Achieving this DLI will guarantee that enough personnel (teachers and health workers) are available in primary schools and health centres, especially in rural communities, many of which lack teachers and health workers. This will ensure that education and health services are brought closer to the people, thus facilitating the	There could be potential discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of women in the recruitment, deployment, and performance management of teachers and primary health workers

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				reduction in maternal and child mortality rates, reduced OOSC and improved performance by pupils and students under basic education	
	DLI6: Improved payroll and performance management for teachers and health workers.	Negligible		Achieving this DLI will help eliminate the incidence of ghost workers and absenteeism enhance the outcome of basic education and primary healthcare.	There could be potential discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of women in implementing schemes for reducing absenteeism of teachers and health care workers.

Annex 3: Discussion Questions and Responses from Representatives of States in Southern Nigeria

Questions and Responses Regarding Result Areas 1 and 2

Question	Response
State	Response
Osun	We have a robust procurement law that incorporates provisions for tender bidding, ensuring environmental and social issues are addressed. We conduct all procurement activities within the boundaries of this law; they do not operate outside of it. They strictly adhere to the details outlined in the procurement process.
Rivers	The River State Bureau of Public Procurement (BoPP) oversees all procurement activities, particularly those related to construction and civil works. The BoPP must oversee all such projects. Additionally, they handle environmental impact assessments with dedicated consultants for this purpose. Within the ministry, there are separate units for project management and procurement. Collaboration between the ministry and the BoPP ensures effective oversight and coordination of procurement processes.
Anambra	Anambra's Bureau of Public Procurement (BoPP) handle all procurement issues. The Environmental and Social (E&S) officers ensure that all procurement activities incorporate E&S concerns. The BoPP centrally manages procurement processes across the state.
Enugu	Established both the BoPP and the due process unit. This agency and the unit ensures that procurements adhere to the laws and regulations.
Taraba	Taraba has a BoPP and a law that governs procurement issues.
Ogun	

Question	Response
State	Response
Osun	We have the ministry of environment and environmental officers deployed to Ministries Department and Agency (MDAs). For the social issues, we have the ministry of women and children affairs responsible for social issues. There is no specific department. The state has key in various P4R programs, which require them to perform various E&S studies. When they have a project like that, what we do is to check around to ensure compliance with the program standard. A particular department responsible for a program create an interdepartmental or intergovernmental ministerial committee to ensure E&S issues are taken care of before the project is sited in a particular location, e.g., the provision of drinkable water to a certain community that is done under CSDP. They have a way of mitigating handling E&S issues before starting the project. The results and experience gathered under the ongoing P4R program in the state can be domesticated in the HOPE program.
Rivers	The E&S public health department houses environmental officers. There are project units that deal with construction work. When projects involve

	environmental issues, they conduct impact assessments. They work in collaboration with the Ministry of Environment. In the Ministry of Women Affairs, there is a desk officer in charge of sexual harassment and NGO issues.
Anambra	E&S issues are handled centrally by the Ministry of Environment and Women Affairs, and for specific programs, E&S officers are seconded to different projects to support.
Enugu	The Ministry of Environment responsible for environmental issues. The emergency management unit deals with shock issues. Ministry of Gender deals with aspect of social issues.
Taraba	There is a Ministry of Environment and a Taraba State Environmental Protection Agency. On the social side, there is also the ministry of social justice, orientation, and state emergencies.
Ogun	Ministries collaborate with the Ministry of Environment and emergency management response agencies. On social issues, the Ministry of Women Affairs and the Ministry of Justice are responsible.

