



KINGDOM OF LESOTHO

**MINISTRY OF EDUCATION AND TRAINING (MoET)
&
MINISTRY OF SOCIAL DEVELOPMENT (MoSD)**

**BASIC EDUCATION STRENGTHENING PROJECT (BESP)
(P175065)**



Volume 1: The ESMF

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

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OTHER REPORTS IN THIS SERIES

The Lesotho Basic Education Strengthening Project (BESP) Environmental and Social Management Framework (ESMF) forms part of a series which is intended to provide complete documentation for the requirements of a holistic Environmental and Social Safeguards management system for the project. This ESMF contains the findings of a study conducted for the Education and Social services sectors of the Kingdom of Lesotho and the instrument has been developed based on the local conditions and findings.

The following documents form the series:

1. **Volume 1: The ESMF**
BASIC EDUCATION STRENGTHENING PROJECT (BESP)
ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK
2. **Volume 2: The SEP**
BASIC EDUCATION STRENGTHENING PROJECT (BESP)
STAKEHOLDER ENGAGEMENT PLAN (SEP)
3. **Volume 3: The ESCP**
BASIC EDUCATION STRENGTHENING PROJECT (BESP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

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LIST OF ABBREVIATIONS.

AIDS	Acquired Immunodeficiency Syndrome
ACRWC	African Charter on the Rights and welfare of the Children.
CC	Community Councils
CRC	Convention on the Rights of the Child
CPF	Country Partnership Framework
DEO	District Environmental Officer
DoP	Department of Planning
DPS	Deputy Principal Secretary
EA	Environmental Assessment
E&S	Environment and Social
ECD	Early Childhood Development
EAP	Emergency Action Plan
ECCD	Early Childhood Care and Development
EIA	Environmental Impact Assessment
EIS	Environmental Impact Study
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
ECCD	Early Childhood Care and Development
ECE	Early Childhood Education
ECoL	Examinations Council of Lesotho
EGRA	Early Grade Reading Assessments
EGR	Early Grade Reading
EMIS	Education Management and Information System
ESA	Education Sector Analysis
ESSP	Education Sector Strategic Plan
GBV	Gender Based Violence
GDP	Gross Domestic Product
GER	Gross Enrolment Ratio
GIIP	Good International Industry Practice
GoL	Government of Lesotho
GRM	Grievance Redress Mechanism
GPE	Global Partnership for Education

HCI	Human Capital Index
HIV	Human Immunodeficiency Virus
IECCD	Integrated Early Childhood Care and Development
ICT	Information and Communication Technology
KRA	key result areas
LBEIP	Lesotho Basic Education Improvement Project
LCE	Lesotho College of Education
LEG	Local Education Group
LEQEP	Lesotho Education Quality Enhancement Project
LMIC	Lower Middle-Income Country
LMP	Labour Management Procedure
ILO	International Labour Organization
MCST	Ministry of Communication, Science and Technology
M&E	Monitoring and Evaluation
MDP	Ministry of Development Planning
MELQO	Measurement of Early Learning and Quality Outcomes
MFDP	Ministry of Finance and Development Planning
MICS	Multiple Indicator Cluster Survey
MoET	Ministry of Education and Training
MoF	Ministry of Finance
MoSD	Ministry of Social Development
MTEC	Ministry of Tourism, Environment and Culture.
NCDC	National Curriculum and Development Centre
NEP	National Environmental Policy
NES	National Environmental Secretariat
NGO	Non-Governmental Organization
NIP	National Implementation Plan
NSDP	National Development Strategic Plan
NISSA	National Information System for Social Assistance
NJCTL	New Jersey Centre for Teaching and Learning
NUL	National University of Lesotho
OHS	Occupational Health and Safety
OVC	Orphans and Vulnerable Children
PDO	Programme Development Objective
PEP	Post-Exposure Prophylaxis
PFU	Project Facilitation Unit
PS	Principal Secretary
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse

SEP	Stakeholder Engagement Plan
SIP	School Improvement Plan
SP	Social Protection
SSA	Sub-Saharan Africa
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
WASH	Water, Sanitation, and Hygiene
WB	World Bank

EXECUTIVE SUMMARY

Background

The Government of Lesotho through the Ministry of Education and Training and Ministry of Social Development is in the process of preparing a Basic Education Strengthening Project (BEST) (P175065), with World Bank technical and financial support. As one of the prerequisites for the project through the World Bank, an Environmental and Social Management Framework (ESMF) must be developed. The ESMF has been prepared in accordance with the World Bank Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESSs), in particular the ESS1.

The project development objective is to improve student retention and teaching quality¹ in junior secondary schools in targeted regions of Lesotho and pilot a new curriculum to strengthen ECCD service delivery. This will be implemented through three inter-linked components as follows:

Component 1: Improving student retention in junior secondary education (US\$5.0 million)

This component will focus on improving transition to, and retention of, students in junior secondary education in targeted regions in Lesotho where poverty rates are high and student retention is low, as well as support improvements in Math and Science instruction in schools located in these regions by supporting the scale-up of an existing online teacher training program that has shown to improve student learning. Thus, the component will:

- a) provide assistance to families to address financial barriers to secondary education,
- b) support adolescent boys and girls through youth clubs and equip them with relevant life-skills and reproductive health knowledge to ensure that they stay in school, and
- c) support online teacher training for Mathematics and Science teachers in junior secondary schools to improve the quality of teaching including related to remedial education such as continuous assessment of students to understand their level of learning and where they need additional support.

Component 2: System strengthening to improve ECCD service delivery (US\$1.4 million)

This component will focus on selected interventions to strengthen ECCD service delivery in Lesotho including by piloting and evaluating the new ECCD curriculum in reception classes and ECCD centres and mapping ECCD providers and building a monitoring and support system to better manage the sub-sector. Thus, the component will:

- a) Pilot and evaluate the new curriculum in reception classes and ECCD centres.
- b) Map ECCD service providers and strengthen monitoring and support systems.

¹ Teaching quality under this project refers to teacher content knowledge and pedagogical skills in Mathematics and Science.

Component 3: Project management, capacity building and technical assistance (US\$0.7 million)

The objective of this component is to strengthen institutional capacity of the MoET, which is the main implementer of most project interventions. Specifically, the component will provide support to strengthen key management and technical areas to ensure that MoET is able to effectively implement the project interventions and improve student retention in the target areas. Both under the MoET and MoSD, existing project facilitation units (PFUs) will be used to jointly coordinate the project implementation by supporting the implementing departments under their respective ministries.

Components 1, and 2 are comprised of activities which have a bearing on physical and social environments, hence the need to prepare an Environmental and Social Management Framework (ESMF).

Rationale for the BESP ESMF

The proposed programme constitutes several components or activities, which will generate varying effects to different components of the environment and the society at large. In the main the activities include i) improving transition to and retention of students in junior secondary education, ii) scaling up online teacher training program for junior secondary teachers in Mathematics and Science, and iii) strengthening the delivery of ECCD services, including by piloting, and evaluating the revised ECCD curriculum and mapping ECCD service providers to improve monitoring and accountability. The activities will directly and indirectly generate impacts that may result in social conflict, incidence of E-waste and solid waste generation, and promotion of GBV/SEA. Consequently, several environmental and social components will potentially be affected by such activities which necessitates an ESMF. The overall environmental and social risk rating of the project is moderate, in which the environmental risk is low while the social risk is moderate.

The ESMF is a tool to examine the risks and impacts when a project consists of a programme and/or series of subprojects and the affected persons, risks and impacts cannot be determined until the programme or subproject details have been identified. In the case of this project, while the general types of activities are known, their locations, size, capacity, design, and magnitude are not yet established, hence the need for an ESMF.

This ESMF has been prepared as a guide for the initial screening of proposed activities for any negative environmental and social impacts, which would require attention prior to project implementation. This ESMF is to be used by the BESP to ensure that all environmental and social safeguards are adequately addressed and that the relevant capacity building and training needs are established for the recommended measures to be implemented effectively. Further, the ESMF has been prepared as a guide for the integration of environmental and social considerations into the design, planning and implementation of the proposed programme activities. It also provides a basis for specific environmental and social assessments of all sub-projects to be carried out under this proposed financing.

The ESMF Process

The ESMF development process consisted of the following aspects: (i) establishment of baseline socio-environmental conditions, (ii) development of the screening criteria/tool, (iii) review of policy, regulations, institutional framework, (iv) assessment of potential environmental impacts, (v) assessment of potential social impacts (vi) preparation of the environmental and social mitigation plan and a monitoring plan and (vii) providing guidelines for the implementation of the measures.

The process involved extensive review of related literature from published and unpublished documents, investigations and scanning of the Lesotho education sector, and consultations with the various stakeholders. The rationale of the consultations was to take on board views from a cross section of people, at the local level, district level, and central government level. Overall, the ESMF ensured that the substantive concerns of the relevant World Bank Standards and the Lesotho legislation will be considered during the implementation of the BESP activities.

Policy, Legal and Institutional Framework

The policy and legal review established that the BESP will be supported by a host of laws, regulations and institutions that promotes sustainable basic education strengthening, whilst protecting the environment and the well-being of the population of Lesotho. All these instruments are guided by the Lesotho Constitution which emphasizes on prudent management of the environment and accords future generations full rights to the environment and benefits thereof.

The World Bank remains committed to mainstreaming social, environmental and climate change solutions into bank funded programmes, thus BESP was designed and informed by the World bank's Environmental and Social Framework (ESF). The Environmental and Social Framework consists mainly of the Environmental and Social Policy for Investment Project Financing (IPF) with ten (10) Environmental and Social Standards (ESS), that it uses to examine potential environmental and social risks and benefits associated with Bank lending operations. The ESMF has been developed in accordance with the requirements of ESS1 and the other relevant World Bank Environmental and Social Standards (ESSs) include ESS2, ESS3, ESS4, ESS7 and ESS10.

Programme Categorization

While the project overall risk rating is Moderate", the social risk rating is considered "Moderate" and the environmental risk rating is "low", the political and governance risk is rated as Substantial, given the political fragmentation and instability, frequent elections (2015, 2017), teachers' strike and high turnover of Ministers and Principal Secretaries (PSs) between elections. This risk may be partly mitigated by the consistent presence of technical staff within the PFU, that supports implementation of the World Bank and GPE financed projects, as has been the case under LBEIP and LEQEP.

The social risk rating is considered "Moderate" mainly because the country-level social risks of Sexual Exploitation/Harassment and GBV are rated as moderate, and the project will not directly or indirectly cause or contribute to any of the pre-existing social issues related to

gender-based violence but will attempt to ultimately contribute to their mitigation through improving educational outcomes and school retention rates for girls and boys.

The environmental risk classification for the proposed Project is low since the proposed Project is expected to have generally positive environmental impacts and components are not anticipated to result in any substantial or irreversible impacts as the project will not support any construction activities.

Environmental and Social Assessment Process

To ensuring that potential environmental and social impacts are identified and ultimately adequately addressed, a stakeholder consultation process was established. The process involves identifying the concerned/affected stakeholders, soliciting their views, and continuously checking if their views are being considered as the project implementation progresses.

The ESMF emphasises the need for continuous consultations with stakeholders throughout the programme cycle to achieve successful implementation and monitoring. Both the MoET Project Facilitation Unit (PFU) and the MoSD Project Facilitation Unit (PFU) will have the responsibility to effectively engage stakeholders in achieving the project objectives for the benefit of all. The ESMF outlines a Stakeholder Engagement Plan (SEP) which describes the objectives of the SEP, the key stakeholders, information disclosure and consultation means, grievance redress mechanism, feedback, and monitoring.

The most important facets of the stakeholder consultation process are the **Grievance Redress Mechanism (GRM)**. The GRM will be a system by which queries or clarifications about the project will be responded to, problems with implementation will be resolved, and complaints and grievances will be addressed efficiently and effectively. The GRM will mainly serve the purpose of responding to the needs of beneficiaries and addressing and resolving their grievances.

Environmental and Social concerns and mitigation of impacts

The potential associated impacts were analysed and mitigation measures for the identified impacts proposed.

The major environmental impacts will include the Increased generation of e-waste, hazardous waste, and solid wastes, emanating from the laptops and solar panels that will be provided to schools. The potential waste will need to be managed carefully to prevent public health risk and environmental impacts. This will be done in line with the requirements of the “Solid, Hazardous and E-Waste Management Plan” in Appendix 9.

The major Social Impacts will include i) poor stakeholder consultation due to the Pandemic restrictions, ii) poor targeting causing conflicts due to lack of clear selection criteria of project beneficiary areas and communities, and iii) high chances of **Gender Based Violence (GBV) and SEA** as the project gets underway and women and youths are exposed to predators. Assessment of exposure and appropriate preventive actions must be carried out to avoid gender-based violence at all costs. This will be done in accordance with the GBV action plan in Appendix 10.

The ESMF then establishes a process for addressing all environmental and social issues in sub-projects from preparation, through review and approval, to implementation.

Though labour influx is not anticipated, the ESMF includes measures to avoid, minimize, manage, and mitigate any Gender Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) risks. Additionally, GBV/SEA, HIV/AIDS risks will be monitored throughout the project cycle.

Capacity Building

The successful implementation and monitoring of the environmental and social management framework (ESMF), will require that target groups and stakeholders who play a role in the implementation of the ESMF, be provided with appropriate training and awareness. This is necessary because the implementation of the activities will require inputs, expertise and resources which will be adequately taken care of if the concerned parties are well capacitated. Careful and strategic identification of training recipients should be carried out at the beginning of the Programme.

Generally, MoET, MoSD and the PFU at national, district and community levels have limited capacity in the application of the ESMF and applicable Standards. In this regard the PFU has to employ an Environmental and Social Safeguards Specialist to make sure the ESMF is implemented adequately.

ESMF Budget

The total estimated amount needed to cover all the work to be carried out under the ESMF preparation and implementation for the sub-projects is **US\$ 181,500.00**. The key indicative aspects that would require a cost budget include training and capacity building for the project PFU; training and capacity building for the project district and local level teams; and implementation of the stakeholder engagement plan.

Conclusions and Recommendations

The proposed project has potential to significantly improve the basic education in the target districts. The improvement in basic education that the community will benefit, will translate to improved livelihood as people become productive and this will translate ultimately to an improved economy.

The BESP is depicting more positive than negative potential environmental and social impacts. The negative impacts are generally indirect, like impacts from the resultant e-waste and solid waste generated by the ICT equipment that will be purchased by the project. These envisaged negative environmental and social impacts will be localized, minimal, short term and can be mitigated. The final benefits of this project to the nation will, by far outweigh any potential negative effects. Further, the project will overall not have any apparent significant environmental and social impacts if the recommended mitigations are carried out.

1. PROJECT OVERVIEW

1.1 INTRODUCTION

The Government of Lesotho through the Ministry of Education and Training (MoET) and Ministry of Social Development (MoSD) is in the process of preparing a Basic Education Strengthening Project (BESP) (P175065), with World Bank technical and financial support. As one of the prerequisites for the project through the World Bank, an Environmental and Social Management Framework (ESMF) must be developed.

The Lesotho BESP will be implemented over a period of five years and will comprise various sub-projects located at various locations throughout the country. The project will adopt a needs-based targeting approach. It will not be able to address all the constraints that limit the efficiency and productivity of the basic education sector. Thus, to maximize its impact and address some of the persistent disparities in the system, the project will target districts with the highest dropout rates and children from the poorest households.

The Education sub-project activities in the various districts will have a bearing on physical and social environments. In accordance with the requirements of the Environmental and Social Framework (ESF), there is a need to prepare environmental and social safeguards instruments to protect the environment in the course of implementation of the sub-projects. In this case an environmental and social management framework (ESMF) and a stakeholder engagement plan (SEP).

The proposed Lesotho BESP comprises three components as follows (See Section 1.4 for details): (i) Improving student retention in junior secondary education (US\$5 million), (ii) System strengthening to improve Early Childhood Care and Development (ECCD) service delivery (US\$1.4 million), and (iii) Project management, capacity building and technical assistance (US\$0.7 million). Components 1 and 2 are comprised of activities which have a bearing on physical and social environments, hence the need to prepare an Environmental and Social Management Framework (ESMF).

This Environmental and Social Management Framework (ESMF) is to be used by the BESP in order to ensure that all environmental and social standards are adequately addressed and that the relevant capacity building and training needs are established in order for the recommended measures to be implemented effectively.

1.2 PROJECT DESCRIPTION

The aim of the project is to improve student retention and teaching quality in junior secondary schools and pilot a new curriculum to strengthen ECCD service delivery. The proposed project will focus on key activities that are priorities for the MoET within the context of its Education Sector Strategic Plan (ESSP), and the updated ESSP implementation plan, and build on lessons learned and opportunities arising from ongoing projects, including Lesotho Education Quality Enhancement Project (LEQEP) and Lesotho Basic Education Improvement Project (LBEIP). These include:

- (i) improving transition to and retention of students in junior secondary education,

- (ii) scaling up online teacher training program for junior secondary teachers in Mathematics and Science, and
- (iii) strengthening the delivery of ECCD services, including by piloting, and evaluating the revised ECCD curriculum and mapping ECCD service providers to improve monitoring and accountability.

Across all interventions, inclusive education will be a key cross-cutting focus area that will be supported by identifying specific strategies to ensure that all children, including those with disabilities can fully benefit from the project interventions.

The intervention areas (i.e., junior secondary and ECCD) were identified as priorities for the project for the following reasons:

- Within the basic education system, the dropout rate is the highest at the junior secondary level and is likely to worsen under the ongoing COVID-19 pandemic. The impact of the pandemic is expected to be worse at the junior secondary level as the economic impact of the lockdown is likely to make junior secondary education unaffordable for many students (junior secondary education is not free). So, the constraints on the demand and supply-sides, of the education system needs to be addressed if Lesotho is to ensure universal access to basic education.
- With the challenges related to the ongoing COVID-19 pandemic, which include the impact of health and safety measures (e.g., school closures, limitations on face-to-face training, etc.). which make integration of technology in education service delivery, including in teacher training, particularly important to mitigate against these challenges and build resilience in the education system.
- At the ECCD level, there are significant access, quality and monitoring related gaps that are affecting the delivery of early childhood education. While this project will not tackle these gaps at scale, it will provide system strengthening support in selected areas, to lay a strong foundation to improve the delivery of ECCD in the future.

The components and sub-components of the project are listed in Table 2 and described in more detail below.

1.3 PROJECT DEVELOPMENTAL OBJECTIVE (PDO)

To improve student retention and teaching quality² in junior secondary schools in targeted regions of Lesotho and pilot a new curriculum to strengthen ECCD service delivery.

1.3.1 PDO Level Indicators

The following key results will be used to measure progress towards the PDO:

- Reduction in dropout rate (Grade 8–Grade 9) in targeted regions (disaggregated by gender)
- Improvements in content knowledge and pedagogical skills of math and science teachers in

² Teaching quality under this project refers to teacher content knowledge and pedagogical skills in Mathematics and Science.

targeted schools

- Improvement in a child's readiness³ to start primary education for children attending the pilot ECCD centres.

1.4 PROJECT COMPONENTS

To address the key sector challenges and support the achievement of the PDO, the proposed project consists of three interlinked components.

1.4.1 Component 1.

Improving student retention in junior secondary education.

This component will focus on improving transition to, and retention of, students in junior secondary education in targeted regions in Lesotho where poverty rates are high and student retention is low, as well as support improvements in Maths and Science instruction in schools located in these regions by supporting the scale-up of an existing online teacher training programs that has shown to improve student learning. To this end, the component will: (a) provide assistance to families to address financial barriers to secondary education, (b) support adolescent boys and girls through youth clubs and equip them with relevant life-skills and reproductive health knowledge to ensure that they stay in school, and (c) support online teacher training for Mathematics and Science teachers in junior secondary schools to improve the quality of teaching including related to remedial education such as continuous assessment of students to understand their level of learning and where they need additional support.

1.4.2 Component 2.

System strengthening to improve ECCD service delivery.

This component will focus on selected intervention to strengthen ECCD service delivery in Lesotho including by piloting and evaluating the new ECCD curriculum in reception classes and ECCD centres and mapping ECCD providers and building a monitoring and support system to better manage the sub-sector.

1.4.3 Component 3.

Project management, capacity building and technical assistance

The objective of this component is to strengthen institutional capacity of the MoET, which is the main implementer of most project interventions. Specifically, the component will provide support to strengthen key management and technical areas to ensure that MoET is able to effectively implement the project interventions and improve student retention in the target areas. Both under the MoET and MoSD, existing project facilitation units (PFUs) will be used to jointly coordinate the project implementation by supporting the implementing departments under their respective ministries.

³ Measured by the child direct assessment score which consists of: (i) literacy/language, (ii) mathematics/numeracy, (iii) executive function, and (iv) fine motor skills following the MELQO child assessment tool.

1.5 PURPOSE AND OBJECTIVES OF THE ESMF

This ESMF was prepared because the location, design, and magnitude of the impacts of the eventual sub-projects is not yet known at project appraisal stage, even though the types of potential subprojects are well defined. It provides a guide for the integration of environmental and social considerations into the planning and implementation of the Education related project activities that Lesotho is proposing. It further provides a basis for environmental and social assessments of all sub-projects to be carried out under this proposed financing.

The ESMF focuses on the nature and extent of significant adverse environmental and social impacts that may result from any of the Education activities and serves as a framework for screening environmental and social issues for all possible Education activities that will be undertaken. It establishes a unified process for addressing all environmental and social standards issues on sub-projects from preparation, through review and approval, to implementation. The ESMF provides a clear, comprehensive, and practical guidance to the MoET project facilitation unit (MoSD PFU, and other project implementation entities, on integrating environmental and social considerations into the project.

The ESMF also describes a process that will ensure that the substantive concerns of the applicable World Bank Environmental and Social Standards (ESS) and Lesotho legislation are addressed during the implementation of the Basic Education Strengthening Project activities. It also allows for the establishment of relevant capacity building and training needs, for the recommended measures to be implemented effectively.

The main purposes of the ESMF are to:

- i. Identify all relevant potential environmental risks and social concerns that may arise because of the project and the subprojects that will be supported by the BESP,
- ii. Develop a generic ESMP that can be applied to manage the identified environmental and social risks and set out the monitoring plan that will be undertaken to confirm correct ESMP delivery,
- iii. Establish clear procedures and methodologies for the environmental and social assessment, screening, review, approval, and implementation of sub-projects to be financed under BESP,
- iv. Review and assess the capacity of the national project implementation entities, to screen subprojects and monitor the implementation of the project ESMP; and make proposals for capacity enhancement as appropriate,
- v. Specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to project investments,
- vi. establish the budgetary requirements for the implementation of the main project ESMP,
- vii. Develop a public consultation and stakeholder engagement strategy,
- viii. Define appropriate environmental and social standards performance indicators.
- ix. Provide practical information resources for implementing the ESMF.

2. BIO-PHYSICAL ENVIRONMENT AND SOCIO-ECONOMIC BASELINE REVIEW

2.1 COUNTRY CONTEXT

Lesotho is a land locked state in Southern Africa which is surrounded by the Republic of South Africa. It is situated approximately between 28° S and 31°S latitudes and longitude 27° E and 30° E. Lesotho is a predominantly mountainous country, with an average altitude of more than 1600 meters above sea level. It covers approximately 30,350 square kilometres and has limited natural resource endowments (GoL, 2006a).