Question	Do you have experience preparing Environmental and Social Management Plans (ESMP) and Environmental and Social Impact Assessment (ESIA)? If yes, describe how it was carried out in one of the ministry's projects.
State	Response
Osun	Yes, the World Bank implements programs and interventions in the state and collaborates with consultants to develop the necessary instruments. Oversee all agencies that handle intervention in the ministry of budget and planning but need the project manual.
Rivers	Yes, they have a project unit attached to the Ministry of Health. The project unit engages consultants who work alongside with architects, engineers and surveyor to assist with preparations. Regarding the P4R initiative, they focus solely on innovation and do not undertake any construction projects
Anambra	They work with the WB during program inception, and the plans are developed. They got a consultant who liaised with an on-ground E&S officer to develop an E&S impact assessment for a project.
Enugu	Has robust social protection bodies developed by an assembly of concerned stakeholders for the state that passed through concerned areas for social issues and has a legal framework. The system incorporates gender-specific safeguards to protect vulnerable groups. Environment issues are within the purview of the Ministry of Environment..
Taraba	Ministry of Environment
Ogun	We developed social issues plan in collaboration with the Women Advocate Research Documentation Center and other government agencies, including the Ogun State Primary Healthcare Board. The desk officer, who was part of the training, is involved. Other collaboration plans with NGOs may exist. Though the respondent was not well-versed in the environmental plan, I'll contact the Ministry of Environment for details.

Question	Do you have an environmental and social specialist in the agencies UBEC, NPHCDA, and NHIA (including for state counterparts)?
State	Response

Osun	Yes, the Ministry of Environment is responsible for deploying officers to different ministries as needed. They will provide confirmation for UBEC and NHIA.
Rivers	Yes, they have handled E&S issues under primary health care at the health centers and community level. This includes inspecting waste disposal and potable water in the community, ensuring ventilation and sanitation, and verifying that individuals have the necessary approval to carry food. Developed a gender-based violence program in four of their facilities, where survivors receive free care. Recently, I collaborated with a UN consultant on a sensitization on gender integration in primary health agencies.
Anambra	UBEC, SPHCDA, Health insurance agency have in house E&S specialist in the agency
Enugu	There is no specific office for E&S in their ministries, but the specialists are in the Ministry of Environment, Gender, and Socio. The state is synergistic, with the relevant ministry providing support.
Taraba	The specialists are domiciled at the Ministry of Environment and TSEPA. There is a specialist in UBEC, and for primary health care, it is not certain..
Ogun	A specialist from the Ogun State Waste Management Agency is collaborating with them in the ministry.

Question	Do you have waste management procedures under your programs (especially for managing hospital waste and school waste)?
State	Response
Osun	Yes, there is hospital waste; for the school, waste is well managed in the state that prohibits people from throwing waste anyhow. Have designated reserved areas for depositing waste while seeking global, evaquet government facilities segmentation at the generation of the waste.
Rivers	Has a robust medical waste management system. Waste is collected at a central point. The state health insurance scheme has a medical waste department that takes care of the waste. The Ministry of Environment deals with school waste.
Anambra	Has a robust waste management law with procedures for disposing different types of waste
Enugu	Enugu state waste management agency responsible for collection and disposal of all kinds of waste. Hospitals, communities are sensitized on the disposal of waste at a central point for final disposal by EGSWAMA
Taraba	Has Ministry of waste management and resource innovation responsible for waste management and has a waste management procedure used in health facilities for waste disposal
Ogun	The state has accredited PSP for collection and disposal for schools and health facilities. Health care waste is segregated at the point collection in different bags

Question	How do you handle the disposal of electronic waste and hazardous waste material?
State	Response

Osun	Hazardous waste is grouped into infectious, highly infectious, and sharps and is disposed of in three ways. 1. burn and bury; 2. incinerate; 3. link with a local government waste management agency to incinerate at the final disposal site. Sharps are placed in the sharp box to be disposed of by the local government. The state has a contract with an organization (a private company) that is responsible for medical waste collection and disposal. Electronic waste is managed by a waste management agency.
Rivers	In the health system, the state has a proper waste management system under the director of medical services. There are colour coded waste containers for segregating and incinerating sharps and hazardous medical wastes. The Ministry of Environment take care of other waste.
Anambra	Waste management agencies under the Ministry of Environment have detailed procedures for managing waste.
Enugu	Enugu State Waste Management authority takes care of the disposal after collection. There has been sensitization on segregation of biodegradable and non-biodegradable waste
Taraba	The Ministry of Waste Management and Resource Innovation take care of waste materials in health facilities by burning them in incinerators, and some are collected by individuals for recycling.
Ogun	Hazardous and electronic waste is handled by the Ministry of Environment and electronic waste is handled by OG Waste Management Agency

Question	What is the process for social inclusion in the education and health sector? How are stakeholders and communities represented and consulted before development takes place?
State	Response
Osun	In Osun State, a bottom-up approach is used in the budget process, reflecting a comprehensive development plan created by citizens across all 16 sectors. The state implements a gender equity and social inclusion policy to address the needs of all individuals. Parent-Teacher Associations (PTAs) facilitate community involvement by collaborating with religious, community, and traditional leaders to address school absenteeism, with at least one healthcare facility within a 15-minute drive from every home. Additionally, citizen engagement occurs annually to gather input before finalizing the fiscal year's budget.
Rivers	The PHCs have a ward development committee that aims to include community members. The PHCs utilize social behavioral change committees to guarantee inclusivity, while GBV groups expedite decision-making processes. Has desk officers in different ministries on GBVs with the inclusion of CBOs in all programs.
Anambra	Has the 4th arm of government, the closest to the people. Has community demand embedded into the state budget. Free education and free maternal care are strategies to create more inclusivity in the education and health sectors
Enugu	Has an inclusive education policy. To ensure implementation, the government has decided to build one smart-green school to ensure qualitative basic

	education is served to all groups, irrespective of social strata. For the health sector, the health provision is for levels that reach all and sundry.
Taraba	There is free education at the basic education level. There are state-owned institutions that have reduced by 50% at the tertiary level. Certain categories of diseases are treated freely in government hospitals. 1–5 children receive treatment free for some services. SBMC runs the schools and is part of the systems to get their input into the management of schools. Some CDDs come up with their project, collate it at the local government level, and forward it to the state for inclusion in the yearly budget..
Ogun	Periodic engagement with traditional owners, community development associations, and media to ensure social inclusion. There are ongoing health insurance plans. For education. The minimum budget and planning coordinate other agencies for effective management. A town hall meeting with the people at the grassroots for suggestions and needs of each division is held at the meeting. The governor chairs the meeting with excos members and thereafter discusses financial implications and passes a bill for financing and implementation.

Question	To what extent are school premises kept clean, safe and green?
State	Response
Osun	90% safe, secured, clean and well managed
Rivers	Very clean schools with responsibility of Ministry of education and regulatory agencies who inspects regularly
Anambra	Our schools are very safe and clean
Enugu	Has rolled out integrated smart green school translated into 60 units of green schools
Taraba	
Ogun	

Question	Are there dedicated budget for environmental sanitation and hygiene in schools?
State	Response
Osun	Yes, has budget provision passed by the House of Assembly
Rivers	Not sure
Anambra	Yes
Enugu	Yes
Taraba	
Ogun	

Question	Do schools have enough supply of clean and potable water?
State	Response
Osun	Yes larger percentage of the schools have but not all of them
Rivers	Yes most schools have clean and portable drinking water
Anambra	Yes most schools have clean and portable drinking water

Enugu	The current govt is targeting providing clean water in all schools for the green schools
Taraba	
Ogun	Appropriation is done in respect of education facilities in the state

Question	How are accidents, incidents, injuries handled in schools?
State	Response
Osun	There is first aid box to take care of injuries in nearly all schools, then refer for injuries beyond first aid to primary health care. The state has a state emergency medical agency called an ambulance system
Rivers	Not sure but there should be a protocol for that
Anambra	Has sick bays and first aid units and cases are escalated to PHCs where required
Enugu	Schools are encouraged to have a medical system (first aid system) where emergency cases are handled and referred to PHCs for further management
Taraba	
Ogun	Schools have sick bays and nurses and referral to PHCs when need be

Question	What is the system of handling occupational health and safety (OHS) during civil works in the health and education sectors?
State	Response
Osun	Has a mobile ambulance to take victims for medical care. Licensed consultants handle the civil work. There is an entrance and exit place to ensure people can be evacuated in terms of emergency.
Rivers	Has health and safety protocols that entail how safety measures are carried out and licensed safety officers at construction sites.
Anambra	No system is in place yet.
Enugu	Measures start from prevention as construction sites are screened off and learners prevented from getting to hazardous areas
Taraba	
Ogun	