The country is a lower-middle-income country with a population of 2.2 million in 2017 and a per capita Gross National Income of US\$1,280 (in current US\$).⁴ It generates income mainly through the agriculture sector, and from exporting textiles, water, and diamonds.

2.2 BIOPHYSICAL ENVIRONMENTAL BASELINE

The BESP project will be implemented in all the ten districts of the country. The following paragraphs review some of the key country's background information as regards the bio-physical environment.

2.2.1 Topographical Features

Three distinct geographical regions, demarcated by ascending altitude, extend approximately north-south across Lesotho. The western quarter of the country is a plateau averaging 1,500-1,850 m. The remainder of the country is highland. A zone of rolling foothills, ranging from 1,800-2,200 m, forms the border between the lowlands and the mountains in the east.

The Drakensberg Range forms the entire eastern and south-eastern border. A spur of this range, the Maluti Mountains, runs north and south. Where it joins the Drakensberg Range there is a high plateau ranging from 2,700-3,200 m in elevation. The highest point is Thabana Ntlenyana, 3,482 m, in the east.

The mountain zone in Lesotho covers approximately 65% of the total land area at elevations ranging between 2,300 and 3,480 meters above sea level. This land is mostly characterized by steep slopes, extensive soil erosion, and deep gullies (or dongas). The rugged and broken terrain makes it difficult to adequately deliver education services to most of the population especially in the rural areas.

2.2.2 Climatic Conditions

The climate is harsh, with temperatures varying from -10 degrees Celsius (in winter) to 30 degrees Celsius (in summer) in the lowlands. In the highlands, winters are more severe, with heavy snowfalls that often cut off access to most of the mountain settlements. The climate can be classified as continental and temperate, with four distinct seasons: spring, summer,

⁴ World Bank National Accounts Data.

autumn and winter. The summers often have high temperatures and precipitation due to the position of the Inter-tropical Convergence Zone (ITCZ), i.e., being south of the equator. In winter, the presence of high-pressure results in clear skies, dry air, and warm temperature during the day, but becomes colder after sunset.

2.3 SOCIO-ECONOMIC ENVIRONMENT

Lesotho's economic growth has declined in recent years and fiscal challenges remain elevated, leading to fiscal consolidation. Real Gross Domestic Product (GDP) growth has declined from 3.1 percent in 2017 to 1.7 percent in 2018. Economic risks are related to the sharp declines in Southern African Customs Union (SACU) revenues, uncertainty of the Africa Growth and Opportunity Act renewal, inflation due to drought-induced higher food prices, and South Africa's declining growth.

Lesotho faces high levels of poverty and inequality. Between 2002 and 2017, the national poverty rate declined only modestly, from 56.6 percent to 49.7 percent. Urban areas recorded strong poverty reduction (from 41.5 to 28.5 percent) while rural poverty stagnated at 61 percent, adding to an already large urban-rural divide. Food poverty declined from 34.1 to 24.1 percent while the poverty gap declined from 29.0 to 21.9 percent.

Lesotho's Human Capital Index is lower than what would be predicted for its income level. Lesotho's human capital index is 0.37 and below the Southern African Development Community average of 0.43.

The Government's 2018-2023 National Development Strategic Plan (NSDP II) aims to address these challenges by enhancing education and skills development.

2.3.1 Population and Demographic Conditions

The population of Lesotho in 2005 was estimated by the United Nations (UN) at 1,804,000, which placed it at number 142 in population among the 193 nations of the world. The population is currently at 2.2 million and growing at an average rate of 2.1% per annum. In 2005, approximately 5% of the population was over 65 years of age, with another 38% of the population under 15 years of age. There were 87 males for every 100 females in the country. According to the UN, the annual population rate of change for 2005–2010 was expected to be -0.1%. The projected population for the year 2025 was 1,604,000. The population density was 59 per sq. km (154 per sq. mi). Some 70% of the total population lives in the fertile lowlands, where the land can be most readily cultivated; the rest is scattered in the foothills and the mountains. The population distributions have a significant bearing on the education services delivery system.

The UN estimated that 13% of the population lived in urban areas in 2005, and that urban areas were growing at an annual rate of 0.75%. The capital city, Maseru, had a population of 170,000 in that year. Other large towns are Leribe, Berea, and Mafeteng.

2.3.2 Socio-economic Conditions

In 2017 the unemployment rate stood at 27.25%. and is unlikely to have changed much, even as underemployment and low productivity employment is widespread, especially in rural areas. Preliminary government estimates based on the 2010/11 Household Budget

Survey show that the national poverty head count rate stood at 57.1% and the Gini Coefficient based on consumption stood at about 0.53. Poverty has decreased in urban areas, while poverty has increased in rural areas.

With so many men working away from home, many women in Lesotho are left to take care of the family and tend their fields alone. When the men do not send enough money home, women must find alternative ways to make ends meet, such as selling handcrafts, brewing beer, or working on neighbour's farms. Thus, the majority of the workforce that will be available for BESP is expected to be women.

2.3.3 Education

Officially, almost all children enrol at school but only half complete their final primary year. Only 41 percent of children of relevant age complete lower secondary school, and enrolment in secondary is 33.4 percent. There are no government secondary schools; so many families cannot afford secondary education, even for successful students.

In contrast to some other countries, some girls in Lesotho can continue their education further than boys because they are not forced to leave home early to find employment. Other parents prefer to see their daughters married young. Estimates of adult literacy vary widely, but there are significant numbers of adults who cannot read and write.

2.3.4 Health

Diseases such as TB and HIV/AIDS are wreaking havoc in Lesotho (24% of the population). The scourge was exacerbated by the system of labour migration, which generally exposed people to high-risk behaviour and made migrants more vulnerable to infection. The migrants imported the diseases back to their families, infecting many people who never migrated. Then the additional consequence is that rural people's scarce resources are used in caring for the sick ones, covering funeral expenses, and supporting orphans. With an HIV prevalence of 24%, Lesotho ranks as the second country most impacted by HIV/AIDS in the world.

2.3.5 Labour Influx and associated social impacts

Activities to be implemented under this project are not likely to result in establishment of labour camps, thus labour influx is unlikely in beneficiary communities. Though, labour influx is not anticipated, the site specific ESMPs will include measures to avoid, minimize, manage, and mitigate any Gender Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) risks.

2.3.6 Gender Based Violence (GBV)

Lesotho has made efforts to attain gender equity and equality, but legislation, customary law and practice still contain considerable gaps and GBV incidents are common. The GBV risk for the project will be assessed thoroughly in the ESMP once potential subproject sites and specific project activities have been identified. Interventions will be tailored to project realities and in-country context and may include e.g., unconscious bias trainings, career choice guidance, addressing education service gaps, institutionalizing GBV prevention and response mechanism, establishing women's professional networks and access to upskilling and training opportunities.

GBV/SEA, HIV/AIDS risks will be monitored throughout the project cycle (GoL. 2003; Lesotho CCA, 2017), in line with the GBV action plan in Appendix 10.

3. POLICY, LEGAL AND REGULATORY FRAMEWORK

3.1 INTRODUCTION

In this chapter, relevant Lesotho regulations and policies are assessed that guide the environmental and social assessment for BESP activities, as well as relevant World Bank Environmental and Social Standards and international conventions. The objective is to ensure that project activities and implementation processes are consistent with local laws and policies and World Bank Standards, and to point out possible gaps in local legislation in view of full compliance with World Bank standards.

The Constitution of Lesotho, which is the basic law governing the Kingdom of Lesotho, was adopted in 1993 and has been revised five times. One of the aims of the Constitution is promoting and consolidating sustainable socio-economic development in the country through the mainstreaming of environmental and social considerations in project planning and implementation.

Education is articulated as one of the fundamental rights in the Constitution of Lesotho of 1993 in Chapter III. As regards Education, the Constitution states that Lesotho shall adopt policies aimed at ensuring that education is available to all and encourages authorities to adopt policies aimed at securing that.

Thus, the National Constitution and the legal framework have set a good note for the implementation of good education delivery for all. The following paragraphs highlight some of the policies and laws that are applicable in the development of the education sector.

3.2 THE CONSTITUTION OF LESOTHO

The Constitution of Lesotho, came into force in 1993, providing for the separation of judicial, legislative, and executive powers. Table 3-1 is an outline of the relevant sections of the Lesotho Constitution:

Table 3-1 The Constitution of Eritrea

NO.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
1.	The Constitution of Lesotho 1993 with Amendments through 2011	Section 28 presents the “Provision for education” as one of the principles of state policies in an endeavour to make education available to all and encourages authorities to adopt policies aimed at securing that. Section 36 provides “Protection of environment” and thus requires authorities to adopt policies designed to protect and enhance the natural and cultural environment of Lesotho for the benefit of both present and future generations and endeavour to assure to all citizens a sound and safe environment adequate for their health and well-being.	The Lesotho constitution forms legal basis where all developmental policies, regulations, guidelines do not contravene the provisions of the Constitution, to safeguard against the elements of environmental distress and educational deprive or compromise when developing and implementing of national development projects. It is therefore critical to ensure that the execution of construction works under BESP do not adversely compromise the protection of the environment for the benefit of both the present and the future generations.

3.3 LEGAL FRAMEWORK

3.3.1 Overview of Lesotho Legislation

3.3.1.1 The Environmental, Climate and Tourism Laws

Table 3-2 is an outline of the relevant Environmental, Climate and Tourism Laws:

Table 3-2 The Environmental, Climate and Tourism Laws

NO.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
1.	National Environmental Policy, 1998	The overall goal of the National Environmental Policy is to achieve sustainable livelihoods and development for Lesotho. It focuses on the social and economic dimensions, the management and conservation of natural resources, and the promotion of community participation. The main objectives of the policy include securing for all Basotho a high quality of environment to enhance their health and well-being and using and conserving the environment and natural resources for the benefit of present and future generations, considering the rate of population growth and productivity of the available resources (GoL, 1998).	The policy objectives have a direct bearing to the issues of education Systems strengthening. The activities will result in the generation of E-Waste/Solid Waste and the management of this waste will be controlled by this policy.
2.	Environmental Management Plan guidelines for Environmental Impact Assessment 2010	The guidelines are designed to facilitate integration of environmental concerns in economic development from the earliest stages of project as required in the Environment Act of 2008. They are applicable to all listed projects, whether initiated by the public sector or the private sector. It Guides the developer in sustainably implementing a project, by adopting planning strategies that improve the quality of development.	The document promotes a holistic environmental management approach when taking conservation measures aimed to protect natural resources against degradation and soil loss which led to pollution of water and air. It is recommendable that BESP adopt these guidelines while developing and execution mitigations measures to enhance sustainable development. This approach will help to avoid interventions of short-term benefit and suffers other resources in the long term.
3.	Guidelines for Environment Impact Assessment in Lesotho (2010)	The guidelines facilitate compliance with the Lesotho's EIA process requirements by providing a step-by-step guide of how to carry out an EIA process. The guidelines are therefore aimed at integrating environmental concerns and economic development from the earliest stages of the project development (GoL, 2010).	The guidelines help to integrate environmental considerations into development planning, thereby promoting sustainable livelihoods and ensure that unwarranted negative impacts are avoided or mitigated at an early stage in the planning process. They were used as a framework for compiling this ESMF Report and will be applicable in the development of any environmental instrument that may be needed for the specific sub-project.
4.	Environmental Act of 2008	The Environment Act sets several environmental standards in relation to construction, including noise, air and soil standards. The Act specifies which projects require an Environmental Impact Assessment (EIA) or environmental monitoring, and what level of reporting is required. Sections 20, 21 and the First Schedule of the Environment Act provides for the EIA categories	The overall categorization of BESP on social and environmental impacts is Category B. In this category the programme may have some adverse environmental and social impacts which are site-specific and can be readily remedied by appropriate preventive actions and/or mitigation measures contained in this ESMP

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NO.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
		or level of EAs that will be required for particular projects.	
5	The Hazardous and Non-Hazardous Waste Management Act, 2008	<p>This Act covers all aspects of waste management, i.e., both the general or non-hazardous waste and the hazardous waste. It addresses E- waste, - both general and risk waste.</p> <p>The objectives of this Act are to make provision for the generation, transportation, storage, importation, exportation, recycling and disposal for both hazardous and Non-hazardous waste. It also makes provision for institutional measures for the control and management of hazardous and non-hazardous waste.</p>	Participating education facilities or institutions must comply with the requirements of this Act and handle all waste accordingly.

3.3.1.2 Education Laws

Table 3-3 is a summary of the relevant Education laws.

Table 3-3 Education Laws

NO.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
1.	The Education Act 2010	The education Act pursues the principle of provision of education to the people of Lesotho, by ensuring that every child is provided with opportunities and facilities to enable him to develop physically, mentally, morally, spiritually, and socially in a healthy, normal manner and in conditions of freedom and dignity accommodating all state of impairment.	While BESP build additional infrastructure (classrooms, latrines playgrounds) for provision of conducive learning environment it is critical to ensure that proper mitigation/rehabilitation measures are implemented at all construction sites. This will have the effect that the negative environmental impacts are restored
2.	National Policy for Integrated Early Childhood Care and Development (IECCD) 2013.	<p>Lesotho's Integrated Early Childhood Care and Development (IECCD) Policy aims to provide all Basotho children and their parents or guardians with equitable access to comprehensive, continuous, culturally appropriate, high-quality, participatory, and sustainable IECCD services, from preconception to five years of age (GoL 2013).</p> <p>The IECCD Strategy has, among others, focused on improving and expanding preconception, antenatal and neonatal services; ensuring vulnerable children with developmental delays, malnutrition, HIV and AIDS or disabilities receive early childhood intervention services.</p> <p>The policy is in line with the objectives of the current project of strengthening the nutrition and health of children and will enhance the issues of early childhood stimulation.</p>	

3.3.1.3 Local Government and Labour Laws

Table 3-4 Local Government and Construction Laws

NO.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
1.	Local Government Act No. 6 of 1997	The Act provides for the establishment of local authorities and for the purposes of local Government. Section 5 deals with the functions of the local authorities, which as contained in the First Schedule, list the relevant environmental protection considerations which include: Control of natural resources and environmental protection; Public health pertaining to refuse collection and disposal.	The local Government authorities are mandated to oversee the safe handling and disposal of both solid and liquid waste among other responsibilities. They approve and allocate sites for disposal of waste. It is important to consult with these local authorities for allocation of safe places for disposal of rubbles and other contaminants.
3.	Labour Code Act (2000 Amendment)	The labour code applies to any employment in the private sector and to any employment by or under the government, or by or under any public authority, while disciplined forces are exempt. It sets out provisions that cover a large spectrum of employer employee relationship. The provisions include among others, health, safety, and welfare at work; covers employment of women, young persons and children and provides for unfair labour practices and settlement of trade disputes.	The Labour Code sets extremely specific requirements for different classes of workers, contract and non-contract workers in the education and other sectors. It is critical that issues of workers are handled properly to avoid incidents of labour contentions leading to social disruptions, abandonment of work, posing a high risk to both society and the environment. In general, it lays down the rules on working conditions, in particular the protection of the health and safety of workers. Among other things, it states: employers' obligations, workers' rights, settlement of disputes, disputes of rights, code of good practice.

3.3.1.4 International Conventions and Treaties

Lesotho is a signatory and party to more than twenty-one international, conventions, treaties, and protocols. Of the many treaties, the following will be relevant to the Lesotho BEST project:

Table 3-5 Local Government and Construction Laws

NO.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
1.	International Law on the right to education	The Charter of the United Nations was signed on 26 June 1945, in San Francisco, at the conclusion of the United Nations Conference on International Organization, and came into force on 24 October 1945. Although the entire UN Charter does not expressly state the right to education, Article 55 gives a broad view on the realization of socio-economic rights, the right to education being one of them.	The whole BESP programme is geared at fulfilling the requirements of this convention by stepping in and improving student retention and teaching quality ⁵ in junior secondary schools in targeted regions of Lesotho and piloting a new curriculum to strengthen ECCD service delivery. The project will not be able to address all the constraints that limit the efficiency and productivity of the basic

⁵ Teaching quality under this project refers to teacher content knowledge and pedagogical skills in Mathematics and Science.

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			education sector. It will adopt a needs-based targeting approach and address some of the persistent disparities in the system, by targeting districts with the highest dropout rates and children from the poorest households.
2.	African Charter on the Rights and Welfare of the Child (1990)	<p>The African Charter on the Rights and welfare of the Children (also known as ACRWC or Children's Charter) was adopted by the Organisation of African Union (OAU) in 1990 and was entered into force in 1999. ACRWC is a comprehensive instrument that sets out rights and defines universal principles and norms for the status of children.</p> <p>It recognises the child's unique and privileged place in African society and that African children need protection as well as special care. Thus, the project must operate within the provisions of the rights of the children.</p>	<p>The whole BESP programme is geared at fulfilling the requirements of this convention by stepping in and improving student retention and teaching quality⁶ in junior secondary schools in targeted regions of Lesotho and piloting a new curriculum to strengthen ECCD service delivery.</p> <p>The project will target districts with the highest dropout rates and children from the poorest households.</p>
3.	Convention on the Rights of the Child (CRC)	<p>The United Nations Convention on the Rights of the Child (CRC) is a human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children. The convention defines a child as any human being under the age of eighteen unless the age majority is attained earlier under national legislation.</p> <p>The Convention deals with child-specific needs and rights. It requires that the Nations that ratify this Convention are bound to it by International Law. Ratifying states must act in the best interest of the child. In all jurisdictions implementing the Convention requires compliance with child custody and guardianship laws as that every child has basic rights, including the right to life, to their own name and identity, to be raised by their parents within a family or cultural grouping, and to have a relationship with both parents, even if they are separated. Thus, the project must operate within the provisions of the rights of the children.</p>	<p>The whole BESP programme is geared at fulfilling the requirements of this convention by stepping in and improving student retention and teaching quality⁷ in junior secondary schools in targeted regions of Lesotho and piloting a new curriculum to strengthen ECCD service delivery.</p> <p>The project will target districts with the highest dropout rates and children from the poorest households.</p>
4.	Convention on the Elimination of All Forms of Discrimination against Women 1979	The Convention requires that all inter-related factors and forms of discrimination against women be they institutional, legal, or ideological, be identified and eliminated. CEDAW is an "anti-discrimination treaty", aiming to achieve the protection and promotion of women's rights as well as gender equality.	This convention facilitates the elimination of any form of discrimination against women in our societies and at workplace that should mean that all necessary arrangements are put in place to ensure women experience and enjoy equality in their lives.
5.	Protocol to prevent	This protocol is intended to prevent and combat human trafficking crime and facilitate international	It is critical that BESP execution of construction work by all contracted

⁶ Teaching quality under this project refers to teacher content knowledge and pedagogical skills in Mathematics and Science.

⁷ Teaching quality under this project refers to teacher content knowledge and pedagogical skills in Mathematics and Science.

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	suppression and Punish, Human Trafficking in Persons, especially women and children, 2003	cooperation against it. It emphasizes the need for an appropriate balance between crime control measures and measures to support or protect victims of trafficking. Its importance in EIA is to bring awareness to the contractor and community that crimes described as trafficking are dangerous to a human being especially girls and women.	parties should carefully observe the provisions of this convention. It should be expected that contractors do not hire or deploy any form of a forced labour as this contravenes the provisions of this convention, rather they should facilitate the elimination of human trafficking by reporting to relevant authorities of such contrary behaviours
6.	The Basel Convention, 22 March 1989.	<p>The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal aims to protect human health and the environment against the adverse effects of hazardous wastes. One of its major provisions is the reduction of hazardous waste generation and the promotion of environmentally sound management of hazardous wastes, wherever the place of disposal;</p> <p>The Basel Convention started to address e-waste issues since 2002 which include, among others, environmentally sound management; prevention of illegal traffic to developing countries and; building capacity around the globe to better manage e-waste</p> <p>The Basel Convention Technical Guidelines focus on reducing the impacts on health and the environment of hazardous wastes. This guideline focuses on, (i) a strict definition and classification of the relevant waste streams, (ii) the segregation at source of the waste and (iii) the access to the best available information for the identification of waste.</p>	<p>The activities of the Lesotho BESP project may result in end-of-life E-waste for electronic equipment like laptops and solar systems that will be provided by the project. The project has to make sure it handles these anticipated E-waste, battery waste and solid waste properly.</p> <p>E-waste is categorized as hazardous waste due to the presence of toxic materials such as mercury, lead and brominated flame retardants are considered as hazardous waste according to the Basel Convention.</p>

3.3.2 Review of The World Bank Environmental and Social Framework

The World Bank's Environmental and Social Framework consists mainly of the environmental and social policy with ten (10) Environmental and Social Standards that it uses to examine potential environmental and social risks and benefits associated with Bank lending operations. Appendix 2 gives a detailed description of the World Bank environmental and social Framework (ESF). The environmental and social standards are designed to avoid, mitigate, or minimize adverse environmental and social impacts of projects supported by the bank.

This Framework comprises:

- A Vision for Sustainable Development, which sets out the Bank's aspirations regarding environmental and social sustainability,
- The World Bank Environmental and Social Policy for Investment Project Financing, which sets out the mandatory requirements that apply to the Bank, and
- The Environmental and Social Standards, together with their Annexes, which set out the mandatory requirements that apply to the Borrower and projects.

The World Bank Environmental and Social Policy for Investment Project Financing sets out the requirements that the Bank must follow regarding projects it supports through Investment Project Financing.

The Environmental and Social Standards (ESS) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will:

- (a) support Borrowers in achieving good international practice relating to environmental and social sustainability,
- (b) assist Borrowers in fulfilling their national and international environmental and social obligations,
- (c) enhance non-discrimination, transparency, participation, accountability, and governance, and
- (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

The following is a summary of the Standards that are relevant to the Project.

Table 3-6 Relevant World Bank Environmental and Social Standards (ESSs).