Question	Are minors allowed to work at construction sites for schools and hospitals?
State	Response
Osun	No
Rivers	No
Anambra	
Enugu	Has a child rights act, which prohibits the engagement of minors
Taraba	
Ogun	No

Question	What system exist in preventing environmental degradation in the health and education sector (at construction and operational stages)?
State	Response
Osun	Proper waste disposal to avoid environmental pollution

Rivers	Has E&S laws that protects the environment and people of the state which are abide by to guide environmental degradation and waste management and prevention of use of certain chemical in construction sites
Anambra	
Enugu	All construction sites are cordoned off to prevent fall out from the construction and debris cleared after the construction and disposed off
Taraba	
Ogun	

Question	What source(s) of energy are used in schools and health facilities?
State	Response
Osun	3 sources of energy used in Osun state 1. National grid-electricity, 2. Generators and 3. some use solar energy. Some don't have and source of energy. Looking for partnership to install solar energy in schools
Rivers	3 sources of energy used in the state 1. National grid-electricity, 2. Generators and 3. some use solar energy. Some don't have and source of energy. Looking for partnership to install solar energy in schools
Anambra	In Anambra State, EEDC, Gen, and Solar, exist in different facilities.
Enugu	Electricity in major. There is challenges in provision of secure powers, alternate is generators. Looking for partnership to install solar energy in schools
Taraba	
Ogun	Most schools are connected to national grid, alternate is generator and solar powered electricity

Questions and Responses Regarding Result Area 3

Question	How do you handle complaints and grievances? Do you have a framework, procedure, legislation or regulation for redressing grievances? Do the Ministry and Agencies have a grievance redress mechanism?
State	Response
Osun	Has a disciplinary committee headed by a senior teacher who listens to the complaints of the students. There are also suggestion boxes where grievances are dropped. The committee makes a decision on the grievances.
Rivers	Has administrative protocols that addresses different types of grievances in the schools and work place for fair hearing and justice is served
Anambra	Has GRM framework in MDA which is a bottom-top approach
Enugu	Depending on the aggrieved person, for a learner, it starts from class management and escalated to the school management and further to the system management. For teachers, it goes to the management of the institution and scaled up to the management of the system until it is resolved
Taraba	
Ogun	Teacher can register their complaint through school head to zonal level and district and addressed

Question	Can marginalized people or those who feel they were not appropriately treated have a procedure to report their grievance? Do you have a mechanism
----------	---

	to address the issues to the satisfaction of the complainants? Please give an example of how you handled this in the past.
State	Response
Osun	Suggestion box is provided at the entrance for complains for those who complaints of marginalization. HIV patient was marginalized as no nurse wanted to attend but reported to the management and was treated
Rivers	Complaints can be addressed formally and informally but the complainant needs to lay the complaint
Anambra	
Enugu	Every class has a form master. If not addressed, it is scaled up to the principals, UBEC until resolved to the satisfaction of the complaint
Taraba	
Ogun	

Question	Do you have a gender policy? Have you experienced sexual harassment or exploitation in your ministry/agency? How do you handle issues relating to sexual harassment, sexual violence, and exploitation?
State	Response
Osun	Has a robust Gender equity and social inclusion policy. It is being looked into for review in line with the current reality now. Welcome partnership for the review of the policy. Not experienced SEA/SH in their ministry but the ministry of women affairs has measures in place
Rivers	Has a gender policy in place. The policy needs to be reviewed and more robust. A gender integration and sensitization workshop have bene carried out and a stakeholder engagement where key stakeholders from different gender/women groups on their perception in the gender narrative
Anambra	
Enugu	Has ministry of gender who partners with NGOs engaged in the protection of right of women and other vulnerable groups.
Taraba	
Ogun	Has a gender policy in place. Mainly handled by min of women affairs. In the school system, a committees investigate and takes necessary judgement

Question	Has there been any complaint about discrimination due to religion or gender in your programs?
State	Response
Osun	No
Rivers	Yes, complaints on non-inclusion, programs are mainly concentrated on women and children
Anambra	
Enugu	No complaints on religion but on gender, there may be but unreported and fewer
Taraba	
Ogun	No

Question	If there was, how did you handle it?
----------	--------------------------------------

State	Response
Osun	Nil
Rivers	Nil
Anambra	Nil
Enugu	Nil
Taraba	Nil
Ogun	Nil

Question	Response
Do you have a policy or regulation regarding gender discrimination or discrimination due to religion or tribe?	
State	Response
Osun	Has VAP law that focuses on discrimination being implemented by the ministry of women affairs
Rivers	Has a policy on all kinds of discrimination, but a need to review the policy which are currently obsolete
Anambra	
Enugu	Has min of gender and have social protection policy which requires partnership to review the policy to accommodate emerging issues.
Taraba	
Ogun	

Question	Response
Are Health and Safety Officers recruited and posted to Primary Health Care Centers?	
State	Response
Osun	Not yet
Rivers	No, but make use of health workers to act in that capacity who are trained
Anambra	
Enugu	Not sure
Taraba	
Ogun	

Question	Response
Are these officers trained on Health Care Waste Management?	
State	Response
Osun	Yes, most of the officers have capacity to manage health waste
Rivers	Yes have health workers trained on waste management who also undergo refresher training
Anambra	
Enugu	Not sure
Taraba	
Ogun	Not sure

Question	Response
Do teachers receive training on environmental health and safety?	
State	Response
Osun	Yes, they do
Rivers	Not sure
Anambra	

Enugu	Yes
Taraba	
Ogun	Yes, a department organizes a regular training on environmental health and safety. Collaborates with min of health for E&H training in regards to sanitation and immunization

Question	Do syllabuses contain topics on environmental health, safety or sustainability
State	Response
Osun	Yes, it does
Rivers	Yes, the syllabus contains HS
Anambra	
Enugu	Yes, the school syllabus contains EHS
Taraba	
Ogun	Yes, it does, graded into scheme of works across all level in primary and secondary

Annex 4: Discussion Questions and Responses from Representatives of States in Northern Nigeria

Questions and Responses Regarding Result Areas 1 and 2

Question	How do you handle safeguard issues (environmental and Social) in your procurement?
State	Response
Kwara	E&S is an important part of procurement. Procurement considers issues related to location, the project, and the socio-cultural needs of individual community members. We take into account the cost implications, procurement of materials, and other fundamental aspects of procurement policy. The state has a public procurement agency that deals with procurement issues.
Borno	
Nasarawa	We have a robust Nasarawa State Bureau of Public Procurement. Procurement is initiated in the state. The efficiency unit in the Ministry of Finance vets procurement and safeguards issues before procurement. In the absence of the safeguards office, the procurement will be discarded, and the attention of the officer will be called upon.

Question	Are there units or departments in the ministries responsible for environmental and social issues?
State	Response
Kwara	Yes, the Ministry of Environment and the Ministry of Social Development. These two ministries collaborate with the Kwara State procurement agency to identify the procurement issues of a specific unit, or MDA. Any MDA that wants to do procurement must do it in line with public procurement agencies, including the Ministry of Justice and the Ministry of Finance.
Borno	The Safeguard Unit under the Social Mobilization Unit has a desk officer in the Borno State Universal Basic Education Board (SUBEB), Ministry of Environment, and Ministry of Women Affairs and Social Development.
Nasarawa	The Ministry of Environment, the Ministry of Women Affairs, the Ministry of Humanities, and the and the Ministry of Health also have an environmental unit.

Question	Do you have experience preparing Environmental and Social Management Plans (ESMP) and Environmental and Social Impact Assessment (ESIA)? If yes, describe how it was carried out in one of the ministry's projects.
State	Response
Kwara	The Ministry of Environment and the Ministry of Social Development coordinate environmental issues in the state. Several projects under the Ministry of Health involve personnel in some of the safeguards issues.
Borno	The Ministry of Environment also has the Borno State Environmental Protection Agency, which handles environmental and social issues. We will leverage what has been done on the AGILE project.