No.	WORLD BANK ESSS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
1.	ESS1: Assessment and Management of Environmental and Social Risks and Impacts		✓	<p>ESS1 sets out the Borrower's responsibilities for assessing, managing, and monitoring environmental and social risks and impacts associated with each stage of project supported by WB through Investment Project Financing, to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).</p> <p>The need for the project to have experienced Environmental Specialist and Social Specialist to undertake environmental and social assessments and monitoring during project preparation and implementation phase. This ESMF has been prepared through the scoping of key environmental and social risks and impacts of the Project and identified appropriate mitigation measures to be implemented. Additional E&S plans have been prepared to manage project specific risks and impacts namely:</p> <ul style="list-style-type: none"> i) Environment and Social Management Plan, ii) E-Waste Management and Disposal Plan, iii) OHS requirements for project workers and suppliers, iv) Pre-opening School Audit Checklist (Annex iv), v) Grievance Redress Mechanisms (section 8.0), and vi) GBV/SEA and Child Protection Prevention & Response Action Plan, <p>The project shall obtain as appropriate, the necessary permits, consents and authorizations that are applicable from relevant national authorities.</p>

2.	ESS2: Labour and Working Conditions		√	<p>ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. This standard promotes fair treatment of project workers as well as provision of safe and healthy working conditions.</p> <p>The ESMF includes a review of relevant Lesotho workplace and labour legislation/policies and as well as the MoET policies and procedures. The site specific ESMPs will include appropriate recommendations consistent with Lesotho standards and World Bank ESS2 related to labour management, labour influx management, Gender Based Violence (GBV), Workplace Sexual Harassment (WSH), which will be documented in Labour Management Procedures to be included in the ESMPs.</p> <p>The activities supported by the project shall be conducted by MoET staff in all the ten Districts of the country. There will be limited contractual workers and primary suppliers who will be recruited by the Government to perform specific roles namely: the installation of ICT equipment at MoET facilities. The contracted workers and primary suppliers will be orientated on and sign a code of conduct (COC) on expected behaviour and safety standards including GBV risks. This has been outlined in a Labour Management Procedures prepared for the project.</p> <p>In line with ESS2 as well as the Lesotho law, Child labour, forced labour or conscripted labour shall not be used in the project.</p> <p>Civil servants from the implementing ministries working in the project full-time or part-time will remain subject to the terms and conditions of their existing public service employment or agreement unless there has been an effective legal transfer of their employment or engagement in the project.</p> <p>The project has prepared a responsive GRM to allow workers to quickly inform their immediate management of labour issues, such as a lack of PPE and unreasonable overtime. They will also be at liberty to use the project GRM among other measures for seeking recourse.</p> <p>The LMP will include a workers' GRM for labour disputes and to allow workers to quickly inform their immediate management of labour issues, such as a lack of PPE and unreasonable overtime. They will also be at liberty to use the project GRM among other measures for seeking recourse.</p> <p>The National Labour Code and related amendments cover many of the principles included in ESS2. Measures for prevention and mitigation of GBV/SEA risks involving project workers will be put in place before project effectiveness. The LMP will include requirements for preparation of OHS plans and the proposed Project's OHS requirements will align with the Bank's General Environment, Health and Safety Guidelines (EHSGs), the industry sector EHSGs for the Education Sector and other good international industry practice (GIIP).</p>

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3.	ESS3: Resource Efficiency and Pollution Prevention and Management		√	<p>ESS 3 sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle.</p> <p>The proposed Project is not expected to be a significant user of water or generate significant greenhouse gas emissions. However, Water and electric energy are scarce in the remote mountainous areas. The project will need to come up with efficient production and energy consumption technologies to preserve the scarce energy resources.</p> <p>The project will include the procurement of ICT equipment to be installed at the MoET virtual meeting room. This will involve the use of energy and generation of end-of-life E-waste from the provided computers, laptops, solar panels and battery packs; thus, there will be a need to ensure efficient energy consumption and adequate management of the end-of-life electronic waste, respectively.</p> <p>In terms of efficiency, the project should ensure that the equipment procured is energy efficient to the extent possible. For any ICT equipment that may be replaced should be disposed of in compliance to the Hazardous and Non-Hazardous Waste Management Act, 2008. A Waste Management Plan has been prepared to ensure all waste generated are handled in environmentally sound manner.</p>
4.	ESS4: Community Health and Safety		√	<p>ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts.</p> <p>No irreversible community health and safety impacts are anticipated for the project, however, ESS4 is applicable as the Project activities are expected to cause some health and safety risks and impacts to local communities.</p> <p>The influx of labour could also expose local communities to public health risks and communicable diseases, such as HIV/AIDS. The project activities can also cause Sexual Exploitation and Abuse (SEA).</p> <p>Lesotho has made efforts to attain gender equity and equality, but legislation, cultural norms and practices still contains considerable gaps and GBV incidents are common. The GBV risk for the project is therefore contextual and while it is not expected that the project will heighten GBV risks, it should adopt procedures set out in the Good Practice Note on addressing GBV. Specifically, the PFU will be trained in addressing GBV throughout the Project. GBV prevention and response will be mapped out, and GBV actions will form part of the ESMF/ESMP and stakeholder consultations. These requirements will also apply to all contractors and be specified in related procurement.</p> <p>The project will ensure the avoidance of any form of GBV based on the GBV Action Plan prepared for this project and attached in Annex VI.</p>
5.	ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	X		<p>ESS5 in reference to permanent resettlement or land acquisition is not considered relevant. Activities that will lead to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement will be excluded from financing or managed as per the Standard requirements.</p> <p>The ESMF will outline screening procedures with community participation to ensure avoidance of adverse livelihood impacts. The site-specific Environmental and Social Management Plans (ESMPs) will be</p>

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				prepared and implemented in each facility/school/ECCD centre during Project implementation.
6.	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	X		ESS6 is not considered relevant, no project activities are expected to have impact to the natural habitat and ecosystem services.
7.	ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	X		ESS 7 is not considered relevant to the Project as there are no groups in Lesotho meeting the criteria as set out in ESS.
8.	ESS8: Cultural Heritage	X		ESS8 is not considered relevant, no project activities are expected to have impact to the tangible or intangible cultural heritage.
9.	ESS9: Financial Intermediaries	X		Project activities do not envision the use of financial intermediaries.
10.	ESS10: Stakeholder Engagement and Information Disclosure		√	<p>ESS10 recognizes the importance of open and transparent engagement between Borrower and project stakeholders as an essential element of good international practice.</p> <p>A key risk and impact under this standard relate to inadequate, ineffective and/or inappropriate stakeholder and community engagement and disclosure of information leading to exclusion of truly vulnerable, marginalized and minority members of the community from project benefits, amplified by the limited resources available under the project to do meaningful community engagements.</p> <p>The project has prepared a structured approach to engagement with stakeholders (the SEP) that is based upon meaningful consultation and disclosure of appropriate information.</p>

The social risk rating for the proposed Project is considered Moderate. The project footprint is small with limited and manageable adverse social impacts that can be mitigated and managed with the application of appropriate mitigation measures.

The activities at each sub-project site have a moderate potential of impacting on the environment and as such each sub-project must be screened for potential environmental and social impacts and then a site specific environmental and social management plan (ESMP) must be prepared and implemented for mitigating the potential risks that would have been identified in the screening.

3.3.2.1 World Bank Environmental Health and Safety Guidelines (EHSG)

The Environmental Health and Safety Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice (GIIP).

The general EHSG contain information on cross – cutting environmental, health, and safety issues potentially applicable to all industry sectors and covers the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. Application of the EHSG to existing facilities may involve the establishment of site-specific targets, with an appropriate timetable for achieving them. The applicability of the EHSG. The general EHSG cover the following issues:

- Environmental Safety,
- Occupational Health and Safety,
- Community Health and Safety, and
- Construction and Demolishing.

The effective management of environmental, health and safety issues during the implementation of the BESP will entail the inclusion of these EHS considerations into the planning as well implementation of the project.

3.3.3 Comparison of Lesotho, and World bank Project Classification

3.3.3.1 Lesotho legislation

The Lesotho legislation classifies projects and activities into three categories as follows:

Category 1: projects under this category **are not listed in the Schedule** and are unlikely to cause any significant environmental impact and thus do not require any additional environmental assessment.

Category 2: projects under this category **are listed in the Schedule** and are likely to cause environmental impacts, some of which may be significant unless mitigation actions are taken. Such projects cause impacts which are relatively well known and easy to predict. Also, the mitigation actions to prevent or reduce the impacts are well known. From the assessment of the Project Brief the projects are classified as not requiring a full EIS.

Category 3: projects under this category **are listed in the Schedule** and are likely to have significant adverse environmental impacts whose scale, extent and significance cannot be determined without in-depth study. Appropriate mitigation measures can only be identified after such study. From the assessment of the Project Brief the projects are classified as requiring a full EIS.

3.3.3.2 The World Bank

The World Bank requires that all projects financed by the Bank are screened for their potential environmental and social impacts to determine the appropriate extent and type of

environmental and social work. The Bank through the Environmental and Social Framework (ESF) classifies the proposed projects into one of four categories as follows.

Table 3-7 outlines the Project Environmental and Social Risk Classification (ESRC) according to levels and nature of impacts. In addition to the level and nature of impacts, other issues are also taken into account in determining the appropriate risk classification/ ESRC and they include: type, location, sensitivity, scale of project, capacity and commitment of the Borrower(s).

Table 3-7 Project Environmental and Social Risk Classification (ESRC) .

CLASSIFICATION	DEFINITION
High Risks	Projects encompassing sub-project or activities with potential significant adverse environmental or social risks/ impacts that are diverse, irreversible, or unprecedented. Examples of these activities includes project affecting sensitive ecosystems services, project with large resettlements components, projects with serious occupational and health risks, projects with poses serious socio-economic concerns. These impacts may affect an area broader than the sites or facilities subject to physical works.
Substantial risks	Projects whose activities have some potentially adverse environmental and social impacts on human populations or environmentally important areas – including wetlands, forests, grasslands, and other natural habitats – though less adverse than those of “High Risk” projects. These impacts are site – specific, few if any of them are irreversible; and in most cases mitigation measures can be designed more readily than for “High Risk” projects.
Medium risks	Projects with activities with potential limited adverse environmental or social environments and social risks and or impacts that are few in numbers, generally site specific, largely reversible, and readily addressed through mitigation measures. Examples of these projects include small scale agricultural initiative, schools and hospital construction, forest management activities, low emission energy project.
Low risks	Projects with activities with minimal or no adverse environmental and social risks and or impacts. Example of these projects or activities include education and training, public broad casting, health, and family planning, monitoring programmes, plans and studies and advisory services.

The Bank requires that all projects be screened, and the requisite environmental and social assessment work be carried out based on these screening results. To ensure that future small scale sub-projects are implemented in an environmentally and socially sustainable manner the bank has developed an environmental and social screening process for small scale sub-projects consistent with ESS1.

While Lesotho’s EA procedures are generally consistent with the Bank’s Standards, there are some gaps regarding the screening of sub-projects where the sites and potential adverse localized impacts cannot be identified prior to the appraisal of the project. Therefore, under the Lesotho BEP the environmental and social screening processes as described in this report will be used. Table 3-3 describes the gap analysis and comparison of World Bank and Lesotho environmental and social assessment procedures.

Table 3-8 Comparison between Bank and Lesotho ESA procedures

Subject/ Issue	World Bank Policy	Lesotho Policy	Solution/mitigation
EIA process	Environmental Assessment (EA) work is initiated as early as possible in project processing and is integrated closely with the economic, financial, institutional, social, & technical analyses of all proposed projects.	Only projects classified as category 3 require EIS	EIA should be initiated as early as possible in project processing to inform design of all projects
Screening Criteria	The Bank’s project screening criteria group projects into three categories depending on the severity of impacts: <ul style="list-style-type: none"> High Risk – Detailed Environmental Assessment, 	Only projects classified as category 3 require full EIS	Lesotho BEP is classified as Medium Risk under World Bank’s screening criteria and is required to prepare an overall ESMF and site specific ESMPs for sub-projects.

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	<ul style="list-style-type: none"> • Substantial Risk – Initial Environmental Examination, • Medium Risk - • Low Risk – Environmentally friendly. 		
	ESMF used for screening of sub-projects where the sites and potential adverse localized impacts cannot be identified prior to the appraisal of the project.	No Provision for screening of sub-projects where the sites and potential adverse localized impacts cannot be identified prior to the appraisal of the project.	Lesotho BSP will use the environmental and social screening process as described in this ESMF.
Environmental and Social Management Plans (ESMPs)	ESMPs are required for each set of activities (e.g., sub-projects) that may require specific mitigation, monitoring and institutional measures to be taken during implementation.	In addition to EIS for category 3 projects, no other plans are prepared	ESMPs will be prepared for each sub-project to be financed under Lesotho BSP and will include specific mitigation, monitoring and institutional measures to be taken during implementation
Disclosure	World Bank requires ESIA reports to be: <ul style="list-style-type: none"> a) disclosed for written comments from the various agencies and government agencies. b) notify the public of the place and time for its review and c) solicit oral or written comments from those affected. 	EIS reports are available for public consumption at EAD upon completion but are not circulated for written comments from the various agencies and public	Upon completion of ESIA reports, these must be: <ul style="list-style-type: none"> a) circulated for written comments from the various agencies and government agencies, b) notify the public of the place and time for its review, and c) solicit oral or written comments from those affected. d) Reports will be disclosed in-country and on the World Bank's external website.

3.4 INSTITUTIONAL FRAMEWORK

The following sections outline the institutional framework which has been broken down into three: i) the capacity of the BEST PFU to implement the requirements of the ESMF, ii) the ESMF Implementation Arrangements covering the functions of the Environmental and Social Specialist (ESS), and iii) the Institutional Arrangements, covering how the different institutions (MoET, MoSD, and partners) will be implementing the ESMF. This has been outlined per component.

3.4.1 Capacity of BEST PFU

The Ministry of Education and Training (MoET) has experience in implementing World Bank funded projects under the Safeguard Operational Policies, namely, the Lesotho Education Quality Enhancement Project (LEQEP) and Lesotho Basic Education Improvement Project (LBEIP). The proposed Project will be implemented through the existing LEQEP Project Facilitation Unit (PFU). The PFU will have the overall responsibility for environment and social risk management including monitoring compliance with the agreed-on mitigation measures and actions that are outlined in the project Environmental and Social Commitment Plan (ESCP).

Over the course of implementing both projects, the MoET has demonstrated moderately satisfactory implementation and monitoring of environmental and social Safeguards Operational Policies. Currently, the PFU does not have a dedicated qualified and experienced Environmental and Social Specialist (E&S Specialist). Given the expanded scope

of the Environmental and Social Framework (ESF) and the MoET unfamiliarity with the ESF, the MoET will need training in the Bank's Environmental and Social Standards (ESSs) to ensure that the project will be implemented in accordance with the Bank's ESF requirements. In addition, the Bank will provide MoET capacity building and intensive support for environmental and social risk management during preparation and implementation phases of the Project to comply with ESF requirements.

The PFU may need a dedicated E&S Specialist who will be responsible for implementing and monitoring the Environmental and Social Management Framework (ESMF), potential Labour Management Procedures (LMP), Stakeholder Engagement Plan (SEP), GBV/SEA risk mitigation measures and the operation of the Grievance Redress Mechanism (GRM). The client's capacity will further be assessed before project implementation and capacity gaps will be filled through implementation of the ESCP. Significant effort is anticipated to build the capacity of the MoET and the PFU at both national, district and community levels with respect to the ESF and its applicable Standards.

3.4.2 ESMF Implementation Arrangements

BESP MoET and MoSD PFU will engage an Environmental and Social Specialist (ESS) to complement in the implementation of the Environmental and Social Management Framework (ESMF). He/she will also be responsible for the implementation of the SEP and GRM.

The ESS will be based at the MoET PFU head office and will be supported by District Technical Teams in the Districts, headed by the MoET and consisting of:

- MoET – District Education Officers
- MoSD – Social Welfare Officers.
- MoTEC – District Environment Officers
- MOLGC - District Administrators Office

The District Education offices will select sub-projects (participating Schools) with the assistance of the District Technical Teams. Figure 3-1 depicts the organisational chart indicating the responsibilities of the teams at district levels.

At MoET Headquarters, the PFU through the ESS will concentrate on the planning, supervision, reporting and support to District Technical Teams.

At each District office, the District Technical Teams will coordinate all environmental and social safeguards issues and oversee the implementation of the ESMF, SEP and GRM under the oversight of the ESS. The District Technical teams led by the District Education Managers will help the participating schools in preparing their sub-projects applications to avoid or minimize adverse environmental and social impacts. The Technical Teams will assist to screen the sub-projects and develop site specific checklist-ESMPs (Appendix 1). for the sub-projects that will require them.

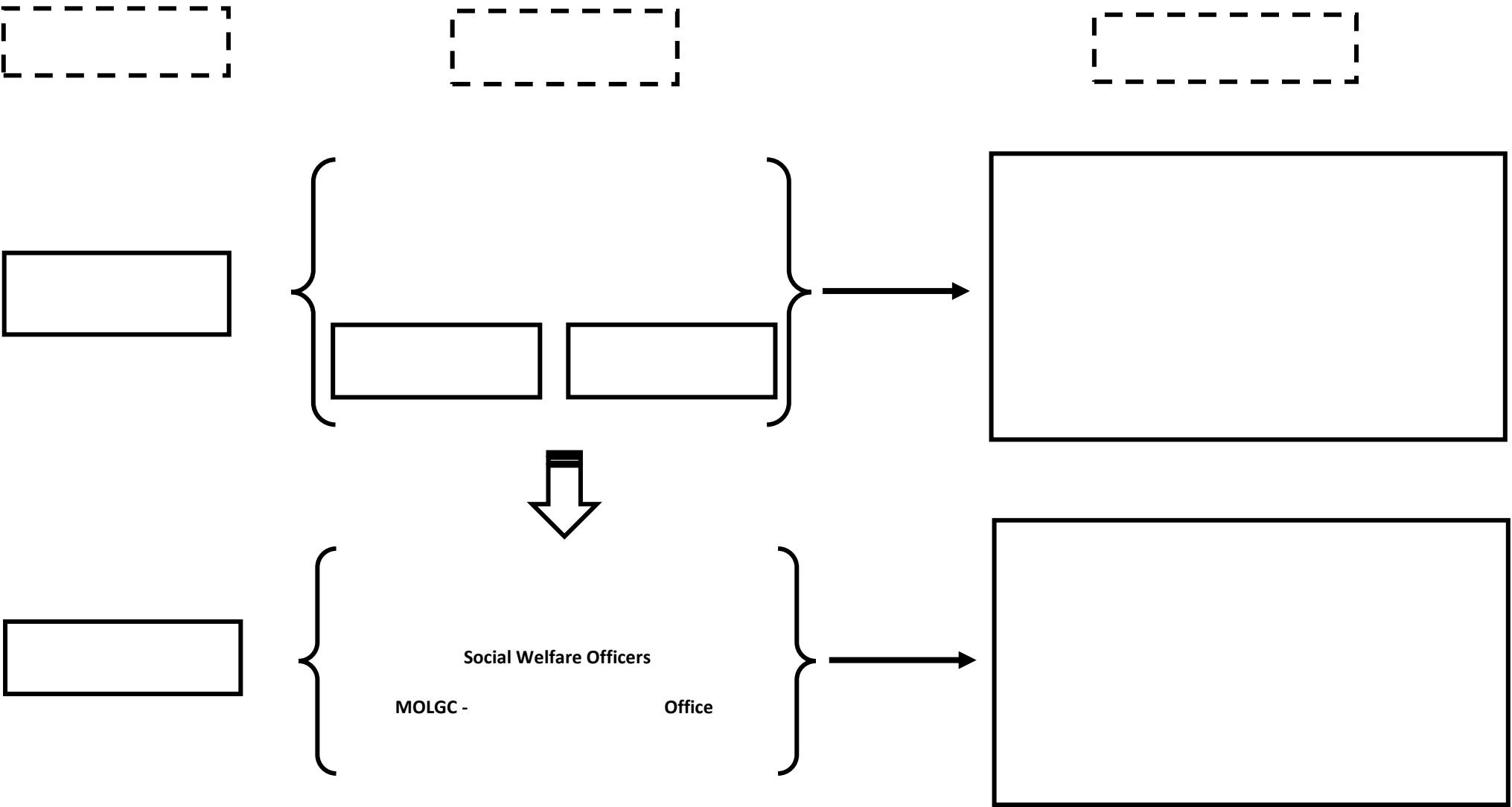


Figure 3-1 Organizational Chart for Safeguards Responsibilities.

4. POTENTIAL ENVIRONMENTAL & SOCIAL IMPACTS & MITIGATION MEASURES

4.1 INTRODUCTION

This chapter outlines the environmental and social screening process for the project, impact identification and the possible mitigation approaches that can be employed. Since the actual project sites are yet unknown, potential impacts described below are general and serve as a guideline for a thorough assessment once the sites have been selected.

4.2 ENVIRONMENTAL AND SOCIAL SCREENING

This section outlines the stages of the environmental and social screening process (the screening process) leading towards the review and environmental approval of any sub-project that will be undertaken on the BESP. To facilitate environmental and social screening, the ESMF has provided a checklist (Environmental and Social Checklist; Appendix 1) for subproject screening that will assist stakeholders, proponents and project staff with the identification of environmental and social issues relating to the subproject location and the surrounding environment based on available knowledge and field investigations.

4.2.1 Environmental Screening

This initial screening will be carried out using the Environmental and Social Checklist (Appendix 1). The participating Education Facilities/Schools will identify their sub-projects and will be responsible for the environmental and social screening of the sub-project (Figure 6-1). The MoET PFU Environmental Specialist will give overall guidance in the screening process approving or rejecting ultimately, whilst the District Education Officers (Together with his District Technical Team) will conduct the screening (i.e., filling out the form and doing the on-site evaluation) for the Education Facilities/Schools.

The screening will be conducted to identify the possible site-specific impacts and safeguard issues associated with a particular activity. Each type of activity at a particular location should have its own screening form. The initial stage is a desk appraisal of the activities planned, including designs.

The screening process will be carried out by the Provincial/District Technical teams as outlined above (Also see section 3.4.2). This initial screening will be carried out using the Environmental and Social Checklist (Appendix 1). Completion of the Checklist will facilitate the identification of potential environmental and social impacts, determination of their significance, assignment of the appropriate environmental and social category, identification of appropriate environmental and social mitigation measures, determine if any further environmental and social work is necessary. The Environmental and Social Screening Process is outlined in Figure 4-1 below. Once drafted, the MoET PFU Environmental Specialist will review the Screening Form before any more work is done just in case the activity is not eligible or does not contain the necessary information.

The extent of further environmental and social work required to mitigate adverse impacts for the sub-projects, will depend on the outcome of the screening process. Most of the sub-projects will adopt the ESMP in the ESMF and will only be required to complete the environmental and social Checklist (Appendix 1) at the subproject selection/identification prior to commencement of subproject implementation.

A few sub-projects may require further EA work and the development of site specific ESMPs. The ESMP-checklists (Appendix 6) will specify potential adverse environmental and social impacts and mitigation measures. Within the ESMP checklists, the Environmental Monitoring Plans will be prepared for each subproject, where monitoring indicators, timing, methods, and institutional responsibilities will be specified.

Once all the requisite documentation has been compiled, the District Technical Team will make recommendations to the National Level for approval.