Nasarawa	The Ministry of Environment has an agency under the ministry, which is the Environmental Protection Board, and the Ministry of Environment is saddled with this responsibility. NARUWASA, under water resources, handles the provision of water for communities and local communities. Ministry of Humanitarian Services.
----------	---

Question	Do you have an environmental and social specialist in the agencies UBEC, NPHCDA, and NHIA (including for state counterparts)?
State	Response
Kwara	Yes, they have an E&S seconded from the Ministry of Environment to the Kwara State Primary Care Development Agency (SPHCDA).
Borno	None from UBEC; a safeguard team is however available in the Ministry of Education, including GRM, GBV, and E&S specialists.
Nasarawa	There is no designated officer in the SPHCDA. There is an impact project, and there are designated E&S officers under the project domiciled in the agency.

Question	Do you have waste management procedures under your programs (especially for managing hospital waste and school waste)?
State	Response
Kwara	Health workers are trained on medical waste and its associated protocols. Incineration at the Ilorin Teaching Hospital is what they leverage at the moment, as the other two are not currently in use.
Borno	Have Safeguard team members well trained under WB projects and have school waste management in place, which they will leverage.
Nasarawa	A healthcare waste management system in the state came on board under the Nigerian state health investment project. Health care waste is segregated into their bin, and hazardous waste is disposed of in the FMC in Keffi, the state specialist hospital in Lagos, and the infectious disease specialist hospital. A focal person at SPHCDA is responsible for managing health care waste.

Question	How do you handle the disposal of electronic waste and hazardous waste material?
State	Response
Kwara	The general waste is well-managed, just like any other.
Borno	Training was held on how to handle hazardous waste. Electronic waste is kept in the store before final disposal.
Nasarawa	There is a unit in the Ministry of Environment, but he cannot be specific. There is a unit in the Department of Public Health for e-waste and a desk officer assigned to e-waste and management in the Department of Health.

Question	What is the process for social inclusion in the education and health sector? How are stakeholders and communities represented and consulted before development takes place?
State	Response
Kwara	In education, we carry out our survey to identify the stakeholders. Every program targets different stakeholders, including religious, political, and

	community leaders. Done through a mass campaign on social media, print and electronic media, and house-to-house advocacy to win the target group and have an overall inclusion Health and functional ward development committees are critical stakeholders consulted when critical activities are consulted. Have a function. GRM to get feedback and respond.
Borno	The school-based management committee comprises different stakeholders from the school and community and mobilizes the communities for implementation. Comes up with plans and implements them. SBMC involves ward heads and district heads who have influence in the community. Classes are also built to accommodate special needs.
Nasarawa	Health, GRM well-structured in the agencies at SPHCDA and the health agency. Chairman GM is involved in all programs at the agency.

Questions and Responses Regarding Result Area 3

Question	How do you handle complaints and grievances? Do you have a framework, procedure, legislation or regulation for redressing grievances? Do the Ministry and Agencies have a grievance redress mechanism?
State	Response
Kwara	Yes, GRM is functional in all 193 wards of the states, and there is a suggestion box in all wards. The social safeguard officer may resolve some complaints, and if cascaded, individuals from the ministry or community may handle them.
Borno	Yes, they have established GRM in the school communities. There are suggestion boxes, and there are telephone lines that can be called. There are GRCs in all communities. The secretary receives the complaint and calls for the GRC to sit down and resolve it with the aggrieved party. There is a framework in place.
Nasarawa	Yes, GRM is in SPHCDA and the state health insurance agency. The latter handles complaints about services provided by the agency. There are numbers available to all, and they address them. Quality control swings into action if it is escalated. QC also handles it if it is above the Local Government level at SPHCDA. A framework was adopted from the NSHIP project in their operation around services at the facility level. Each agency has a GRM, and most start from the lower level all the way up. For the health insurance scheme, each beneficiary has access to a phone number on their health card, which they can call to lodge their complaints.

Question	Can marginalized people or those who feel they were not appropriately treated have a procedure to report their grievance? Do you have a mechanism to address the issues to the satisfaction of the complainants? Please give an example of how you handled this in the past.
State	Response
Kwara	A team constitutes the GRC, with the ward chairman as head. Provision of micronutrient powder to children under 5, where some were excluded, was a result of fatigue from the community volunteers. GRM box and a GRM or line to be called

Borno	There is a suggestion box in the school committees where the GRC sits to deliberate on issues. E.g., renovation in one of the schools, and some classes do not have ramps, and the component lead was informed, who informed the SBMC, and the feedback on including ramps was communicated to the aggrieved person within a week.
Nasarawa	There is a client satisfaction survey conducted quarterly in the area of delayed services to gather information from marginalized people to address issues relating to them. This is a result of limited human resources.

Question	Do you have a gender policy? Have you experienced sexual harassment or exploitation in your ministry/agency? How do you handle issues relating to sexual harassment, sexual violence, and exploitation?
State	Response
Kwara	SEA/SH plan developed by the Kwara State Ministry of Health 50% of honorable commissioners are female. Rape and sexual harassment have been addressed in communities. SH and an assault referral center have been established where survivors can be referred, and there is a line for survivors to call. Ministry of Women Affairs handles the SEA/SH case. If measures to arrest perpetrators are taken and the survivors are taken to the Ministry of Social Development for custody, then the case is being handled.
Borno	In the process of the state gender policy. No experience in the ministry or agency. Service providers on the ground in case of an occurrence. In cases of incidents, there is a manual for referral.
Nasarawa	The state has, through the public sector, a gender desk officer and is currently undergoing the domestication of gender policy in the state, with only the validation in collaboration with the Minister of Women Affairs, who solely handles gender mainstreaming in the state. The health sector provides treatment for victims. Arrest and prosecution of perpetrators are handled by the Ministry of Women Affairs. Frequently, presentations on prevention are being made to health care workers, and the law calls for outright dismissal from service. No segregation in employment or property is given to females as well as males.

Question	Has there been any complaint about discrimination due to religion or gender in your programs?
State	Response
Kwara	No complaints on such ever received to the best of his knowledge
Borno	Not existent in Borno State, there are many faith based organization
Nasarawa	Has a system of zero tolerance to discrimination as the service provided is to the people of the state

Question	If there was, how did you handle it?
State	Response
Kwara	Nil
Borno	Nil

Nasarawa	Nil
----------	-----

Question	Do you have a policy or regulation regarding gender discrimination or discrimination due to religion or tribe?
State	Response
Kwara	Yes, a Violence Against Persons provisions act (VAP law)
Borno	They operate based on their constitution, which does not discriminate. If there is a policy for discrimination, then the problem is there, but they do not have the problem. People refusing medical treatment based on religious instruction is the vase they have.
Nasarawa	The validation of the gender policy is the only thing left to domesticate. All the regulations are captured in the policy document. The effect of noncompliance with the regulation applies to the person.

Annex 5: List of Participants at Consultation with States

Name	MDA	Designation	State
Julienne Darlington-Nwoke	Rivers State Ministry of Health	Head Health Planning, Ag. Director of Health Services, Standards and Quality Control, Rivers State Contributory Health Protection Program.	River
Chinwe Atata	Ministry of Health	Director of Planning, Research and Statistics	Rivers
Precious Jack		Head of Planning, Policy & Budget	River
Ogochukwu Orji	Ministry of Budget and Economic Planning	SSA to the Governor on Budget and Economic Planning	Anambra
Ogochukwu Orji	Ministry of Budget and Economic Planning	SSA to the Governor on Budget and Economic Planning	Anambra
Christopher Edenwatu	Ministry of Education	Director Planning Research and Statistics	Enugu
Chris Edenwatu	Ministry of Education	Director Planning Research and Statistics	Enugu
Christopher Edenwatu	Ministry of Education	Director Planning Research and Statistics	Enugu
Dr. Isiaka Adekunle	Ministry of Health	Permanent Secretary	
Mr Patrick Ochi	Ministry of Education	Permanent Secretary	Enugu
Mrs Francisca Nwokolo	Ministry of Education	Director Schools	Enugu
Mrs ozougwu Nnene	Ministry of Education	Director Lib/ICT	Enugu
Mr kingsley Eneh	Ministry of Education	Director Finance and Acct	Enugu
Mr Sylvanus Ogbodo	Ministry of Education	Director Admin and Supply	Enugu
Mrs Easter Nwoga	Ministry of Education	Director Education Services	Enugu
Bar. ikwueze	Ministry of Education		Enugu
Mr Chris Edenwatu	Ministry of Education	Director Planning Research and Statistics	Enugu
Mr Samuel Udeh		Head of EMIS	Enugu
Otunuga Akinyemi Olajide	Ministry of Budget and Planning	Director. Planning	Ogun
Akinwande Kayode Segun	Ministry of Environment	Dir. PRS	Ogun
Hon Mayowa Adejorin		Commissioner For Environment and Sanitation	Osun
Danjuma Saigudu		Director of Budget	Taraba
Chiamaka Nnake			
Oluwakemi			
SAMUEL UDEH			
Dr Obinna Muoh			
DPC			
Kofoworola Olajide			