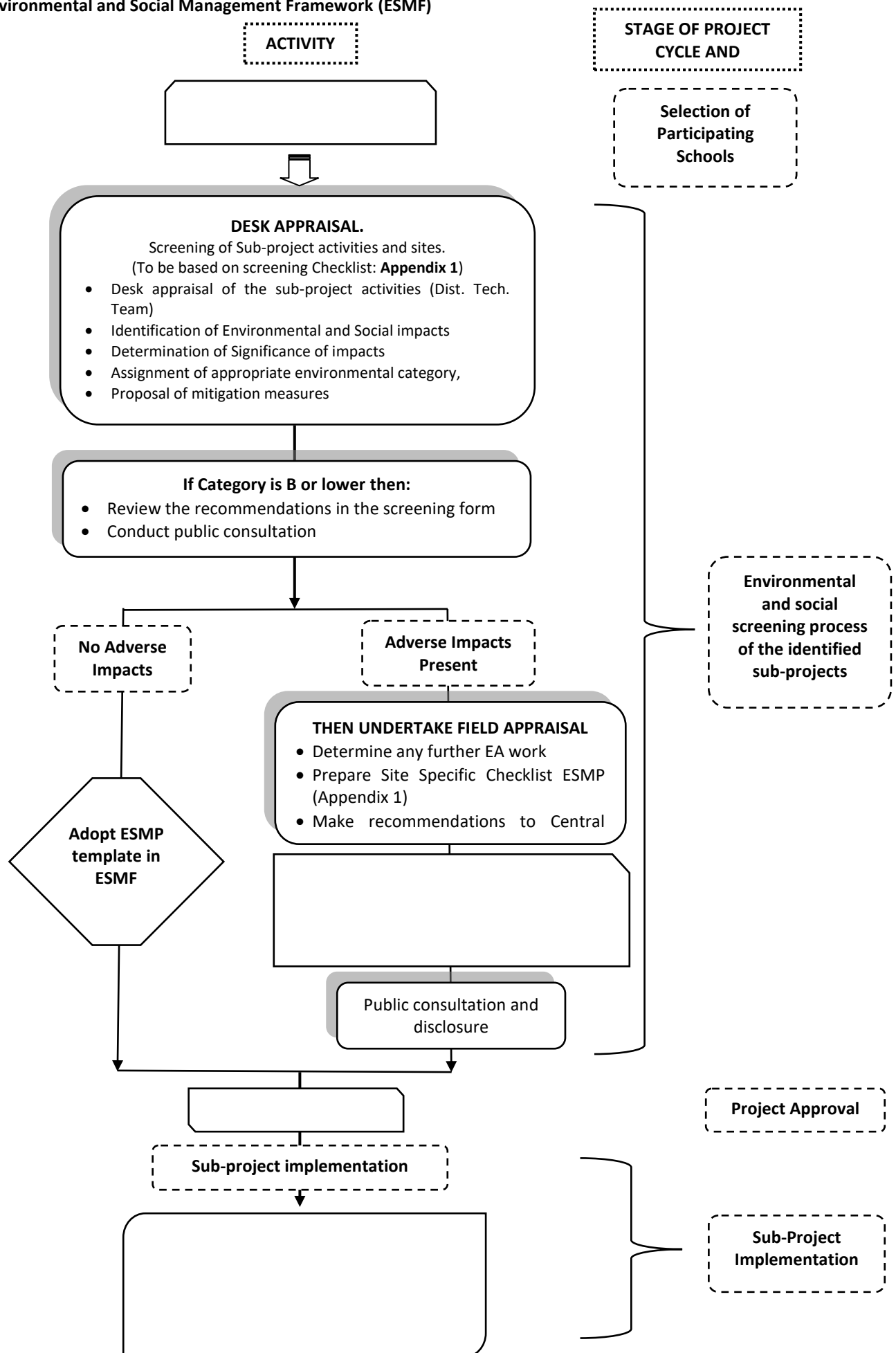


Figure 4-1 Flow for sub-projects identification, submission, evaluation and monitoring.

4.2.2 Appraisal and Approval of Environmental and Social Work

The completed screening form along with any additional planning reports, will be forwarded to the review authority (Evaluations Committee), which is the Ministry of Education and Training at National Level, represented by the MoET PFU Environmental Specialist. The Sub-projects which do not require the preparation of an in-depth ESMP will automatically be approved based on the screening form and the project implementor, usually the contractor, is required to develop site-specific ESMPs for every activity based on its screening together with the requirements of this ESMF as its safeguards instruments. However, if the sub-project requires the development of an in-depth ESMP, then the review team (Evaluations Committee) will be assisted by Environmental experts from the Environment Department to make sure that all the requirements are in place and submitted to Environment Department for updating its records and making sure that the ESMP is aligned to the main ESMF. Such a sub-project may also require a no objection from the World Bank. All the documentation must be submitted to the MoET PFU Environmental Specialist who will then submit to Environment Department head office when satisfied that all documentation is in place.

Generally, all the sub-projects that will be financed by BESP will not need any further EA work beyond just an ESMP checklist to guide the implementation of the ESMF. So, no further Environment Department approvals will be required, unless, for example, a major systems installation is envisaged.

4.3 ENVIRONMENTAL AND SOCIAL RISK CLASSIFICATION (ESRC)

4.3.1 Environmental Risk Rating:

The environmental risk classification for the proposed Project is low. This is mainly because the proposed Project is expected to have generally positive environmental impacts and components are not anticipated to result in any substantial or irreversible impacts as the project will not support any construction activities. Overall, the project activities are focusing on capacity building type of activities including supporting a cash transfer scheme for students from poor households; youth groups; piloting and evaluating the new ECCD curriculum and mapping of ECCD providers; as well as project management support. The Project will not support development of any physical infrastructure.

Under Sub-component 1.3: Strengthening online training models in Mathematics and Science for junior secondary school teachers, there will be procurement of some ICT hardware (laptops) to scale up ongoing online teacher training initiatives, and there will be procurement of portable solar panels for teachers who do not have access to electricity at schools. The repairs, servicing and end-of-life disposal of ICT equipment and solar panels may result in environmental risks related to electronic wastes (e-wastes), hazardous waste and solid wastes if not managed appropriately. Environmental best practices shall be in place for managing repairs and end-of-life disposal of ICT equipment and solar panels involved in the online training program.

Generally, the project activities are not expected to have any major adverse impact on the environment and human health. No long-term or irreversible adverse impacts are expected from project implementation. The potential adverse environmental impacts are minimal and there are no significant adverse risks which are complex, diverse, sensitive, or unprecedented. The

following Standards will be particularly relevant to address environmental risks of the Project -- ESS 1, ESS2, ESS3, and ESS 10.

4.3.2 Social Risk Rating:

The social risk rating for the proposed Project is considered Moderate mainly because:

- (i) There will be no civil works, which means that there will be no risks or impacts associated with ESS5 such as physical or economic displacement,
- (ii) based on the Bank's GBV/SEA/SH country-level risk assessment rating, the social risks of Sexual Exploitation/Harassment and GBV are rated as moderate, and
- (iii) the project will not directly or indirectly cause or contribute to any of the pre-existing social issues related to gender-based violence but will attempt to ultimately contribute to their mitigation through improving educational outcomes and school retention rates for girls and boys.

Nonetheless, there is a possibility of contextual risks of GBV and there is need to uphold safe environment at schools and implement the GBV Action Plan in this ESMF. The social risks emanate mainly on two fronts: (1) limited E&S capacity of the PFUs within MoET and MoSD; and (2) ensuring appropriate engagement with local communities and other relevant stakeholders (including with most vulnerable and disadvantaged groups and ensuring their genuine stakeholder participation in decision-making processes of the project (especially those related to cash transfer sub-component). The following Standards will be particularly relevant to address social risks-- ESS 1, ESS2, ESS4, and ESS 10. The Project does not pose any social risks associated with ESS7.

4.4 INCORPORATION OF IDENTIFIED RISKS INTO THE ESCP

BESP has developed Environmental and Social Commitment Plan (ESCP) which sets out the material measures and actions required for the project to meet the requirements of the ESSs as outlined in the project ESMF. The ESCP outlines the environmental and social risk management responsibility of BESP which includes monitoring compliance with the agreed-on mitigation measures and actions. This will include compliance that has to be included in contracts for any suppliers and contractors.

BESP will implement the measures and actions identified in the ESCP diligently, in accordance with the timeframes specified in the ESCP, and review the status of implementation of the ESCP as part of its monitoring and reporting.

BESP will also prepare, submit to the Bank for approval and implement a process that allows for adaptive management of proposed project changes or unforeseen circumstances. The agreed adaptive management process is set out in the ESCP and specifies how such changes or circumstances are to be managed and reported, and how any necessary changes will be made to the ESCP and the management tools used by BESP. This will include unforeseen circumstances which may be revealed by site-specific Checklist ESMPs.

4.5 ENVIRONMENTAL AND SOCIAL IMPACT ANALYSIS

Taking into considerations the proposed project activities, the potential environmental and social impacts were then identified through a comprehensive consultation process.

4.5.1 Environmental Impact Analysis

i. Environment Degradation

a) ***Increased generation of e-waste, hazardous waste, and solid wastes.***

Under Sub-component 1.3 there will be procurement of laptops and solar panels, and the repairs, servicing and end-of-life disposal of the ICT equipment and solar panels may result in environmental risks related to electronic wastes (e-wastes), hazardous waste and solid wastes if not managed appropriately. These will need to be managed carefully to prevent public health risk and environmental impacts.

4.5.2 Social Impact Analysis

i. Institutional support and Programme management and coordination.

- ###### a) **Fragmented project approach:**
- A fragmented planning, implementation and monitoring approach at national, district and local level affects sustainability of a project. There may be some stakeholders at national and district level who are i) not aware ii) who doubt their role in the project and iii) who feel that their role is being played by another stakeholder. This results in uncertainties, suspicion, and conflict.

Coordination mechanism must be in the project design and should be spelt out at inception stage outlining clear roles and responsibilities for each stakeholder. This must be a consultative exercise to allow dialogue especially where roles may seem to clash. For example, the role of MoET and MoSD must be spelt out. The Lead Agency (MoET) and the PIU should lead this activity.

b) ***Limited Stakeholder Participation***

The level of participation of all relevant stakeholders during project planning and designing is of paramount importance as a buy in process. Unclear roles and responsibilities and inadequate information may lead to limited participation of critical Government ministries and departments at national, provincial and district level.

Communities are used to top-down approaches where projects are just handed over to them without their initial consent. This poor stakeholder participation will result in the lack of ownership of the project by the locals, poor participation in project implementation and low chances of sustainability of the project.

c) ***Poor Project Inception, Anxiety and Anticipation***

The planning stage brings a lot of anxiety and anticipation as most stakeholders do not know exactly what will happen and when it will happen. Lack of proper plan of action with timelines and full disclosure creates anxiety among stakeholders. They hold the whole process with suspicion and do not want the planning phase to drag for too long. This mostly results in the locals not fully cooperating with the project preparation team and not disclosing all the relevant information during consultations.

d) **Targeting**

When there are no clear selection criteria of project beneficiary areas and communities' conflict may arise. Failure to recognise/appreciate local community

definitions (explicit and implicit) of vulnerability is likely to create conflict with and among community members as well as perpetuating gender inequalities.

e) Gender Based Violence (GBV)

There are high chances of sexual exploitation (in its various forms) of poor women and young girls by construction workers and project implementation personnel. If not well controlled, there could be rampant exploitation of women and youths at the marketplace as well. Assessment of exposure and appropriate preventive actions must be carried out to avoid gender-based violence at all costs.

4.5.3 Significance Rating of Potential Environmental and Social Impacts

The objective of significance rating is to identify areas where there is the biggest potential of impacting on the environment and then focusing attention on these to reduce the impacts. The method that will be employed for significance rating looks at three parameters, magnitude, duration, and probability. It looks at the likelihood of the aspect occurring. It then looks at how severe the impact on the environment will be the scale of the impact, how long it will last for or whether the impact is reversible.

The significance of the adverse impacts from project activities will be rated based on their magnitude, duration and probability using the significant rating tables in appendix 8. The scales of rating are 1 to 5 with 1 being low and 5 being high. Where an aspect is affected by more than one impact, the highest rating is taken as the applicable significance of the impact. The ESMP in section 5.6 only considers the impacts that have been rated moderate and high significance as these present impacts that need attention. The significance ratings are in line with the significance ratings table in appendix 8, where the magnitude = Probability + Severity + Extent + Duration

Table 4-1 Magnitude of the impacts.

Magnitude		Effect on Environmental and Social Processes
Negligible	< 6	Not Serious: Changes are barely perceptible.
Low	6-12	Acceptable but Undesirable.
Moderate	13-17	Very Serious:
High	>17	Totally Unacceptable.

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Table 4-2 Significance Rating of Potential Social Impacts

REF:	PARAMETER UNDER CONSIDERATION			CRITERIA FOR ASSESSMENT OF POTENTIAL IMPACT					
	CATEGORY	CAUSE	IMPACT	QUALITY	PROBABILITY	SEVERITY OR SIGNIFICANCE	SCALE	DURATION	MAGNITUDE OF IMPACT
1.0	Significance Rating of Potential Environmental Impacts								
1.1	E-Waste Generation	<ul style="list-style-type: none"> Waste generated from end of life of laptops, solar panels, etc. 	<ul style="list-style-type: none"> Potential for Hazardous waste pollution. Littering and indiscriminate dumping of solid waste E-waste pollution. 		2	2	2	4	10 (Acceptable but Undesirable)
2.0	Significance Rating of Potential Environmental Impacts								
2.1	Limited Stakeholder Involvement	<ul style="list-style-type: none"> Inadequate dissemination/sharing of information. Unclear roles and responsibilities Predominance of the top-down approach. Negative perception 	<ul style="list-style-type: none"> Low chances of success and sustainability Failure to take up ownership of the project 		4	2	4	2	12 (Acceptable but Undesirable)
2.2	Poor project Inception/Introduction	<ul style="list-style-type: none"> Lack of transparency from the Authorities Lack of proper timelines for the different phases of the project Dragging the planning 	<ul style="list-style-type: none"> Anxiety and anticipation Limited cooperation Suspicion and hence concealing important of information. 		2	1	1	1	5 (Not Serious)

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[illegible]

4.6 THE ENVIRONMENTAL MANAGEMENT PLAN (ESMP)

The proposed mitigation measures for the Lesotho BESP Project (Table 4-3), provides guidelines for the management of potential environmental and social aspects at all possible sub-project sites. The mitigation or enhancement measures will reduce the negative impacts and enhance the positive impacts. The identified impacts and their mitigation measures will be used in the preparation of site specific environmental and social management plans (ESMP) and a Template for Environmental and Social Management Plan is included as an Appendix 6.

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Table 4-3 Mitigation measures for the identified risks

no.	project components	potential environmental, and social impacts	main mitigating actions	responsibility for implementation
1.0	Component 1: Improving the retention of students in junior secondary education. This component will focus on improving the retention of students in junior secondary education.			
	Subcomponent 1.1: Improving the efficiency of cash transfer schemes for students from poor households BESP will leverage the Orphans and Vulnerable Children's bursary (OVC-B) and the Child Grant Program (CGP), to improve student retention at the secondary level. It will use the CGP and OVC-B programs to improve student retention, by addressing two critical bottlenecks in the basic education system: <ul style="list-style-type: none"> • <u>Transition from primary to junior secondary.</u> The proposed project will use the CGP, to support and motivate households to keep their children in schools as they complete primary education by providing a bonus payment upon transitioning. • <u>Continued enrolment and attendance at the junior secondary level: Component wants to ensure that</u> students can stay in school and complete their secondary education. 	<ul style="list-style-type: none"> ▪ Increased attendance due to the intervention may expose girls and boys to added SEA risks. • Limited sustainability of cash transfers can lead to recipients dropping out and facing higher risk of early marriage or other types of exploitation 	<ul style="list-style-type: none"> ▪ Train teachers and head teachers on GBV/SEA risks to protect their students from GBV/SEA. ▪ Focus group/engagement with parents to understand risks of GBV/SEA and potential mitigation measures. 	MoET MoSD PFU
	Subcomponent 1.2:	<ul style="list-style-type: none"> • GBV/SEA risk that might emerge due to 	<ul style="list-style-type: none"> ▪ PFU conducts focus group interviews with 	MoET

Environmental and Social Management Framework (ESMF)

no.	project components	potential environmental, and social impacts	main mitigating actions	responsibility for implementation
	<p>Scaling up implementation of youth clubs for girls and boys.</p> <p>This sub-component will use youth clubs and a “safe space” approach to empower adolescent girls and boys and enable them to make informed decision as they transition into adulthood by giving them relevant information and life-skills.</p> <p>These support clubs will also serve as platforms to raising adolescents GBV/SEA awareness (e.g., approaches to prevent, mitigate, and respond to GBV/SEA and linkages to a referral system for additional social services).</p>	<p>project intervention.</p> <ul style="list-style-type: none"> Support groups/clubs themselves could expose to GBV/SEA risks 	<p>group/club members semi-annually to make sure that they are not exposed to GBV/SEA but rather they are supporting each other.</p> <ul style="list-style-type: none"> Provide training for support groups/clubs on how to mitigate GBV/SEA risks and how to report if any incidents are identified. 	MoSD PFU
	<p>Subcomponent 1.3: Strengthening online training models in Mathematics and Science for junior secondary school teachers</p> <p>The project will use digital technology to provide effective teacher training in math and sciences to improve basic education service delivery and make more students interested in schooling.</p> <p>the PFU will work with various stakeholders to implement online teacher training on math and science.</p> <p>This project will focus on increasing teachers’ content knowledge and pedagogy. The pedagogical training includes how to use</p>	<ul style="list-style-type: none"> Teachers may perpetuate stereotypes and cultural norms that discourage girls’ interest in mathematics and science. Some teachers request sex from female students in return for passing grades. Potential of E-waste generation from the laptops, computers and solar panels supplied for e-learning. 	<ul style="list-style-type: none"> Integrate gender sensitive pedagogy as part of teacher training. Strengthen Teachers Code of Conduct Inform and encourage students to use project’s SEA-Grievance and Redress Mechanism (GRM) to report any misconduct. Collect and store in a lockable area, all potentially hazardous waste (end of life laptops and computer components, batteries, solar panels, etc.), for onward transportation back to supplier, recycling facility or proper disposal site. 	MoET PFU

Environmental and Social Management Framework (ESMF)

no.	project components	potential environmental, and social impacts	main mitigating actions	responsibility for implementation
	online learning materials to teach students with special needs. Each math and science teacher will be given laptops with data to access the internet to have access to the training program. The teachers will also receive face to face training in basic ICT skills. Schools without electricity will pilot utilizing various portable solar panels to test the appropriate product.			
2.0	Component 2: Piloting innovative models to explore options to strengthen ECCD service delivery. This component will pilot innovative interventions to improve access to and the quality of ECCD programs in a selected number of schools. The component will focus on the following activities: (i) piloting various construction models to improve access to reception classes in targeted primary schools; and (ii) piloting and evaluating the new ECCD curriculum in reception classes and ECCD centres.			
	Subcomponent 2.1: Piloting and evaluating the new curriculum in reception classes and ECCD centres. The Ministry has embarked upon a revision of the ECCD curriculum under the existing LBEIP project. a pilot of the new curriculum will be conducted, and the results will be evaluated to make final modifications and prepare for the scale up. The curriculum must respond to the needs of children with disabilities and facilitate inclusive pre-primary education.	<ul style="list-style-type: none"> ▪ New curriculum and teacher training may not include the information on the risk of GBV/SEA 	<ul style="list-style-type: none"> ▪ Ensure that the new curriculum and teacher training include the information and mitigation measures of GBV/SEA. ▪ Train teachers on how to address the risk of GBV/SEA to students and parents and how to report using the SEA-GRM for the project ▪ PFU to develop site-specific social checklist which will define mitigation measures in addressing social risks/impacts, with assigned responsibilities including procedures for addressing risks to SEA. ▪ Sensitization of community, students etc. about project SEA-GRM 	MoET PFU
		<ul style="list-style-type: none"> ▪ New curriculum and teacher training may not include the information on the risk of 	<ul style="list-style-type: none"> ▪ Ensure that the new curriculum and teacher training include the information and mitigation 	MoET PFU

Environmental and Social Management Framework (ESMF)

no.	project components	potential environmental, and social impacts	main mitigating actions	responsibility for implementation
		GBV/SEA	measures of GBV/SEA. <ul style="list-style-type: none"> Train teachers on how to address the risk of GBV/SEA to students and parents and how to report using the SEA-GRM for the project 	
		<ul style="list-style-type: none"> training initiatives may take up time for ECCD teachers and potentially intrude on daily routines of ECCD, Unacceptable increase in teachers' workloads, Lack of interest from the target group to participate in the project since there are no monetary or physical incentives, ECCD Trainers equipped with requisite knowledge. Improvement of facilities, water, and sanitation at ECCD centres. 	<ul style="list-style-type: none"> Explore the possibility of providing allowances to target group as incentives. Enhance capacity of teaching aides through further training and mentoring, Vulnerable children who are not attending schools should be included in the project through home visits, 	MoET PFU
	Subcomponent 2.2: Mapping of ECCD service providers and strengthening monitoring and support systems.	<ul style="list-style-type: none"> ECCD Mapping exercise may increase the risk of GBV/SEA 	<ul style="list-style-type: none"> PFU to develop site-specific ESMPs which will define mitigation measures in addressing social risks/impacts, with assigned responsibilities including procedures for addressing risks to SEA. Sensitization of community, students etc. about project SEA-GRM 	MoET PFU
3.0	Component 3: Project management, capacity building and technical assistance			

Environmental and Social Management Framework (ESMF)

no.	project components	potential environmental, and social impacts	main mitigating actions	responsibility for implementation
	<p>Project management, capacity building and technical assistance.</p> <p>The objective of this component is to strengthen key management capacities of the MoET, regional and local education offices as well as the Project Facilitation Unit (PFU), which will support the Ministry with procurement, financial management, supervision of project activities and monitoring and evaluation.</p> <p>The project will also support the provision of technical assistance to the MoET to strengthen its database on pre-schools and ECCD service providers in the country.</p>	<ul style="list-style-type: none"> Project members are not aware of GBV/SEA risks 	<ul style="list-style-type: none"> Conduct training on GBV/SEA to project staff and develop a GBV/SEA mitigation plan for the project. PFU to conduct semi-annual monitoring to check the status of GBV/SEA incidents and implementation of the GBV/SEA mitigation plan. PFU to set up a SEA-GRM. 	MoET MoSD PFU
		<ul style="list-style-type: none"> Lack of Project ownership by MoET Staff. 	<ul style="list-style-type: none"> Conduct training and awareness raising amongst MoET staff as a buy in process. Project management, capacity building and technical assistance in selected areas. 	MoET MoSD PFU

4.7 MONITORING INDICATORS

The monitoring indicators under the ESMP for assessing environmental and social management for the project, include: i) waste management; ii) compliance with legislation; iii) Environment, Social Health and Safety (ESHS) performance of the project, ESSs requirements including but not limited to, stakeholder engagement activities, adherence to COVID -19 guidelines and grievances Redress Mechanism. In addition, indicators for monitoring grievances and their resolutions will also be monitored.

Environmental and social monitoring supports cost-effective and timely assessment of the status and trends in environmental and social conditions in response to different project activities. Also, it is necessary to assess the project performance against the desired mitigation measures, and compliance with the regulations and environment and social standards in order to protect people's health and safety, and the environment health and performance. Monitoring activities should be applied to direct monitoring indicators whenever applicable to the specific impacts and/or compliance with provisions of the ESMP. The monitoring indicators are outlined in table 4-4 below.

4.8 ENVIRONMENTAL AND SOCIAL MONITORING PLAN

To keep track of the requirements, responsibilities, and costs for implementing the identified environmental and social mitigation measures, a monitoring plan has been prepared for the project. (Table 4-4). Individual sub-project can prepare site specific monitoring plans in line with the guideline in Appendix 7. The supervision of the implementation of the monitoring plan will be done using the safeguards checklist for general supervision, Appendix 4. The format of the monitoring plan includes a row for baseline information that is needed to achieve reliable and credible monitoring. The key elements of the matrix are:

- What is being monitored?
- Where is monitoring done?
- How monitoring will be carried out? /type of equipment for monitoring
- When or how frequently is monitoring necessary or most effective?
- Why is the parameter being monitored (what does it tell us about environmental impact)?

Table 4-4 Environmental and Social Management and Monitoring Plan

No.	# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility
1.0	Project Planning, Design and Installation of ICT Equipment						
1.1	Installation of ICT Equipment	Procurement of Substandard Equipment	<ul style="list-style-type: none"> ● Adherence to the project procurement procedure, ● Carry out due diligence to guarantee the credibility of manufacturers supplying the electronic devices, ● Products warranty for all Electronic Devices purchased, ● Procure all electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life, or already categorized as E-Waste, ● Faulty ICT equipment should be returned to the supplier in line with warranty period and procurement agreements ● Identify buyback options with equipment suppliers, and ● Procure electronic devices which are energy efficient, ● Adhere to the requirements of the E-waste Management Plan.) 	Available warrant of equipment	Document Review	Installation phase	Environment Expert, Procurement expert
		Localized Noise and vibration	<ul style="list-style-type: none"> ● Selecting equipment with lower sound power levels i.e., use of hand drilling machines; ● Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider used generators; ● Post safety signage including Men/Women at work; ● Provide fit to work PPEs (ear plug / ear muffs) for all workers involved in the areas with elevated noise levels; ● Coordinate with the office users / /staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site; 	Recorded cases of complaints by the staff at MoET	site Visit Document review	Installation phase	Environment Expert
		Dust Emission	<ul style="list-style-type: none"> ● Suppress dust during pneumatic drilling on the wall by water spraying where necessary, ● Practice good general housekeeping at the work site; sweep off the drilled-out materials, ● Provide fit to work PPEs for all workers involved in the renovation and installation activities in line with OHS requirements 	Recorded cases of complaints from the MoET staff	site Visit Document review, and photography	Installation phase	Environment Expert

No.	# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility
		Generation of solid waste	<ul style="list-style-type: none"> The contractor shall ensure provision of waste bin at the site to handle waste generated; Efficient use of materials to as much as possible avoid and minimize waste production; Ensure waste are recycled/reused before opting to dispose of; Adhere to the requirements of the E-waste Management Plan; Use of durable, long-lasting materials that shall not need to be replaced often; and 	# of waste Bin at the site,	Site Visit Project progress reports review	Installation phase	Environment Expert
		Occupational health and safety: slip/fall, elevated noise, dust, & electrocution	<ul style="list-style-type: none"> The contractor shall provide the workers with the required PPE and enforce on use at all times while at the work site in line with OHS requirements. The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality, Use of safety signage "MEN/WOMEN AT WORK" to warn MoETT and the contractor workers on site; Hazardous areas should be clearly marked with signs easily understood by workers, visitors and the general public, as appropriate; Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards; Electrical works should be performed by trained and qualified experts; 	Accident logs, First Aid Kits, Fire extinguishers	Site Visit Document review, and photography	Installation phase	Environment & Social Expert
		Gender-Based Violence	<p>The provision of the GBV/SEA and Child Protection Prevention and Response Action Plan shall be adhered to included but not limited to:</p> <ul style="list-style-type: none"> Monitor and report on the behaviour of project workers at all levels; Ensure the people engaged in project activities understand the GBV referral pathway; Ensure all learners and community members have access to the GRM contacts; and All workers assigned to or recruited to serve on this project shall sign the CoC (see the LMP for the project).) 	<p># of reported Cases</p> <p># of cases handled to conclusion</p> <p># Existence of GBV/SEA Plan</p>	Field Visit Document review	Quarterly	E&S Experts, Head Teachers, Social Expert
		Spread of infectious diseases-in particular COVID- 19	<ul style="list-style-type: none"> Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms; Train all workers in respiratory hygiene, cough etiquette and hand 	<p># of reported cases at site,</p> <p># availability of IPC strategies for hand</p>	Site Visit Document Review Grievance/	Installation phase	Social Expert , CPHO

No.	# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility
			hygiene; and <ul style="list-style-type: none"> • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoETT offices. • All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs; • Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including workers and visitors; • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks; • Avoid congregation of more than 15 workers at one location. • At all project sites, maintain social distancing of at least 2 meters; • Restriction of the number of people accessing the work areas; • Use alcohol-based sanitizers to fumigate the offices and work areas to be free of COVID -19 • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoET offices. 	and water hygiene, use of PPE	incident log		
	Recruitment and/or secondment of staff to the project	Labour disputes	<ul style="list-style-type: none"> • Fair terms and conditions shall be applied for workers (guided by relevant laws); • The project shall implement the Grievance Redress Mechanisms for project workers (direct workers and contracted workers) to promptly address their workplace grievances; • The project shall respect the workers' right of labour unions and freedom of association in accordance with Lesotho laws, and • Implement all the requirements of the Project LMP that has been prepared. 	# of reported cases at site,	Site Visit Document review,	Quarterly	Social Expert
2.0	Operational Phase of the Project						
	Selection of Project beneficiaries.	Discrimination and exclusion of vulnerable groups	<ul style="list-style-type: none"> • MoET shall implement a targeting program for the marginalized and most vulnerable learners especially the girls and learners with special need and teachers and remote villages, in line with GBV/SEA and Child Protection 	# Procedure of project targeting	Field Visit and Document review,	Quarterly	Social Expert,

No.	# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility
			<p>Prevention and Response Action Plan, Project Labour Management Plan, and Stakeholder Engagement Plan.</p> <ul style="list-style-type: none"> The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship in line with the project Labour Management Plan; Hold sensitization meetings on resources planning and conflict resolution mechanisms, Institutionalization of social inclusion of all categories in processes and decision making, 				
		Sexual Exploitation and Abuse (SEA)	<ul style="list-style-type: none"> Sensitization of project workers and the MoET staff and benefiting communities; Instituting Grievance redress committee to handle among others sexual abuses in line with GBV/SEA and Child Protection Prevention and Response Action Plan, Involving local authorities and police where appropriate in handling sexual abuses; and All project staff should be trained against SEA awareness programs for workers and the beneficiary community. 	# of reported cases # of cases handled to conclusion Existence of SEA Plan	Field Visit Document review	Quarterly	Social Expert
		Spread of HIV/AIDS and STIs	<ul style="list-style-type: none"> Carry out periodic HIV/AIDS awareness for workers and staff, Carry out voluntary HIV/AIDS testing for workers; and Workers should sign the CoC and abide by its provisions for HIV/AIDS awareness and prevention in line with the project Labour Management Plan. 	# HIV/ AIDS campaign done Training record available	Field Visit Document review	Quarterly	Social Expert, CBO
		Lack of or inadequate public participation and consultation	<ul style="list-style-type: none"> Use communication channels that are accessible to vulnerable and marginalized groups as well as migrants (where applicable) including use of community radios, translating information in local languages; and Identify and equip local leaders with information on the project more generally and the GRM of this ESMF for further dissemination in their communities. 	Record of Public participation, Meetings minutes, # of complains recorded	Field Visit Document review	Quarterly	Social Expert

No.	# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicator for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility
		Spread of Infectious Disease – COVID-19	<ul style="list-style-type: none"> • Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms; • Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including suppliers, workers and visitors; • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks; • Avoid concentration of more than 15 persons at one location. Where more than one person is gathered, maintain social distancing of at least 2 meters; • Use alcohol-based sanitizers to fumigate offices, work areas, store; • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoET offices /schools. 	# of reported cases at site, # availability of IPC strategies for hand and water hygiene, use of PPE	Field Visit Document review, and photography	Quarterly	Environment and Social Expert/CPHO
	Operation & Management of ICT Equipment	Generation of E-Waste with associated toxic chemicals leading to Air Pollution, pollution of ground water,	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste;</p> <ul style="list-style-type: none"> • Where available, utilize buyback options with equipment suppliers; • As much as possible, recycle all E-waste through the licensed e- waste recycling companies; • Establish an E-Waste Temporal Collection Centre at MoET; including collection bins/receptacles; • MoET shall return faulty ICT gadgets to the supplier depending on warranty period/agreement; • Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management; and • The contractor for the installation of the ICT equipment shall adhere to the provisions in the E-Waste Management Plan. 	<p>Clearly labelled E-waste bins / receptacles, Warrant for the ICT Equipment</p> <p>Temporal E-waste collecting facility at MoET, Training record for E-Waste handling,</p>	Field Visit Document review, Photography	Annually	Project Coordinator Environment expert

5. STAKEHOLDER CONSULTATION AND PUBLIC DISCLOSURE

5.1 INTRODUCTION

To ensure that potential environmental and social impacts are identified and ultimately adequately addressed, a stakeholder consultation process has been established. The current consultation process is in line with the Stakeholders Engagement Plan (SEP) that has been developed for BEST and follows the process outlined in appendix 3.

This chapter presents the public consultation plan (PCP) for the BESP. The implementing team, the PFU, under the guidance of Ministry of Education and Training (MoET) and Ministry of Social Development (MoSD) have the responsibility to continuously and effectively engage stakeholders to keep them involved with the project. The key elements of the Public Consultation Plan are:

- i. Stakeholder identification and analysis,
- ii. Information disclosure,
- iii. Stakeholder consultation,
- iv. Grievance management,
- v. Stakeholder involvement in project monitoring,
- vi. Reporting to stakeholders,
- vii. Management functions.

5.2 OBJECTIVE OF THE PUBLIC CONSULTATION PLAN

5.2.1 Objectives of The Plan

This plan provides a framework for achieving effective stakeholder involvement and promoting greater awareness and understanding of issues so that the project is carried out effectively within budget and on-time. The goals of the public consultations are to provide the BESP with

- Status of implementation of the identified measures,
- A sense of the concerns, priorities, and aspirations of the MoET/MoSD staff as they implement the measures,
- Information to shape the programs of the project as it progresses,
- Whenever possible, specific recommendations and proposals.

And provide the rest of the stakeholders with:

- A forum to interact constructively and make progress towards solutions and actions,
- Feedback from BESP on information received and steps to follow.

5.2.2 Principles

To ensure effective implementation of this plan, the PFU shall be committed to the following principles:

- promoting openness and communication.
- ensuring effective stakeholder involvement.
- evaluating the effectiveness of the engagement plan in accordance with the expected outcomes.

5.3 IDENTIFYING TARGET GROUPS

Stakeholders for the purpose of this programme shall be defined as all those people and institutions that have an interest in the successful planning and execution of the activities. This includes those likely to be positively and negatively affected by the programme. Table 5-1 is a matrix that will be used to identify the key stakeholders for each sub-project:

Table 5-1 Stakeholder Identification Matrix

AFFECTED PARTIES	HOW TO IDENTIFY THEM
People living in the vicinity of the proposed works. (students, teachers, parents etc.)	<ul style="list-style-type: none"> Identify the local government area(s) that falls within 500m radius of the proposed infrastructure. Review available data to determine the profile of the whole stakeholder or relevant group. Use identified groups and individuals to tap into stakeholder networks to identify others.
Special interest groups	<ul style="list-style-type: none"> Identify key individuals or groups through organized groups, local clubs, community halls and religious places. Be aware of similar local groups or individuals.
Special interest groups	<ul style="list-style-type: none"> Identify key individuals or groups through organized groups, local clubs, community halls and religious places. Be aware of similar local groups or individuals.

The consultation process shall ensure that all those identified as stakeholders are conferred with. Subject to PFU approval, the Environmental/Social consultant will share information about the sub-project with the public to enable meaningful contributions and thus enhance the success of the programme.

5.4 KEY STAKEHOLDERS

The key stakeholders to be continuously engaged includes all those listed in Table 5-2 below. The list in table 5-2 is not exhaustive. As the Programme gets underway, the PFU will develop a detailed PCP identifying all possible stakeholders, their specific information needs, and the appropriate modes of consultation as well as feedback mechanisms.

Table 5-2 Potential Stakeholders for BEST

	Institution	Stakeholder
1.0	Stakeholder Communities	A provisional list of affected communities (villages) will be compiled based on the selected schools and area of impact
2.0	Government Ministries and Offices	<ul style="list-style-type: none"> Ministry of Education and Training Ministry of Social Development Ministry of Local Government and Chieftainship <ul style="list-style-type: none"> District Administrators District Community Secretaries Community Council Secretaries Principal Chiefs Area Chiefs Local Chiefs Ministry of Tourism Environment and Culture <ul style="list-style-type: none"> Department of Environment Ministry of Finance Ministry of Planning and Development
3.0	Non-Governmental Organisations (NGOs)	<ul style="list-style-type: none"> ???

4.0	Schools	<ul style="list-style-type: none"> • Schools
5.0	Early Childhood Care and Development (ECCD) Schools	
6.0	Vulnerable/Disadvantaged Groups Stakeholders	<ul style="list-style-type: none"> • Physically disabled • Orphans • Children from households below poverty line

Information elicited from them: The type of information to be disclosed to the various stakeholders depends on their interests and how they will be affected by the Programme – or how BESP activities may be affected by them. Thereafter various communication tools can be utilized for the engagement process, such as:

- Programme notices published in local newspapers.
- Radio advertisements.
- Direct mailings to communities.
- Presentations with or without focus group sessions);
- Targeted e-mails.
- One-on-one meetings, presentations, seminars, workshops, e-mails, and phone conversations with stakeholders.
- Site tours; and
- The use of social media.

Table 5-3 below gives a general overview of the types of information needs for various stakeholder groups.

Table 5-3 Summary Overview of a Public Consultation Plan (PCP) for BESP

Stakeholders	Information to be disclosed	Consultation means
BESP sub-projects, neighbouring communities, general public	Current and new activities and how these relate to them in terms of opportunities and threats	Local leaders i.e., Chief's or district offices, Churches, national media, social media, WB/MoET/BESP website etc.
	Forum to express community education concerns and get feedback	Public consultations, focal group discussions, social media Training specific members of the communities, awareness, education
Staff / workers at existing education facilities	How ICT and installed Solar Panels will affect their work environments including Occupational Health & Safety rules	Staff newsletters, bulletin boards, signs in labs; email, website, meetings with management, staff sensitization & training program in lab safety
Intergovernmental Institutions, Other NGOs	Sharing Implementation findings and experience.	Intergovernmental meetings and consultations
		Build partnerships through meetings, seminars, workshops
University Graduates	Internship opportunities	Website, public media, bulletin boards
Youths	Opportunities for remaining in school under difficult conditions.	Website, public media, bulletin boards, public consultations

5.5 STAKEHOLDER CONSULTATION

A variety of consultation techniques will be used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders. This consultation process will provide a framework for achieving effective stakeholder involvement and promoting greater awareness and

understanding of issues so that the project is carried out effectively, within budget and on-time.

The guidelines for public consultation include, among others, a requirement that major elements of the consultation program should be timed to coincide with significant planning and decision-making activities in the project cycle. Ideally, public consultations should be undertaken during (i) the preparation of the EA terms of reference; (ii) the carrying out of an EA; and (iii) government review of an EA report.

BESP has the responsibility to effectively engage stakeholders in achieving the project objectives.

The first step will be to hold public consultations with the local communities, MoET staff and all other interested/affected parties during project inception. These consultations will be aimed at briefing the communities/staff about the project activities, how the activities will be carried out and what sectors of the environment are likely to be impacted.

The stakeholder consultation process for the preparation of this ESMF was complicated by the ravaging COVID-19 pandemic which limited the study team's movements and consultations; thus, full scale site visits could not be conducted. For this reason, two approaches will be presented, one to be used under normal circumstances and the other under emergency situations. This is to allow the engagement processes to be conducted under all situations.

5.5.1 Stakeholder Consultation Under normal conditions

All things being equal the techniques that will be used for the continuous consultation process for this project include the i) potential project site visits, ii) One on one meetings with key stakeholders, iii) Focus group meetings with stakeholders and MoET staff, and iv) Administration of Questionnaires to all key stakeholders. The appropriate application of these techniques is further expounded in Table 5-4 below:

Table 5-4 Stakeholder engagement techniques

No.	CONSULTATION TECHNIQUE	APPROPRIATE APPLICATION OF THE TECHNIQUE
1.	Correspondence (Phone, Emails)	<ul style="list-style-type: none"> Distribute information to Government officials, NGOs, Local Government, and organisations/agencies. Invite stakeholders to meetings and follow-up
2.	One-on-one meetings	<ul style="list-style-type: none"> Seeking views and opinions Enable stakeholder to speak freely about sensitive issues. Build personal relationships. Record meetings
3.	Formal meetings	<ul style="list-style-type: none"> Present the Project information to a group of stakeholders. Allow group to comment – opinions and views. Build impersonal relation with high level stakeholders. Disseminate technical information. Record discussions
4.	Public meetings	<ul style="list-style-type: none"> Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions.

		<ul style="list-style-type: none"> • Build relationship with the communities, especially those impacted. • Distribute non-technical information. • Facilitate meetings with presentations, PowerPoint, posters etc. • Record discussions, comments, questions.
5.	Focus group meetings	<ul style="list-style-type: none"> • Present Project information to a group of stakeholders (8-15 people groups) • Allow stakeholders to provide their views on targeted baseline information. • Build relationships with communities. • Record responses
6.	Project website	<ul style="list-style-type: none"> • Present project information and progress updates • Disclose GRM and other relevant project documentation
7.	Project leaflet	<ul style="list-style-type: none"> • Brief project information to provide regular update. • Site specific project information.
8.	Surveys	<ul style="list-style-type: none"> • Gathering opinions and views from individual stakeholders • Gather baseline data. • Record data • Develop a baseline database for monitoring impacts
9.	Workshops	<ul style="list-style-type: none"> • Present project information to a group of stakeholders • Allow a group of stakeholders to provide their views and opinions. • Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies. • Record responses.

5.5.2 Stakeholder Consultation Under Pandemic Conditions

Under pandemic conditions the techniques that will be employed for the continuous consultation process for this project will be the same as under normal situation only that face-to-face engagements will be limited; site visits will also be limited and more electronic communication will be used. The strategy will include the following:

- limited site visits.
- limited face to face interviews.
- Selecting Key stakeholders and using them as the representative sample.
- limited physical completion of Questionnaires.
- limited focus group meetings.
- more of Virtual Meetings (Zoom, Microsoft Teams, Skype, etc.).
- more of electronic administration of Questionnaires.

The consultation process will be continuous throughout the life of the project and will be used as a means of checks and balances for the proper implementation of the project. Thus, the process will employ a technically and culturally appropriate approach which involves identifying the concerned/affected stakeholders, soliciting their views, and continuously checking if their views are being taken care of as the project implementation progresses.

5.6 GRIEVANCE REDRESS MECHANISM

Implementation of sub-projects activities under BESP will take place in various locations of the country. The implementation may generate several challenges and complaints especially to those which relate to infringement of rights of sections of the society. As part of addressing such complaints and in the spirit of the continuous consultation process, a

grievance redress mechanism has been developed for BESP. The grievance redress mechanism (GRM) has been presented as part of a separate Stakeholder Engagement Plan (SEP).

The GRM will be a system by which queries or clarifications about the programme will be responded to, problems with implementation will be resolved, and complaints and grievances will be addressed efficiently and effectively. The purpose of the grievance redress mechanism is:

- To be responsive to the needs of beneficiaries and to address and resolve their grievances.
- To serve as a conduit for soliciting inquiries, inviting suggestions, and increasing community participation.
- To collect information that can be used to improve operational performance.
- To enhance the programme's legitimacy among stakeholders.
- To promote transparency and accountability.
- To deter fraud and corruption and mitigate programme risks.

6. TRAINING AND CAPACITY BUILDING

6.1 NEED FOR TRAINING AND CAPACITY BUILDING.

In order to assure the successful implementation and monitoring of the environmental and social management framework (ESMF), the target groups and stakeholders who will play a role in the implementation of the ESMF must be provided with appropriate training and awareness. This is because the implementation of the activities will require inputs, expertise and resources which will be adequately taken care of if the concerned parties are well trained. These groups include the following:

(a) Community and District (Local) level

The BESP-PFU together with the District representatives of participating Ministries (MoET, MoSD, Ministry of Communication, Science and Technology (MCST), etc.) will be responsible for completing the environmental and social checklist (Appendix 1)⁸ to be able to identify and mitigate the potential environmental and social impacts of implementing the BESP. At local level, the groups that will receive environmental and social training to be able to carry out their task include the following:

- District environmental officers
- District education officers
- School Heads
- Teachers

(b) National level

For the smooth implementation of the Lesotho BESP ESMF, staff at national level must understand all the environmental and social issues too. The groups that will need training at national level will include:

- Environmental Officers
- PFU staff
- MoET staff
- MoSD staff
- Other collaborating institutions.

6.2 ENVIRONMENTAL AND SOCIAL TRAINING OF STAKEHOLDERS.

The proposed Lesotho BESP activities will be numerous and challenging. Successful implementation of the project activities will require dynamic and multi-disciplinary professionals. Therefore, regular short and tailor-made training courses and seminars will be required to reinforce the capacity and skills of the stakeholders and beneficiaries during the entire project period.

⁸ The environmental and social checklist (Appendix 1) will be used as the site specific ESMP for these small sub-projects at each school. Instead of developing a fully-fledged site specific ESMP, sub-projects will be required just to use appendix 1 and develop site specific Checklist – ESMPs.

The stakeholders have different training needs ranging from awareness, sensitization, and comprehensive training,

- Awareness raising will cause the participants to acknowledge the significance or relevance of the issues, but without in-depth knowledge of the issues.
- Sensitization will cause the participants to be familiar with the issues to the extent of demanding precise requirements for further technical assistance.
- Comprehensive training will raise the participants to a level of being able to train others and to competently act on environmental and social issues in their areas.

Training and seminars will be undertaken and table 6-1 below provides costs estimates for the identified capacity building activities. The basis of the estimates is on some of the following:

- Prevailing costs of goods and services offered in typical urban or rural areas.
- An average number of 30 people for District teams
- An average number of 30 people for a local level team.
- The length of training sessions will depend on the course and will vary from 3 days to about 2 weeks.
- The estimated costs include training costs/fees, hire of rooms, food for participants, per diems, and transport costs. Training subsistence allowances have been estimated at R 150.00 per participant per day while a lump sum of R 30 000.00 has been included for each training session to cover the costs of the trainer.