Dr. Isiaka Adekunle			
Ochi Patrick			
Dr Elijah Ayowole Ogunsola			
Prof Shehu Raheem Adaramaja	Executive Chairman	Kwara State Universal Basic Education Board, Ilorin	Kwara
Alh. Alimi K.Surajudeen	Director Planning		Kwara
Mr. Peter Wale Awoniyi	Director Planning Research and Statistics	Ministry of Health	Kwara
Olanrewaju Bake Rebecca	Permanent Secretary	Ministry of Education and Human Capital Development. Ilorin	Kwara
Adewuyi V. F.,	Director, Curriculum Assessment	Ministry of Education and Human Capital Development. Ilorin	Kwara
Ade Aboyeji O.O	Director QAB	Ministry of Education and Human Capital Development. Ilorin	Kwara
Dr Abubakar Hassan	Special Adviser Health, Governor	Governor's Office	Borno
Aisha Musa Sheikh	Permanent Secretary	Ministry of Education	Borno
Engr. Ibrahim Baba			Borno
Hassana Pindar	Team Member Safeguards, Agile		Borno
Kabiru Mohammed	Team Member Safeguards, Agile		Borno
Prof Baba Mallam Gana	Commissioner for Health and Human Services	Ministry of Health and Human Services	Borno
Dr. Ibrahim Adamu Alhassan	DPH		Nasarawa
Baba Gana Goni Ali	Director PRS	SUBEB	Nasarawa
Cindy Ijeoma Ikeaka,	Senior Social Development Specialist	World Bank	
Ikechukwu John Nweje	Senior Public Sector Specialist	World Bank	
Ugonwa Unaogu	Public Sector Specialist	World Bank	
Nnaemeka Chukwuone	Consultant	World Bank	
Olufunmilola Temitayo Ayoola	Social Development Specialist	World Bank	
Halima Femi Pat-Natson	Consultant	World Bank	

Annex 6: List of Participants at the Presentation of the ESSA Findings

Ikechukwu Nweje, TTL, World Bank
Cindy Ikeaka, Senior Social Development Specialist World Bank
Ahmed Abdullahi, Environmental Specialist, World Bank
Ugonwa Unaogu, Public Sector Specialist, World Bank
Oluwakemi Folake Balogun, World Bank
Assad Hassan, NPC, FMBEP
Adebayo Adeniyi, Head, Social Economic Development, Osun State, Ministry of Economic Planning, Budget and Development
Ogbodo Chijioko Idoko, Director Planning, Ebonyi State Ministry of Budget Planning Research and Monitoring
Ijeoma Uchenwoke, Deputy Director, Primary Education, Federal Ministry of Education, Abuja.
Adeobayemi Taiwo Opeyemi, Principal Education Officer, Federal Ministry of Education, Abuja
Felicia Nwofe, Federal Ministry of Budget and Economic Planning,
Adesina Bukola Samuel, Director, Economic Planning, Ministry of Economic Planning, Budget and Development, Osun State.
Elisha Japheth; Federal Ministry of Budget and Economic Planning
Adebayo Abdulazeez Ayodele, Federal Ministry of Budget and Economic Planning, Assistant Chief planning Officer-Desk officer-Environment Impact Assessment (Environment and Regional Development Division)- Social Development Department.
Dr (Mrs)Folake Olatunji-David Director Basic Education Federal Ministry of Education
Adebayo Abdulazeez Ayodele, BEP
Dr Sanjo Faniran- Director- Social Development Department Federal Ministry of Budget and Economic Planning
Bukola Adesina
Rufa'I Mohammed