Table 6-1 Summary of Capacity Building Requirements and Cost Estimates

No.	TRAINING ACTIVITY	TARGET GROUP / TRAINER	MEANS OF VERIFICATION	COST ESTIMATES
1.	<ul style="list-style-type: none"> Environmental Social Management Framework (ESMF) Environmental and Social Assessment – ESMPs of the sub-projects: <ul style="list-style-type: none"> - Screening process. - Use of checklists - Preparation of terms of reference. - Identification of Impacts - Strategic action planning for Environmental Management - Policies and laws in Lesotho - World Bank Environmental and Social Standards (ESSs) 	<ul style="list-style-type: none"> All Education workers All workers involved in the Implementation of this project. District Environment Units Extension workers in project impact areas. Relevant Line Ministries Community Members <p>TRAINER: Dept of Environment OR PRIVATE CONSULTANT</p>	<p>Annually, job orientation and on spot</p> <p>In each District:</p> <ul style="list-style-type: none"> 10 members of District Education Office Team are trained. 5 members of each relevant line ministry trained. 10 Community members level 	<p>@ \$2 000.00 per District for two session each, during the entire project period)</p> <p>Venue :</p> <p>Length : 5 days</p> <p>Cost : \$ 40,000.00</p>
2.	<ul style="list-style-type: none"> Gender, GBV and SEA Issues <ul style="list-style-type: none"> - Awareness - Counselling - Equal opportunities 	<ul style="list-style-type: none"> Extension workers in project impact areas Community members District Education Office Teams <p>TRAINER: PRIVATE CONSULTANT OR MAFS</p>	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of District Education Office Team are trained. 30 Community members level 	<p>@ \$ 1 000.00 per District for one session each, during the entire project period)</p> <p>Venue: The Homesteads/farms</p> <p>Length: 5days</p> <p>Cost : \$20,000.00</p>
3.	<ul style="list-style-type: none"> Waste Management <ul style="list-style-type: none"> - Handling of e-waste - Proper waste disposal 	<ul style="list-style-type: none"> Extension workers/teachers? in project impact areas Community members District Health Office Teams 	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of District Education Office Team are trained. School heads ?? 	<p>@ \$ 1 500.00 per District for two session each, during the entire project period</p> <p>Venue: The Homesteads/Farms</p> <p>Length: 5 days</p> <p>Cost : \$30 000.00</p>
	TOTAL BUDGET			\$90,000.00

6.3 PROPOSED APPROACH IN EXECUTING THE TRAINING ACTIVITIES

The BESP will adopt a strategy of running workshops and refresher courses to disseminate the safeguards instruments. It will also use the training of trainers and community exchange visits approach.

The training activities in Environmental and Social Impact Assessment can be conducted by the Department of Environment or private consultants under the supervision of the Department of Environment. This will have to be done at the beginning of the project, before the project activities start, so that the participants are ready in time to apply the knowledge during implementation of the project activities. Skills in the screening process will be especially useful for assessing the environmental and social implications of the project activities before they start.

7. FUNDING ARRANGEMENTS

7.1 FUNDING FOR THE ENVIRONMENTAL MANAGEMENT ACTIVITIES

The following are the budget estimates for the activities in the ESMF. The budget is meant for implementing and monitoring the recommended mitigation measures throughout the project life. **The budget must be integrated into the overall programme costs to ensure that the proposed mitigation measures are implemented.**

The proposed environmental activities for the programme will be funded directly by the programme resources in accordance with the proposed plan laid out below.

7.2 MITIGATION MEASURES

This component is for implementing mitigation measures in each district, which include: (i) Prevention of GBV, (ii) prevention of HIV/AIDS, (iii) prevention of e-waste pollution and (iv) Gender mainstreaming.

Mitigation and enhancement measures were discussed in detail in tables 4-1 and the following is a summary of some of the measures with cost implications.

Table 7-1 Mitigation and enhancement measures Budget

No.	MITIGATION/ENHANCEMENT	COST ESTIMATION	ESTIMATED COST (US \$)
1.0	Stakeholder Participation <ul style="list-style-type: none">Conduct a comprehensive participatory stakeholder mapping exercise including roles and responsibilities at national, provincial, district and local area level.Conduct adequate situational assessment to determine different vulnerability dimensions.	Stakeholder Participation/consultation exercises including field visits to participating schools. Lump Sum for all District for over the entire project period to cover travel costs, allowances, w/shops, etc Venue: all districts Length: continuous Total Cost: \$ 20,000.00	20,000.00
	Sub-total		20,000.00

7.3 MONITORING, EVALUATION AND REVIEWS

This component covers monitoring, evaluation and reviews. It provides for training both the BESP staff and the beneficiaries in participatory environmental monitoring. This entails monitoring the implementation of mitigation measures at the sub-project level. The component will comprise:

- the monitoring and evaluation issues of the whole programme
- Monitoring and Evaluation of the progress of the implementation of the ESMF. Assessing whether it is being effective or not.

The project will also carry out reviews and bi-annual audits and an end of project audit. Audits will be done bi-annually whilst reviews will be done annually after every annual report is produced.

An audit is different from a review. In a review, the auditor conducts analytical procedures and makes inquiries to ascertain whether the information contained within the annual report is correct. The result is a limited level of assurance that the annual report being presented does not require any material modifications. In an audit, the auditor must corroborate the information in the annual report. This calls for a thorough examination of all the documentation leading to the annual report, Confirmations from beneficiaries, physical inspections of sub-projects and other procedures as needed.

Thus, the audit gives a higher level of assurance that the annual report is fairly presented. An audit also requires a significant amount of time and effort to complete and thus audits are much more expensive than reviews. The following is the cost estimate for the Audits.

Table 7-2 Monitoring, Evaluation, Annual Reviews and audits

No.	ACTIVITY	COST ESTIMATION	Estimated Cost (US \$)
1.0	Monitoring and evaluation exercises	Continuous monitoring and evaluation exercises including field visits to participating schools. Lump Sum for all District for over the entire project period Venue: all districts Length: continuous Total Cost: \$ 50,000.00	50,000.00
2.0	Bi- Annual Audit	Bi- Annual Audit exercises including field visits to participating schools. Lump Sum figure for the audit fees. Venue: all districts Length: Bi- Annually Total Cost: \$ 20,000.00	20,000.00
3.0	Annual Reviews	Annual Reviews exercises including field visits to participating schools. Lump Sum figure for the review fees for the consultants. Venue: all districts Length: once every year. Total Cost: \$ 10,000.00	10,000.00
4.0	End of Project Audit	End of Project Audit exercises including field visits to participating schools. Lump Sum figure for the audit fees. Venue: all districts Length: End of Project. Total Cost: \$ 15,000.00	15,000.00
	Sub-Total		95,000.00

7.4 ENVIRONMENTAL AND SOCIAL TRAINING

Environmental and Social Training were discussed in detail in table 6-2 and the following is a summary of the budgetary requirements for the proposed training activities.

Table 7-3 Environmental and Social Training Budget

No.	TRAINING ACTIVITIES	COST ESTIMATION	BUDGET (Rands)
1.0	<ul style="list-style-type: none"> Capacity Assessment needs to be conducted before commencing implementation, Environmental Social Management Framework (ESMF) Environmental and Social Assessment – ESMPs of the sub-projects: <ul style="list-style-type: none"> High level training in Environmental and Social Risks of BESP Training in Environmental and Social Impact Assessment Sensitization on environmental and social management framework 	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of District Education Office Team are trained. 5 members of each relevant line ministry trained. 10 Community members level. <p>@ \$2 000.00 per District for two session each, during the entire project period)</p> <p>Venue: Length: 5 days Total Cost: \$ 20,000.00</p>	20,000.00
3.0	<ul style="list-style-type: none"> Gender, GBV and SEA Issues <ul style="list-style-type: none"> Awareness Counselling Equal opportunities 	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of District Education Office Team are trained. 30 Community members level <p>@ \$ 1 000.00 per District for one session each, during the entire project period)</p> <p>Venue: The Homesteads/farms Length: 5days Cost : \$15,000.00</p>	15,000.00
4.0	<ul style="list-style-type: none"> Waste Management <ul style="list-style-type: none"> Handling of e-waste Proper waste disposal Sensitization of all schools to: <ul style="list-style-type: none"> store E-waste properly before disposal. Handle the solid waste properly. 	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of District Education Office Team are trained. All participating School heads <p>@ \$ 1 000.00 per District for two session each, during the entire project period</p> <p>Venue: The Homesteads/Farms Length: 5 days Cost : \$15 000.00</p>	15 000.00
TOTAL			\$ 50,000.00

7.8 ESMF IMPLEMENTATION BUDGET SUMMARY

The following is the ESMF Implementation budget summary taking into consideration all the issues covered in sections 7.1 to 7.3:

Table 7-4 Estimated Budget for ESMF Implementation (US\$)

No.	YEAR	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	TOTAL
	ACTIVITY						
1	Mitigation Measures	40,000.00	30,000.00	20,000.00	15,000.00	5,000.00	20,000.00
2	Monitoring and evaluation purposes (R&D, M&E, Field Visits)	40,000.00	20,000.00	15,000.00	10,000.00	5,000.00	95,000.00
3	Environmental and Social Training	40,000.00	20,000.00	15,000.00	10,000.00	5,000.00	50,000.00
	Sub - Total						165,000.00
	10% Contingency						16,500.00
	Grand Total						181,500.00

Notes:

- Specific and clearly identified budget line for environmental and social issues should be included in the tender documents.
- 10% of contract value should be kept until the Environment Officer/EAD confirms that all the environmental and social mitigation measures are appropriately implemented, and the Environmental Affairs Department has approved.
- ESIA's and ESMPs will be prepared for all sub-projects which have potential significant negative impacts, and these provide cost estimates for the implementation of specific mitigation and management measures for those sub-projects.

8. CONCLUSIONS AND RECOMMENDATIONS

The proposed BESP has potential to significantly improve the education system of Lesotho. BESP is posed to achieve the intended coverage of children from the poorest households to improve their educational outcomes and improve on the targeting to achieve better impact of the bursary. The project will also be better linked to health and education outcomes to result in benefit levels which can generate impacts on poverty reduction and human capital outcomes.

The BESP project is expected to have more positive than negative environmental and social impacts. The envisaged environmental and social impacts include generation of E-waste and solid waste, stakeholder engagement issues, and possible GBV/SEA issues. These envisaged environmental and social impacts will generally be localized, minimal, short term and can be mitigated. However, this will entail incorporating all the requisite mitigation measures and adhering to the requirements of the current ESMF. **The Final benefits of this programme to the nation will, by far outweigh potential negative effects.**

It is therefore recommended that:

- Any resultant increase in E-Waste must be handled properly, safely storing it and disposing the waste appropriately.
- Stakeholder organizations such as Community Councils, Department of Environmental Affairs, NGOs, and other interested parties are consulted and kept informed of the implementation progress so that they can play their part.
- Any sub-project that falls within the parameters of the Exclusion List, will not be considered for funding under BESP.
- The recommended mitigation measures should be implemented to reduce any significant environmental and social impacts.

The ESMP presented in the study (Section 4.7) will be used to mitigate the impacts during and after the implementation of the BESP. The Final benefits of this project to the nation will, by far outweigh any potential negative effects. Further, the project will overall not have any significant environmental and social impacts if the recommended mitigation measures are carried out.

9. BIBLIOGRAPHY

Government of Lesotho (1998). National Environmental Policy, 1998, Ministry of Tourism, Environment and culture, Department of Environment, Maseru, Lesotho.

Government of Lesotho (2002), Constitution of Lesotho, Maseru, Lesotho

Government of Lesotho (2003), National Gender and Development Policy of Lesotho of 2003, Ministry of Gender, youth, and sports. Maseru, Lesotho.

Government of Lesotho (2008a), Environment Act No 15 of 2001, Maseru, Lesotho

Government of Lesotho (2008b). The Hazardous and Non-Hazardous Waste Management Act, 2008, Ministry of Health, Maseru, Lesotho.

Government of Lesotho (2008c), Water Act No. 15 of 2008, Ministry of Water, Maseru, Lesotho

Government of Lesotho (2010). Education Act 2010, Ministry of Education and training, Maseru, Lesotho.

Government of Lesotho (2010). Ministry of Tourism, Environment and culture, Department of Environment, Guidelines for environmental impact assessment.

Government of Lesotho (2008). The Hazardous and Non-Hazardous Waste Management Act, 2008

Government of Lesotho (2012). The Public Health Order No. 12 of 1970, Ministry of Health, Maseru, Lesotho.

Government of Lesotho, (2013); National Strategic Plan for Integrated Early Childhood Care and Development 2013/2014 – 2017/2018 Maseru, Lesotho, 2013.

IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>.

WB, 2019.

10. APPENDICES

APPENDIX 1 ENVIRONMENTAL AND SOCIAL CHECKLIST



THE KINGDOM OF LESOTHO

ENVIRONMENTAL AND SOCIAL CHECKLIST

FOR SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS OF THE BESP

Name of Sub-project Representative:

Sub-project Name:

Sub-project Address:

.....

Name of Extension Team Representative.....

Address:

.

.....

		Appraisal		Significance			Potential Mitigation Measures
		Yes	No	Low	medium	high	
1.0	Environmental and Social Checklist						
	Will the project generate the following negative impacts						
1.1	Loss of trees/vegetation						
1.2	Soil erosion/siltation in the area						
1.3	Pollution to land- e.g., E-waste generation.						
1.4	Dust emissions						
1.5	Solid and liquid wastes e.g., open obsolete solar panels.						
1.6	Spread of HIV/Aids and other STI						

1.7	Spread of COVID – 19.						
1.8	Rubble/heaps of excavated soils						
1.9	Generation of E- waste and Contamination from e- waste handling						
1.10	Spread of water borne diseases e.g., Malaria						
1.11	Health hazards to education workers and communities						
2.0	Social Checklist						
	Will the project generate the following negative social and economic impacts?						
2.1	Loss of assets and economic goods						
2.2	Cause or promote Gender Based Violence.						
2.3	Cause or promote Sexual Exploitation and Abuse						
2.4	Cause or promote Loss of privileges or discrimination against women and youths.						
2.5	Conflicts over use of project benefits and communal facilities.						

Consultation (comments from beneficiaries)

Endorsement by Environmental District Officer	Endorsement by School Head
Name.....	Name:.....
Signature:.....Date.....	Signature:..... Date:.....

APPENDIX 2 WORLD BANK ENVIRONMENTAL AND SOCIAL FRAMEWORK (ESF)

The Environmental and Social Framework (ESF) applies to all new Bank investment projects commencing after the effective date of the ESF. It is made up of the World Bank's vision for sustainable development, the World Bank's Environmental and Social Policy for Investment Project Financing, and ten Environmental and Social Standards (ESS). These set out the mandatory requirements for the World Bank, in relation to the projects it supports through Investment Project Financing (IPF), and for Borrowers.

APX 5.1 VISION FOR SUSTAINABLE DEVELOPMENT

The World Bank Group Strategy¹ sets out the corporate goals of ending extreme poverty and promoting shared prosperity in all its partner countries. Securing the long-term future of the planet, its people, and its resources, ensuring social inclusion, and limiting the economic burdens on future generations will underpin these efforts. The two goals emphasize the importance of economic growth, inclusion, and sustainability— including strong concerns for equity.

At the project level, these global aspirations translate into enhancing development opportunities for all, particularly the poor and vulnerable, and promoting the sustainable management of natural and living resources. Therefore, within the parameters of a project, the Bank seeks to:

- Avoid or mitigate adverse impacts to people and the environment,
- Conserve or rehabilitate biodiversity and natural habitats, and promote the efficient and equitable use of natural resources and ecosystem services,
- Promote worker and community health and safety,
- Ensure that there is no prejudice or discrimination toward project-affected individuals or communities and give particular consideration to Indigenous Peoples, minority groups, and those disadvantaged or vulnerable, especially where adverse impacts may arise, or development benefits are to be shared,
- Address project-level impacts on climate change and consider the impacts of climate change on the selection, siting, planning, design, and implementation and decommissioning of projects, and
- Maximize stakeholder engagement through enhanced consultation, participation, and accountability.

APX 5.2 ENVIRONMENTAL AND SOCIAL POLICY

This is the World Bank's Environmental and social policy for investment project financing. It sets out the mandatory requirements of the Bank in relation to the projects it supports through Investment Project Financing.

The Bank is committed to supporting Borrowers in the development and implementation of projects that are environmentally and socially sustainable, and to enhancing the capacity of Borrowers' environmental and social frameworks to assess and manage the environmental and social risks and impacts⁶ of projects. To this end, the Bank has defined specific Environmental and Social Standards (ESSs), which are designed to avoid, minimize, reduce, or mitigate the adverse environmental and social risks and impacts of projects. The Bank will

assist Borrowers in their application of the ESSs to projects supported through Investment Project Financing in accordance with this Environmental and Social Policy for Investment Project Financing (Policy).

To carry out this Policy, the Bank will:

- a. Undertake its own due diligence of proposed projects, proportionate to the nature and potential significance of the environmental and social risks and impacts related to the project,
- b. As and where required, support the Borrower to carry out early and continuing engagement and meaningful consultation with stakeholders, in particular affected communities, and in providing project-based grievance mechanisms,
- c. Assist the Borrower in identifying appropriate methods and tools to assess and manage the potential environmental and social risks and impacts of the project,
- d. Agree with the Borrower on the conditions under which the Bank is prepared to provide support to a project, as set out in the Environmental and Social Commitment Plan (ESCP), and
- e. Monitor the environmental and social performance of a project in accordance with the ESCP and the ESSs.

APX 5.3 ENVIRONMENTAL AND SOCIAL STANDARDS (ESS)

Projects supported by the Bank through Investment Project Financing are required to meet the following Environmental and Social Standards:

- Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts,
- Environmental and Social Standard 2: Labour and Working Conditions,
- Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management,
- Environmental and Social Standard 4: Community Health and Safety,
- Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement,
- Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources,
- Environmental and Social Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities,
- Environmental and Social Standard 8: Cultural Heritage,
- Environmental and Social Standard 9: Financial Intermediaries, and
- Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure.

The Environmental and Social Standards are designed to help Borrowers to manage the risks and impacts of a project, and improve their environmental and social performance, through a risk and outcomes-based approach. The following is a summary of the ten ESSs:

ESS1:- Assessment and Management of Environmental and Social Risks and Impacts_sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through IPF, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

ESS2:- Labour and Working Conditions_recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

ESS3:- Resource Efficiency and Pollution Prevention and Management_recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle.

ESS4:- Community Health and Safety_addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

ESS5:- Land Acquisition, Restrictions on Land Use and Involuntary Resettlement involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

ESS6:- Biodiversity Conservation and Sustainable Management of Living Natural Resources_recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development and it recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. ESS6 also addresses sustainable management of primary production and harvesting of living natural resources and recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project.

ESS7:- Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS7 is also meant to avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.

ESS8:- Cultural Heritage_recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

ESS9:- Financial Intermediaries_(FIs) recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on several considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

ESS10:- Stakeholder Engagement and Information Disclosure_recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

APPENDIX 3 STAKEHOLDER ENGAGEMENT PROCESS

This appendix contains the details of the field consultations that were conducted for the development of the ESMF.

APP 3.1 Minutes of BESP Stakeholder's engagement Meeting: 5th March 2021

The following is an outline of the Public Consultation meeting that was held on the 5th of March 2021.

i) In Attendance:

Table APP 4.1 List of Consulted Stakeholders.

No.	MEETING DATE	NAME	ORGANIZATION	DESIGNATION	Contact No. & Email Address
2.1.1	05/03/21	Maema Ramaema	MoET	Monitoring and Evaluation Specialist. MoET PFU	
2.1.2	05/03/21	Lineo Mokitimi	MoET	Director Planning MoET.	
2.1.3	05/03/21	Mabakubung Bertha Seutloali	MoET	CEO Secondary Education	
2.1.4	05/03/21	Letsatsi Ntsibulane	MoET	Teachers' Association	
2.1.5	05/03/21	Mots' eoa Tshabalala	UNICEF	Director - UNICEF	
2.1.6	05/03/21	Shoeshoe Mofokeng	NECDOL	Director - NECDOL	

ii) Chronology of events

1. Introductions
2. Introduction to BESP, Rationale and background to the project and its Components
3. Overview of the ESMF and its implications on the project
4. Review and summary discussions of the issues to consider and social and environmental needs and the shared tool.
5. Way forward

iii) Details of Issues discussed per Agenda Item

1. Introductions

The Participants introduced themselves and the attendance list outlines participants who participated in the meeting.

2. Introduction to BESP, Rationale and background to the project and its Components.

A summary presentation of the BESP was made based on information in the BESP Appraisal document. The key issues highlighted in this presentation included amongst others: The rationale of the project development was informed by this except from the BESP PAD.

a) *Background and Summary of Project Structure and Strategy*

Presentation: The World Bank has been providing support to improve access to education through large school construction programs, that have mostly been successful particularly at the primary education level. More recent projects focused on improving student retention and quality of maths and science education, including the ongoing projects of the GPE financed LBEIP and World Bank financed LEQEP. While there have been challenges in the implementation of these projects, there are also notable successes. To improve student retention, these two projects have made inroads in engaging parents, communities and school leaders to address the issue through the establishment of over 400 functioning school-based management committees (SBMC) in schools serving the poorest communities in Lesotho. These SBMCs, which have been trained under the project, have analyzed- at a school level- the reasons why students drop out of primary and junior secondary schools and what can be done to keep them in school. In most instances, as confirmed in household surveys, the high direct and indirect costs of schooling, and pregnancy for girls, are the main reasons behind students dropping out. While the school grants provided under the two ongoing projects have improved learning environments in schools, the intervention has been insufficient to improve student retention, and there is need complement this with demand-side interventions, i.e. Supporting families to send children to school. Other successes under existing projects include the Progressive Mathematics Initiative- Progressive Science Initiative (PSI-PMI) model, which has a strong online teacher training component has been successfully piloted and promising results have been documented. Moreover, the revision of the ECCD curriculum is moving forward under LBEIP with support from multiple partners including UNICEF and the Lego Foundation.

Building on ongoing initiatives in the education and social protection, the proposed grant seeks to improve student retention and the quality of education in targeted regions of Lesotho by: (i) supporting adolescents to stay in school by improving the targeting and impact of the OVC-B and the CGP cash transfers, (ii) supporting adolescents through peer support and mentorship groups by expanding existing youth club initiatives, and (iii) scaling up the Mathematics and Science online training for junior secondary teachers to improve their content knowledge and pedagogical instruction in these subjects. The project will also support the MoET to build a system to monitor ECCD service provision in Lesotho, provide support to roll out the new ECCD curriculum and develop costed expansion strategy for the sector.

Feedback: The collective demonstrated that they understood and appreciated the focus of the project and its strategy and emphasized that the proposed activities seemed rather important but shared concern that the project seems to lack focus particularly with the size of the resources envelope. It was advised that it will be helpful and wise to look into the project and its alignment with the 2016-2026 ESSP (Education Sector Strategic plan). It was however noted that the proposed activities are all important for the improvement of the education sector in Lesotho.

b) *Overview of the ESMF and its implications on the project*

Presentation:

The collective was made aware that as part of project preparation requirements, it is critical to ensure a detailed Environmental and Social impacts mitigation strategy which is informed by a number of key documents not particularly for documentation purposes. The documentation merely presents evidence of consideration and preparedness of implementing partners. The eventuality of social and environmental externalities for development interventions is second nature and therefore is advisable to have a preparedness system of forecasting what negative impacts might accrue from the implementation of the project and how best they can be mitigated against. The collective was briefed on the World Bank Environment and Social Management Framework by presenting an outline of the Environment and Social Standards and how a consideration of these should be made during development of any new project.

The presentation transitioned into a presentation of the proposed tool which participants had already received through e-mail by the time of the meeting. The key focus was on the following Issues:

1.0 IMPLEMENTATION/OPERATION PHASE

As the project is being implemented it will generate various social and environmental impacts. In your view, what Environmental, and Social impacts do you foresee during this implementation stage of the project?

1.1 Environmental Issues: *(e.g., Pollution due to solid waste, hazardous waste and end of life E-waste from the provided computers, laptops, solar panels and battery packs.)*

Feedback: Based on the overview of the project The issue that was foreseen to be a likely cause of some level of environmental impact was the potential disposal of laptops and solar panels to be used under the project. There was contention however that in Lesotho because of the rarity of hardware, these components are so valuable that laptops usually have secondary use beyond the primary expected lifespan and that in many instances these end up getting fixed as opposed to being disposed of. The use of a laptop in a country such as Lesotho tends to really be long. It was suggested that the offset of the effects of this may be very long term.

1.2 Social Issues: *(e.g., Increased incidence of social conflicts, promotion of GBV/SEA incidences, special considerations for disadvantaged, poor communities.)*

Feedback: It was postulated that the social issues from the perspectives are very limited and there was a concern that maybe resources are being channeled in this instance towards issues that may not be as critical in the education sector which speaks to the failure to prioritise. On this sentiment it was further advised that the Ministry should maybe consider the re-prioritisation of resources towards issues that really impeded progress in the education sector on actual facts rather than hypotheses. The importance of risk mitigation was emphasized in response and a point of the value of risk preparedness as opposed to managing the eventuality in due course was made.

1.3 What are the Possible Interventions you would like to see being implemented *to prevent or minimise the impacts?* (e.g., E-waste management, protection of Women against GBV/SEA, special considerations for minority groups, upholding of occupational health standards; etc.)

The mitigation measures were not proposed. The rationale was premised on the understanding of the impact of these discussed issues that the environment of operation at the majority of schools in Lesotho is already difficult with the difficult terrain, bad weather, village level conflict at schools, poverty levels, gender related issues. However the team agreed that they would further consider these issues and explore is maybe they could have solutions given time.

c) Review and summary discussions of the issues to consider and social and environmental needs and the shared tool.

The collective agreed that they would take time to review the overall tool and consider solutions to manage these. To facilitate this process, it was agreed that the tools would be filled by the participants and all other members of the LEG to beef up a strategy to mitigate against E&S impacts and also to explore other likely impacts that may not have been mentioned in the meeting.

d) Way forward

Participants will send through filled tools for consolidation.

APPENDIX 4 SAFEGUARDS CHECKLIST FOR GENERAL SUPERVISION

Checklist for General Supervision Environmental and Social Safeguards Implementation

Ensure that documentation on specific sites and subprojects, environmental and social impacts monitoring reports, and reports on the status of safeguards implementation are furnished to the mission team at or before the kick-off meeting.

- Meet with key beneficiaries and other stakeholders,
- Review a random sample of subprojects, making sure all safeguards issues are evaluated,
- Get an overview of all the projects/sub-projects and their categories in terms of EIA,
- Identify projects with applicable environment safeguards,
- Identify projects with applicable social safeguards,
- Based on the reports, determine projects that have potential critical safeguards issues, and focus on those,
- Discuss findings and significant noncompliance issues, if any with the TTL and agree on correcting actions,
- Assess the project's experience in managing social and environmental risks,
- Field visit to review recently completed subprojects, where possible review project proposals and impact monitoring records
- Assess the use of environmental and social screening checklists contained in the Environmental and Social Management Framework (ESMF) for proposed sub-projects/investments,
- Assess implementing agencies' awareness and use of ESMF,
- Find out if there is an established ESMF/RPF monitoring and tracking system to ensure effective oversight of project activities at the national level,
- Identify weaknesses in procedures, internal control mechanisms, supervision, and post reviews,
- Has there been/Is there any training plan to improve the awareness and capacity of implementing agencies on the use of ESMF and RPF,
- Find out if there is an Environmental and social Officer at the District. If not, why? Any plan to recruit someone? Who is currently responsible for environmental and social issues at the district?
- Assess the borrower's capacity to plan and implement safeguard policy issues,
- Make practical recommendations for across the project-specific action plans,
- Assess the impacts from any changes in the project design or new components. If required agree upon a revised safeguards management plan, monitoring and reporting requirements,
- Agree with the borrower on additional measures required, and if non-compliance or unresolved safeguards issues remain, establish a plan for follow on supervision,

Methodology:

- Examine sub-project design, review and approval process, social and environmental safeguards compliance, quality, and effectiveness of project outputs.

APPENDIX 5 LABOUR MANAGEMENT PROCEDURES

Labour Management Procedures For the Basic Education Strengthening Project (BESP)

EXECUTIVE SUMMARY

The Labour Management Procedures (LMP) is developed to manage risks under the **Basic Education Strengthening Project (BESP)** implemented by the Ministry of Education and Training (MoET) and Ministry of Social Development MoSD, and funded by the World Bank. The LMP sets out the Program's approach to meeting national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specific objectives of Environmental and Social Standard 2: Labour and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4).

The document identifies the types of workers who will be engaged in the program with tenures of respective groups to be recruited and involved. Of whom Direct, contracted (and sub-contracted, as appropriate), and Primary Supply Workers are the major types. The document advocates for awareness-raising activities added with periodic monitoring to ensure that the standards set in this procedure are understood by all employers and workers and are then followed. However, no labour influx is expected as the project will be dispersed to many Educational institutions all over the country.

The key highlight of this document is to categorically identify, assess, and prescribe on how to address the issues of Child and Forced Labour, Gender-based Violence, and Occupational Health and Safety. The program will discourage the recruitment of children and any practices of forced labour.

The procedure specifically suggested the program's position in case of gender-based violence. It pinpoints the high chance of women (and their children) being subject to gender-based violence with the program. Hence, necessary mechanisms are in place with regular monitoring and reporting.

The LMP with includes the issue of Occupation Health and Safety ensuring appropriate implementation of the ESS4. It also covers a Grievance Redressal Mechanism. The mechanism includes Disciplinary Procedure, Individual Grievance Procedure, Collective Grievance Procedure, Gender-based Violence.

The section on Contractor Agreement introduced a high-level of standards to ensure that the ESS2 and ESS4 in place and operation truly.

1.0 INTRODUCTION

This Labour Management Procedures (LMP) was developed by the Lesotho Ministry of Education and Training (MoET) to manage risks under the **Basic Education Strengthening Project (BESP)** funded by the World Bank. The LMP sets out the Program's approach to meeting national requirements as well as the objectives of the World Bank's Environmental

and Social Framework, specific objectives of Environmental and Social Standard 2: Labour and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4).

The aim of the BESP project is to improve student retention and teaching quality in junior secondary schools and pilot a new curriculum to strengthen ECCD service delivery. The proposed project will focus on key activities that are priorities for the MoET within the context of its Education Sector Strategic Plan (ESSP), and the updated ESSP implementation plan, and build on lessons learned and opportunities arising from ongoing projects, including Lesotho Education Quality Enhancement Project (LEQEP) and Lesotho Basic Education Improvement Project (LBEIP). These include:

- (iv) improving transition to and retention of students in junior secondary education,
- (v) scaling up online teacher training program for junior secondary teachers in Mathematics and Science, and
- (vi) strengthening the delivery of ECCD services, including by piloting, and evaluating the revised ECCD curriculum and mapping ECCD service providers to improve monitoring and accountability.

Across all interventions, inclusive education will be a key cross-cutting focus area that will be supported by identifying specific strategies to ensure that all children, including those with disabilities can fully benefit from the project interventions.

The intervention areas (i.e., junior secondary and ECCD) were identified as priorities for the project for the following reasons:

- Within the basic education system, the dropout rate is the highest at the junior secondary level and is likely to worsen under the ongoing COVID-19 pandemic. The impact of the pandemic is expected to be worse at the junior secondary level as the economic impact of the lockdown is likely to make junior secondary education unaffordable for many students (junior secondary education is not free). So, the constraints on the demand and supply-sides, of the education system needs to be addressed if Lesotho is to ensure universal access to basic education.
- With the challenges related to the ongoing COVID-19 pandemic, which include the impact of health and safety measures (e.g., school closures, limitations on face-to-face training, etc.). which make integration of technology in education service delivery, including in teacher training, particularly important to mitigate against these challenges and build resilience in the education system.
- At the ECCD level, there are significant access, quality and monitoring related gaps that are affecting the delivery of early childhood education. While this project will not tackle these gaps at scale, it will provide system strengthening support in selected areas, to lay a strong foundation to improve the delivery of ECCD in the future.

The components and sub-components of the project are listed in Table 2 and described in more detail below.

1.1 Project Developmental Objective (PDO)

To improve student retention and teaching quality in junior secondary schools in targeted regions of Lesotho and pilot a new curriculum to strengthen ECCD service delivery.

1.1.1 PDO Level Indicators

The following key results will be used to measure progress towards the PDO:

- Reduction in dropout rate (Grade 8–Grade 9) in targeted regions (disaggregated by gender)
- Improvements in content knowledge and pedagogical skills of math and science teachers in targeted schools
- Improvement in a child's readiness⁹ to start primary education for children attending the pilot ECCD centres.

1.2 Project Components

To address the key sector challenges and support the achievement of the PDO, the proposed project consists of three interlinked components.

1.2.1 Component 1.

Improving student retention in junior secondary education.

This component will focus on improving transition to, and retention of, students in junior secondary education in targeted regions in Lesotho where poverty rates are high and student retention is low, as well as support improvements in Maths and Science instruction in schools located in these regions by supporting the scale-up of an existing online teacher training programs that has shown to improve student learning. To this end, the component will: (a) provide assistance to families to address financial barriers to secondary education, (b) support adolescent boys and girls through youth clubs and equip them with relevant life-skills and reproductive health knowledge to ensure that they stay in school, and (c) support online teacher training for Mathematics and Science teachers in junior secondary schools to improve the quality of teaching including related to remedial education such as continuous assessment of students to understand their level of learning and where they need additional support.

1.2.2 Component 2.

System strengthening to improve ECCD service delivery.

This component will focus on selected intervention to strengthen ECCD service delivery in Lesotho including by piloting and evaluating the new ECCD curriculum in reception classes and ECCD centres and mapping ECCD providers and building a monitoring and support system to better manage the sub-sector.

1.2.3 Component 3.

Project management, capacity building and technical assistance

The objective of this component is to strengthen institutional capacity of the MoET, which is the main implementer of most project interventions. Specifically, the component will provide support to strengthen key management and technical areas to ensure that MoET is able to effectively implement the project interventions and improve student retention in the target areas. Both under the MoET and MoSD, existing project facilitation units (PFUs) will be used to jointly coordinate the project implementation by supporting the

⁹ Measured by the child direct assessment score which consists of: (i) literacy/language, (ii) mathematics/numeracy, (iii) executive function, and (iv) fine motor skills following the MELQO child assessment tool.

implementing departments under their respective ministries.

2.0 OVERVIEW OF LABOUR ON THE BESP PROJECT

The LMP is applicable, as per ESS 2 to all the BESP Project workers as per the following condition:

- People employed or engaged directly by BESP to work specifically in relation to the Project,
- The Government public servants, who may provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement,
- People employed or engaged by Consultants to perform work related to core function of the Project, regardless of location,
- People employed or engaged by BESP's primary suppliers,

2.1 Labour Requirements

2.1.1 Direct Workers:

Direct workers include, the PFU staff, Program-based Staffs and Permanent MoET Staffs. The PFU will employ consultants and support staff who are working on contractual bases as part of the PFU. Terms and conditions of these consultants are guided by the Labour Code Order. In addition, the civil servants (MoET Staff) at the local level will be involved in the program implementation on a full time or on part-time basis. The consultants will be engaged by the Program to undertake short period assignments as necessary. These are consultants guided by specific contractual agreements between them and BESP.

Direct workers are eligible to work for a fixed contract period of not more than 1 year. Contracts will be renewed for another/ next year based on satisfactory services. Consultants will be engaged under a short-term period of not more than six months and the labour requirement including the time schedule and deliverables are stipulated in their respective contracts.

The BESP has established a Project Facilitation Unit (PFU) to oversee the Project. The Unit will engage throughout the Project the following personnel:

- Project Coordinator,
- Administrator,
- Procurement Specialist,
- Project Accountant,
- Internal Auditor,
- Monitoring and Evaluation Specialist,
- Environmental and Social Specialist,
- Driver.

Additional staffing may be needed during the Project Implementation. The following officers have been identified as needed:

- Community Liaison Officers
- Social and Gender Specialist

2.1.2 Contracted Workers:

Based on the requirement in every component the PFU will employ contractors who will hire contracted workers based on their level of skills and program needs. If agreed with the PFU, sub-contracts of the work could be given. Sub-contractors recruited may supply labourers as per the agreed terms and conditions.

Contracted workers are eligible to work for a contract period fixed by the PFU, and then recruited by the Contractor. Their contracts will be renewed, if required, based on satisfactory services.

2.1.3 Primary Supply Workers:

Based on the requirement in every component primary supply workers will be recruited by the suppliers as required. It will be ensured (and monitored periodically by the PFU) that no children are recruited and supplied as worker. Furthermore, it will be monitored like above that these workers are not subject to 'forced labour' in any manner. The PFU will be responsible to make sure that these standards are followed strictly. If any deviation is identified the PFU will take action as prescribed in the contract/ agreement following the LMP.

Their tenure service will be based on supplies as procured.

3.0 ASSESSMENT OF POTENTIAL LABOUR RISKS

The main labour risks associated with the Project are assessed to be related to the potentially hazardous work environment and associated risks of accidents. Based on current conditions in the sector it is assessed that the risk of child or forced labour is negligible, and already managed through national legislation.

The MoET has developed this LMP as part of the ESMF which will illustrate the types of workers to be engaged and their management in line with ESS2 and national labour laws and regulations. Even though labour influx is not anticipated, social impacts such as GBV, sexual exploitation and communicable diseases for local communities cannot be ruled out. Thus, management and mitigation of GBV/SEA risks were integrated in both the stakeholder engagement and LMP.

Based on current conditions in the Education sector, it is assessed that the risk of child or forced labour is negligible, and already managed through national legislation.

3.1 Labour Influx

It is not expected that there will be any labour influx in any project community. The BESP will mandate and localize the economic benefits and only allow for outside, including expatriate labour, where there is a requirement for special skills. There will be no dedicated camps established for worker accommodation in the Project.

Specific requirements to manage risks associated with labour influx, related to interaction between project workers and local communities, such as communicable diseases and gender-based violence, are managed through contractual requirements, Code of Conduct

and training set out in this document. These procedures are guided by the national legislation.

3.2 Occupational Health and Safety:

The Occupational health and Safety measures and actions will be developed and implemented to assess and manage risks and impacts to the community arising from Project activities and workers. The consultants to be engaged will ensure that their employees/staff will be trained on occupational health and safety and records of which are to be inspected monthly and audited bi-annual.

3.3 Gender-based violence:

Based on the Bank's GBV/SEA/SH country-level risk assessment rating, the social risks of Sexual Exploitation/Harassment and GBV are rated as moderate, and the project will not directly or indirectly cause or contribute to any of the pre-existing social issues related to gender-based violence but will attempt to ultimately contribute to their mitigation through improving educational outcomes and school retention rates for girls and boys.

Nonetheless, there is a possibility of contextual risks of GBV and there is need to uphold safe environment at schools and implement the GBV Action Plan in this ESMF.

3.4 Child and Forced Labour:

The risk of child labour will be very minimal and will be mitigated through Certification of laborers' age. This will be done by using the legally recognized documents such as the National Identification Card, and Birth Certificate. Further, awareness-raising sessions will be conducted regularly to the communities to sensitize on prohibition and negative impacts of child and forced Labour. In addition, this procedure will guide the authority to monitor periodically that no such practice is/ are in place by BESP.

4.0 OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

There are several pieces of legislation which deal with in Lesotho. These include the following:

- Constitution of Lesotho 1998
- Labour Code, 1992
- Labour Code Amendment Act 2006
- Workmen's Compensation Act 1977
- Workmen's Compensation Regulations, 2014
- Children's Protection and Welfare Act, 2011
- Education Act 2010

4.1 Constitution of Lesotho 1998

The Constitution of Lesotho is the parent legislation for all the other legislation and gives the direction they take. The following sections provide for Labour issues:

- **Section 9** of the Constitution provides for the Freedom from slavery and forced labour. It states that no person shall be held in slavery or servitude and prohibits slavery. It further state that no person shall be required to perform forced labour.
- **Section 29** of the Constitution provides for the "Opportunity to work" for

every MoSotho. Thus, everyone must have an opportunity to gain his living by work which he freely chooses or accepts.

- **Section 30** of the Constitution provides for “Just and favourable conditions of work”. It makes sure that Lesotho adopts policies aimed at securing just and favourable conditions of work and in particular policies directed to achieving safe and healthy working conditions, among other things.
- **Section 31** of the Constitution provides for Protection of workers' rights and interests. According to this provision, Lesotho shall take appropriate steps in order to encourage the formation of independent trade unions to protect workers' rights and interests and to promote sound labour relations and fair employment practices.
- **Section 32** of the Constitution provides for the Protection of children and young persons from Child labour, sets limits on employment of children and young persons in work harmful to their morals or health or dangerous to life or likely to hamper their normal development and sets limits on employment of children. There are age limits below which the paid employment of children and young persons is prohibited and punishable by law.

4.2 Labour Code, 1992 and its Amendments (2006)

This is the main legislation in the Kingdom of Lesotho dedicated to Labour issues, consisting of the:

- Labour Code Amendment Act 2000 – Established the Directorate of Dispute Prevention and Resolutions (DDPR) and a Labour Appeal Court,
- Labour Code Amendment Act 2006 – made a provision for HIV and AIDS in the workplace and transferred the review powers from the Labour Appeal Court to the Labour Court.

The labour code applies to any employment in the private sector and to any employment by or under the government, or by or under any public authority, while disciplined forces are exempt. It sets out provisions that cover a large spectrum of employer employee relationship. The provisions include among others, health, safety, and welfare at work; covers employment of women, young persons and children and provides for unfair labour practices and settlement of trade disputes.

The Labour Code sets extremely specific requirements for different classes of workers, contract and non-contract workers in the education and other sectors. It is critical that issues of workers are handled properly to avoid incidents of labour contentions leading to social disruptions, abandonment of work, posing a high risk to both society and the environment.

In general, it lays down the rules on working conditions, in particular the protection of the health and safety of workers. Among other things, it states: employers’ obligations, workers’ rights, settlement of disputes, disputes of rights, code of good practice.

4.2.1 Occupational Health and Safety

The Labour Code Order of 1992 also provides for occupational health and safety in the Kingdom of Lesotho in Part VII: Health and Safety and Welfare at Work. 92: Application; 93: Duties of employers; 94: Duties of employees; 95: Duties of Designers, manufactures, importers etc.; 96: Keeping of documents; 97: Safety and Health Officers; 98: Safety and Health committees; 99: Prohibition orders; 100: Regulations; 101: Notification of industrial accidents and dangerous occurrences; 102: Notification of Industrial deceases; 103: Training and supervision of persons working at dangerous machines; 104: Fire prevention, Fire-fighting; 105: Prohibited and toxic substances; 106: Removal of dust or fumes; 107: Reduction of noise and vibrations; 108: Lifting of weights; 109: Personal protective equipment and clothing; 110: Water Supply; 111: Registration of factories; 112: Cancellation of registration; 113: Appeal form decision; 114: Removal of nuisance in or near a factory; 115: Employer provided housing and 116: Penalties.

4.3 Workmen's Compensation Act 1977 and Workmen's Compensation Regulations, 2014

The Workmen's Compensation Act No.13 of 1977 is the law relating to injuries and death of workmen suffered in the course of their duties. The Act states that an Employer should insure his workmen and himself in respect of all liability which he may incur under the provisions of the Act. It further states that an employer who fails to insure will be found guilty of an offence and liable to a fine of M300.00 or 12 months imprisonment or both.

The workers that are covered under the act include the following:

- Any person who has entered into a contract of employment with an employer whether oral or in writing.
- Any person who has entered into an apprenticeship with an employer.
- Person employed by Government.

4.4 Children's Protection and Welfare Act, 2011

The objectives of the Children's Protection and Welfare Act, 2011 are to extend, promote and protect the rights of children as defined in the 1989 United Nations Convention on the Rights of the Child, the 1990 African Charter on the Rights and Welfare of the Child and other international protocols.

The Acts provides for several rifghts of the Child inckuding the rights of opinion, right to protection from torture and degrading treatment and right to protection from exploitative labour. So Child labour is prohibited under Lesotho legislation.

4.5 Education Act 2010

The education Act pursues the principle of provision of education to the people of Lesotho, by ensuring that every child is provided with opportunities and facilities to enable him to develop physically, mentally, morally, spiritually, and socially in a healthy, normal manner and in conditions of freedom and dignity accommodating all state of impairment.

While BESP build additional infrastructure (classrooms, latrines playgrounds) for provision of conducive learning environment it is critical to ensure that proper mitigation/rehabilitation measures are implemented at all construction sites. This will have the effect that the negative environmental impacts are restored.

PART X of the act deals with the appointment of teachers covering the following labour issues:

- Appointment of a teacher other than a teacher paid by the Government
- Terms and conditions of service of teachers.
- Secondment of teachers
- Whole time of teacher at disposal of school
- Private employment and Private interest

Thus, it covers the whole spectrum of the conditions of service for teachers.

4.0 RESPONSIBLE STAFF AND PROCEDURES

The Ministry of Education and Training (MoET) and Ministry of Social Development MoSD project Facilitation Units (PFU) will have the overall responsibility to oversee all aspects of the implementation of the BESP, in particular to ensure contractor compliance. The project will be implemented by the MoET except for the sub-component 1.1, which will be implemented by the Ministry of Social Development (MoSD), thus MoET will address all BESP aspects as part of procurement for works as well as during contractor induction. The contractors will subsequently be responsible for management of labour issues in accordance with contract specific labour Management Plans, implementation of which will be supervised by the MoET PFU on a monthly basis or at shorter intervals as defined by specific Plans. The detailed approach is described in the following sections.

4.1 Occupational Health and Safety.

The BESP Environmental Specialist must ensure that the implementation of BESP will be conducted in compliance to occupational health and safety requirements. The BESP Environmental Specialist will make sure that each participating institution receives the template OHS programs, establish safety representatives for day-to-day monitoring of safety requirements, record and report all incidents accordingly to the BESP.

4.2 Labour and Working Conditions.

Government civil servants, who may provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement and teachers will be controlled by the provisions of the Education act. In addition to these the COVID – 19 regulations 2020 will also apply.

4.3 Contractors Occupational Health and Safety.

Contractors must engage a minimum of one safety representative. Smaller contracts may permit for the safety representative to carry out other assignments as well. The safety representative will ensure the day-to-day compliance with specified safety measures and records of any incidents are done. Minor incidents are reported to the MoET on a monthly basis; serious incidents are reported immediately. Minor incidents are reflected in the quarterly reports to the World Bank; major issues are flagged to the World Bank immediately.

4.4 Contractor Labour and Working Conditions.

Contractors will keep records in accordance with specifications set out in this LMP. The MoET may at any time require records to ensure that labour conditions are met. The PFU will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

4.5 Worker Grievances.

The MoET's procedures currently in place will remain for Project staff. Contractors will be required to present a worker grievance redress mechanism which responds to the minimum requirements in this LMP. The PFU's Social Officer will review records on a monthly basis. Where worker concerns are not resolved, the national system will be used as set out in the section, but the PFU will keep abreast of resolutions and reflect them in quarterly reports to the World Bank.

4.6 Additional Training.

Contractors are required to, at all times, have a qualified safety officer on board. If training is required, this will be the contractor's responsibility. The safety officer will provide instructions to contractor staff. MoET will provide training to address risks associated with labour influx and will provide a schedule for trainings required. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required by MoET, as specified by the contract.

5.0 POLICIES AND PROCEDURES

The engagement and treatment of program staff will be made on the basis of characteristics related to inherent job requirements. It will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.

Contractors will be responsible for mitigating all environmental and social impacts of subprojects resulting from activities directly under their control. The MoET Environmental Specialist will incorporate standardized environmental and social clauses in the tender and contract documents in order for potential bidders to be aware of environmental and social performance requirements that will be expected from them and are able to reflect that in their bids and required to implement the clauses for the duration of the contract. The MoET will enforce compliance by contractors with these clauses.

The contractor will be required to ensure that all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the MoET or its appointed agents. The contractual arrangements with each project worker must be clearly defined in accordance with Lesotho Legislation. All environmental and social requirements will be included in the

bidding documents and contracts in addition to any additional clauses, which are contained, in the Projects environmental and social instruments.

The MoET, PFU, Contractors, suppliers or sub-contractors will never engage forced labour. Forced labour includes bonded labour (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

5.1 labour Influx and Gender Based Violence

Contractors will need to maintain labour relations with local communities through a code of conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behaviour. The CoC must include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC should be written in plain language and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract;
- Had the CoC explained to them as part of induction process;
- Acknowledged that adherence to this CoC is a mandatory condition of employment;
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in English and S Setsoto.

Contractors must address the risk of gender-based violence, through: Mandatory training and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated;

- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence;
- Developing a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.

This process will be under the portfolio of the Environmental Specialist to be recruited under the PFU and shall identify and engage the relevant stakeholders on GBV and HIV and Aids related issues.

5.2 Occupational, Health and Safety

BESP is committed to:

- Complying with legislation and other applicable requirements which relate to the occupational health and safety hazards.
- Enabling active participation in OH&S risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
- Continually improving the OH&S management system and performance.
- Communicating this policy statement to all persons working under the control of BESP with emphasis on individual OH&S responsibilities.
- Availing this policy statement to all interested parties at all participating educational facilities and institutions.

The BESP Environmental Specialist will be responsible for overseeing the workplace Safety, Health and Environmental issues. He/she must:

- Identify potential hazards;
- In collaboration with the employer, investigate the cause of accidents at the workplace;
- Attend meetings of the safety and health committee to which that safety and health representative is a member;
- Make recommendations to the employer in respect of safety and health matters affecting employees.

Further to avoid work related accidents and injuries, the contractor will:

- Provide occupational health and safety training to all employees involved in BESP works.
- Ensure availability of first aid box.
- Provide employees with access to toilets and potable drinking water.
- Provide safety and occupational safety measures to workers with Personal Protection Equipment (PPE) when installing solar systems to prevent accidents during replacement and installation and follow safety measures in installing them.
- Properly dispose of solid waste at designated permitted sites landfill allocated by the local authorities.

Further to enforcing the compliance of environmental management, contractors are responsible and liable of safety of site equipment, labours and daily workers attending to the site installations and safety of citizens for each sub-project site, as mandatory measures.

6.0 AGE OF EMPLOYMENT

Lesotho has ratified The African Charter on the Rights and welfare of the Children (also known as ACRWC or Children's Charter) was adopted by the Organisation of African Union (OAU) in 1990 and was entered into force in 1999. Lesotho has also ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182). The ACRWC, C138, C182 prohibit employment of children under the age of 18.

The minimum age of employment for this project shall be 18 years and to ensure compliance, all employees will be required to produce National Identification Cards as

proof of their identity and age which is the national identification required for employment.

If any consultant employs a person under the age of 18 years, that consultant will not only be terminated but also reported to the authorities.

7.0 TERMS AND CONDITIONS

The terms and conditions of employment in terms of this project are governed by the provisions of The Labour Code Order 1992, Part V and the Education Act 2020, Part X. which makes it mandatory for employers to give its employees a copy of the written particulars of employment with definite agreements spelt out. This requirement however is not applicable to casual employees. For this project, contractors will be required to provide all its employees with written particular of employment, including casual employees.

Contractors will also be required to comply with the most current Regulation of Wages Order for their particular sector, e.g., the Building and Construction Industry which is issued by the Government and reviewed on a regular basis. The Wages Order specifies the minimum wages, hours of work, overtime pay, leave entitlements, travelling and subsistence allowances, and the issue of protective clothing.

7.1 Worker's Organization

Lesotho has ratified the numerous ILO Conventions aimed at ensuring that member states protect the notion of collective bargaining. These Conventions include: ILO Convention 87 on Freedom of Association and Protection of the Right to Organize and ILO Convention 98 on the Right to Organize and Collective Bargaining.

Section 31. of The Constitution of Lesotho provides for the Protection of workers' rights and interests Lesotho shall take appropriate steps in order to encourage the formation of independent trade unions to protect workers' rights and interests and to promote sound labour relations and fair employment practices. This guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation.

The Labour Code Order 1992 regulates both the employers and employees respectively on proper procedures in all aspects of **industrial relations** It also gives effect to the collective bargaining, amongst other purposes. and allows for the collective negotiation of terms and conditions of employment.

The MoET provides employees with the right to join and form an organization for purpose of labour representation.

8.0 DISCIPLINARY PROCEDURES AND GRIEVANCE MECHANISM

In any working environment it is essential for both employers and employees to be fully conversant with all aspects of disciplinary processes, the grievance handling procedures

and the legal requirements and rights involved. In implementing an effective dispute management system consideration must be given to the disputes resulting from the following:

- Disciplinary Action
- Grievance Redress Mechanism (GRM)

8.1 Disciplinary Procedure

The starting point for all disciplinary action is rules. These rules may be implied or explicit and of course will vary from workplace to workplace. Some rules are implied in the contract of employment (e.g., ruling against use of alcohol and drugs at workplace), however it is advisable that even implied rules be included in the disciplinary code or schedule of offences. Therefore, the workplace rules must be:

- Valid and reasonable
- Clear and unambiguous
- The employee must understand the procedure to be applied if he/she contravenes any of the rules.

A comprehensive Grievance Redress Mechanism has been developed for the project, however the following dispute resolution procedures at workplace will be as follows:

- Conducting of a comprehensive investigation to determine whether there are grounds for a hearing to be held.
- If a hearing is to be held, the employer is to notify the employee of the allegations using a language that the employee can understand.
- The employee is to be given reasonable time to prepare for the hearing and to be represented by a fellow employee or lawyer.
- The employee must be given an opportunity to respond to the allegations, question the witnesses of the employer and to lead witnesses.
- If an employee fails to attend the hearing the employer may proceed with the hearing in the absence of the employee.
- The hearing must be held and concluded within a reasonable time and is to be chaired by an impartial representative.
- If an employee is dismissed, it must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal to the labour Court.

Therefore, it is incumbent upon the Consultants/Contractor to ensure that they have a disciplinary procedure and Code and Standards which the employees are aware of. Each Consultant/Contractor will be required to produce this procedure to ensure that employees are not treated unfairly.

8.2 Individual Grievance Procedure

Termination of Employment requires every employer, including contractors, to have a Formal Grievance Procedure which should be known and explained to the employee. Such procedure should at least:

- a) Specify to whom the employee should lodge the grievance;
- b) Refer to time frames to allow the grievance to be dealt with expeditiously;
- c) Allow the person to refer the grievance to a more senior level within the

- organization, if it is not resolved at the lowest level;
- d) If a grievance is not resolved the employee has the right to lodge a dispute with the employer.

All the contractors who will be engaged for the project will be required to produce their grievance procedure as a requirement for tender which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, is confidential, adheres to non-retribution practices and includes the right to representation. After they are engaged, they will be required to produce proof that each employee has been inducted and signed that they have been inducted on the procedure.

8.3 Collective Grievances and Disputes Resulting from the Negotiations of Collective Agreements

Where a trade union is recognized, it is entitled to negotiate on a regular basis with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with it. The procedures followed in such instances is usually contained in the Recognition Agreement, which states how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiation and the procedure to deal with issues that are not resolved through consensus. Part XVIII of the Labour Code Order 1992, deals with the handling of collective grievances as raised by the employees.

8.4 Gender-based Violence, Sexual Exploitation and Workplace Sexual Harassment

Violence and harassment in the work world deprives people of their dignity, is incompatible with decent work, and a threat to equal opportunities and to safe, healthy, and productive working environments. It remains a widespread phenomenon, present in all countries and disregarding sectors, occupations and workplace arrangements. Convention No. 190 and Recommendation No. 206 recognizes the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment.

9.0 CONTRACTOR MANAGEMENT

The MoET will requires that contractors monitor, keep records and report on terms and conditions related to labour management. The contractor must provide workers with evidence of all payments made, including social security benefits, pension contributions or other entitlements regardless of the worker being engaged on a fixed term contract, full-time, part- time or temporarily. The application of this requirement will be proportionate to the activities and to the size of the contract, in a manner acceptable to the MoET and the World Bank:

- **Labour conditions:** records of workers engaged under the Project, including contracts, registry of induction of workers including CoC, hours worked, remuneration and deductions (including overtime), collective bargaining agreements.
- **Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example,

revised job safety analysis, new or different equipment, skills training, and so forth).

- **Workers:** number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- **Training/induction:** dates, number of trainees, and topics.
- **Details of any security risks:** details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project.
- **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

Every Safety File is 'site-specific'. It will be compiled following the client's and the site's safety specifications. The overall information requirements remain the same, and the site-specific documents will be added. When Health and Safety File is set up, it will consist of the following Documents:

- Contractor appointment letter.
- Notification of Construction Work
- Copy of the OHS regulations
- Occupational Health and Safety Management Plan
- Company Occupational Health and Safety Policy
- Letter of Good Standing
- Material Safety Data Sheets for hazardous materials used (if required)
- Tax Clearance Certificate
- Risk Assessments
- Safe work procedures (Site Specific)
- Fall Protection Plan (if required)
- Legal appointment with proof of training (Ex. Chief Executive Officer, Risk Assessor, First Aider, etc.)
- Incident Reporting Procedures
- Incident Reports
- Incident Registers
- Reports of Accidents
- Emergency Preparedness Documents
- First Aid Documents
- Induction Records
- Medical Surveillance Records
- Safety Communication (e.g., Toolbox talks)
- Minutes of Safety Meetings
- Inspection Registers

10.0 COMMUNITY WORKERS

(There will be no provision for Community Workers.)

11.0 PRIMARY SUPPLY WORKERS

This section addresses labour management risk associated with people employed or engaged by MoET's primary suppliers. Primary suppliers are suppliers who, on an ongoing basis, provide goods or materials directly to the Project.

The project will require procurement of a substantial number of materials, including protection and control equipment, power-poles, steel products, Solar products, computer products etc.

All primary suppliers are formal businesses who are required to procure and produce materials subject to high standards.

APPENDIX 6 TEMPLATE FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Table APP 6 Template for Environmental and Social Management Plan

Name of Sub-project..... Address				
Description.....				
Environmental and Social Elements	Impacts	Proposed mitigation measures ¹¹	Institutional responsibility for mitigation	Cost of mitigation activities ¹²
Construction period				
Physical Environment				
Increased <i>generation of</i> hazardous waste, like old batteries	Pollution of soils, and water			
Increased <i>generation of</i> solid wastes from solar panels.	Pollution of the environment			
Increased <i>generation of</i> E-waste generation from end of life of laptops, solar panels, etc.	<ul style="list-style-type: none"> • Pollution of the environment from toxic components from computers, e.g., Mercury • Potential for Hazardous waste pollution. • Littering and indiscriminate dumping of solid waste 			
Social Environment				
Targeting: no clear selection criteria of project beneficiary areas	<ul style="list-style-type: none"> • Conflict within communities • Perpetuating gender inequalities 			
Poor Project Inception, Anxiety and Anticipation	<ul style="list-style-type: none"> • Anxiety and anticipation Limited cooperation • Suspicion and hence concealing important of information. 			

Limited Stakeholder Participation	<ul style="list-style-type: none"> • Low chances of success and sustainability • Failure to take up ownership of the project • Lack of Project ownership by MoET Staff 			
Occupational Health and Safety Issues	<ul style="list-style-type: none"> • Temporary and permanent physical injuries. • Safety and health of staff and population 			
Changes in teachers' workloads	<ul style="list-style-type: none"> • Unacceptable increase in teachers' workloads, • Teachers perpetuating stereotypes and cultural norms that discourage girls' interest in mathematics and science. • Teachers request sex from female students in return for passing grades. 			
GBV/SEA risks	<ul style="list-style-type: none"> • Physical body harm • Lack of productivity • Communicable disease incidences 			

APPENDIX 7 TEMPLATE FOR ENVIRONMENTAL AND SOCIAL MONITORING PLAN

Table APP 7 Template for Environmental Monitoring Plan

Phase	What will be monitored? <i>Which parameter will be controlled?</i>	Where is the monitoring expected to take place? <i>Specify the monitoring location for each selected parameter</i>	How will the monitoring be performed? <i>How will measurements be done?</i>	When is the monitoring expected to take place? <i>At which intervals or ongoing</i>	Who will perform the monitoring? <i>Specify persons responsible for the monitoring for each parameter</i>	Monitoring cost <i>Specify expenses associated with the monitoring, unless they are included in the project budget</i>
Design stage	Availability of Waste disposal sites	At the site and its vicinity		Before launch of Installations		
	Gender Issues	At the site and its vicinity		Before launch of Installations		
Project Establishment stage	Solid Waste management	School/Education institutions		Continuous, at least on a monthly basis		
	Hazardous and toxic E-waste	School/Education institutions		Continuous, at least on a monthly basis		
	Safety of students/staff/personnel	School/Education institutions		Quarterly		
	Occupational health and safety (OHS), and Community Transmission and Exposure	School/Education institutions		Quarterly		
	<i>Adequacy of Stakeholder Participation</i>	School/Education institutions and surroundings.		Quarterly		
	GBV/SEA and other Risks to vulnerable Groups	Onsite and surrounding neighbourhood		Continuous, at least on a monthly basis		
Operation stage	Solid Waste management	School/Education institutions and surroundings		Continuous, at least on a monthly basis		
	Hazardous and toxic E-waste	School/Education institutions and surroundings		Continuous, at least on a monthly basis		
	Complete Waste removal and orderly disposal	School/Education institutions and surroundings		Continuous, at least on a monthly basis		
	GBV/SEA and other Risks to vulnerable Groups	Onsite and surroundings		Continuous, at least on a monthly basis		

APPENDIX 8 SIGNIFICANCE RATING TABLE

The significance of adverse impacts from project activities will be rated based on their magnitude, duration and probability as shown below in Table APP 10-1. The scales of rating are 1 to 5 with 1 being low and 5 being high. Where an aspect is affected by more than one impact, the highest rating is taken as the applicable significance of the impact.

Table APP 9-1 Impact Magnitude Scoring Table. (adapted from Edwards R, 2011)

<i>Criteria</i>	<i>Scoring</i>	<i>Description</i>
Quality		Nature of Environmental Change
<i>Positive</i>	N/A	Beneficial impacts
<i>Negative</i>	N/A	Adverse Impacts
Probability		the likelihood of the impact occurring
Unlikely	1	The chance of the impact occurring is extremely low (Less than a 20% chance of occurrence).
Fairly Unlikely	2	The chance of the impact occurring is moderately low (Between a 20% to 40% chance of occurrence).
Possible	3	The impact may occur (Between a 40% to 60% chance of occurrence).
Probable	4	The impact will likely occur (Between a 60% to 80% chance of occurrence).
Definite	5	Impact will certainly occur (Greater than an 80% chance of occurrence).
Severity		The degree of disturbance
Very Low	1	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
Low	2	Impact alters the quality, use and integrity of the system/component but system/ component continues to function in a slightly modified way and maintains original integrity (no/limited impact on integrity).
Moderate	3	Impact alters the quality, use and integrity of the system/component but system/component continues to function in a moderately modified way and maintains general integrity.
High	4	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
Very High	5	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired (system collapse). Rehabilitation and remediation often impossible. If possible, rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
Extent		the spatial influence of the effects produced by the impact.
Project Area (Site)	1	Effects of an impact experienced within or in proximity (100m) to the project site. However, the size of the site needs to be considered. A large site may have to be scored according to category 2 below.
Surrounding Area	2	Effects of an impact experienced beyond the project site but within a 2km radius of the site.
Local	3	Effects of an impact experienced within the local area (e.g., between a 2km to 50km radius of the site).
Regional (Provincial)	4	Effects of an impact experienced within the local region (e.g., between a 50km

Criteria	Scoring	Description
		to 200km radius of the site).
National (larger area)	5	Effects of an impact experienced within a large geographic area beyond a 200km radius of the site.
Duration		Period when the Impact is Expected to Occur
Short-term	1	The impact and its effects will either disappear with mitigation or will be mitigated through natural process in a span shorter than the construction phase (0 – 1 years), or the impact and its effects will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
Medium-Short-term	2	The impact and its effects will continue or last for the period of a relatively long construction period and/or a limited recovery time after this construction period, thereafter it will be entirely negated (2 – 5 years).
Medium-Long-term	3	The impact and its effects will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (5 – 15 years)
Long-term	4	The impact and its effects will continue or last for the entire operational life of the development but will be mitigated by direct human action or by natural processes thereafter (15 – 50 years).
Permanent	5	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered transient (Indefinite).
Magnitude		Effect on Environmental and Social Processes
Negligible	< 6	Not Serious: Changes are barely perceptible.
Low	6-12	Acceptable but Undesirable.
Moderate	13-17	Very Serious:
High	>17	Totally Unacceptable.

Note: Probability + Severity + Extent + Duration = Magnitude

APPENDIX 9 SOLID, HAZARDOUS AND E-WASTE MANAGEMENT PLAN



THE KINGDOM OF LESOTHO

SOLID, HAZARDOUS AND E-WASTE MANAGEMENT PLAN

BASIC EDUCATION STRENGTHENING PROJECT (BESP)

1.0 INTRODUCTION

The purpose of the Waste Management Plan is to describe the principles, procedures and management of the Solid, Hazardous and E-waste that will be generated by the BESP programme at all the schools that will be involved in the project. The plan has been developed to ensure the wastes are reduced, reused, and recycled wherever possible.

In accordance with requirements of the Environment Act, the Waste Management Plan outlines measures to manage and mitigate waste generation and resource consumption during the operation of the development. The Plan includes details on the following:

- The types and quantities of waste generated during operation,
- Procedures to collect and dispose of waste,
- Measures that will be implemented to minimise waste generation associated with the project, and
- A program for monitoring the effectiveness of these measures.

The Waste Management Plan is designed to support an ecological based management approach underpinned by adaptive management principles.

This Plan also considers other aspects to waste management such as waste reduction, segregation of waste, disposal of waste, financial impacts of waste disposal and recording, monitoring, education and reviewing. This Plan outlines the waste management procedures that have been put in place and demonstrate the benefits to the environment, how we can measure the effects and how these procedures and practices are sustainable.

2.0 WASTE TYPES

The implementation of the BESP will generate a range of wastes, including end of life e-waste from computers and laptops, contaminated/hazardous electronic wastes, and solid waste from solar panels, that will be purchased by the project.

2.1 Waste Categories

Table 1 provides an overview of the potential wastes, their classification, and avenues of disposal.

Table 1: Waste types and waste management practices

Waste Types	Waste Form	Waste Stream and Disposal	Waste Handling
e-waste from computers	Solid	Recycling, Re-use landfill	Department of Environment (DoE) Approved Contractor
e-waste, hazardous waste and solid waste from solar panels.	Solid	Landfill (soiled) Reuse recycling	Location waste transfer station or Contractor
Paper Waste	Solid	Landfill (soiled) Reuse recycling	Location waste transfer station or Contractor
Plastic Packaging	Solid	Recycling, landfill	Recycling depot
Cardboard Packaging	Solid	Recycling, landfill	Recycling depot
Other solid waste from solar panels	Solid	Recycling, Reuse landfill	Contracted Approved disposal Services
Old batteries from solar systems	Liquid	Recycling, landfill	Approved Contractor

Waste materials fall into four categories for management, which include:

- Re use,
- Recycle,
- Residual wastes, and
- Landfill.

2.1.1 Re-use

If surplus materials can be used in future operations they are classified as materials which can be re-used, i.e., rope off cuts and spare netting. Materials that can be reused in their present form are surplus to requirements and need to be removed from site will be reused. The surplus products will be labelled, and storage area recorded for future reference.

2.1.2 Recycling

If surplus materials cannot be reused in their present form but could be used in a different form, they will be sent to recycling or labelled as future recycling i.e., damaged stock.

2.1.3 Residual Waste

Residual waste can come in several forms including:

- Waste that cannot be disposed of due to its category, class or material (e.g., computer components). Ways of reusing or disposing of the waste from the site needs to found, and
- Unused machinery, spare parts, or discarded parts. All items of this nature will be identified and dated. These items will be assessed quarterly to gauge their importance for potential future use. Once an item is deemed to have little or no future potential to be utilised, it will be either assessed for reuse in another form or disposed of from the site.

Residual waste can be an eyesore, fire hazard and has potential to impact on the environment through leachates. All residual wastes will be identified, and new residual wastes will be added to the residual waste catalogue for quarterly auditing. Residual wastes that are deemed essential or have the potential for future use will be stored in a neat and tidy manner and where possible under cover to avoid or reduce the potential for further corrosion or damage to the product.

2.1.4 Landfill

If the above options cannot be satisfied, then the only alternative left is to send the surplus materials to landfill.

3.0 WASTE COLLECTION AND DISPOSAL

3.1 Old Batteries

Storage of old batteries will be held to an absolute minimum at the schools or education facilities. They should be stored within impervious bunds. Adequate absorption materials shall be readily available to collect and recover any liquid leakages from the batteries.

3.2 Contaminated / Hazardous Wastes

All materials generated from the end of life of electronic equipment, computers and laptops will be fully evaluated for potential contamination and staff should note if hazardous materials or conditions are found which may include the following:

- Toxic or contaminated materials,
- Radiation or radioactive materials,
- Noxious or explosive chemicals,

Depending on the type of material and the danger level of the material, storage and handling procedures may be required.

4.0 WASTE MINIMIZATION

Wastes from the BESP operations have the potential to impact on the environment. The Waste Management Plan has been developed to manage the risk associated with the potential impacts including minimising waste generation.

GoL and the PFU will implement all possible waste minimisation procedures and therefore reduce the amount of waste to be removed from schools and education facilities. Management, staff, design teams, contractors and suppliers will all be encouraged to look at ways to minimise the amount of waste generated at the schools and education facilities.

5.0 INDUSTRY BEST PRACTICE

BESP will follow industry best practice guidelines in handling e-wastes, such as:

- Waste materials will be reduced, reused, and recycled where possible,
- Lease infrastructure removed from the lease will be returned to shore for processing, recycling or disposal,
- General wastes will be returned to shore for processing or disposal,
- All sewage wastes will be contained on service vessels in onboard holding tanks or chemical toilets and disposed of through an approved vessel sewage discharge point on return to port, and
- Residual materials that cannot be reused or recycled will be disposed of at an approved waste management facility.

60 **BESP'S HAZARDOUS WASTES DISPOSAL PROCESS**

The Basel Convention requires that its parties ensure that they manage and dispose of hazardous wastes in an environmentally sound manner, with the ultimate responsibility for safe disposal of waste resting with the country generating it. The Convention emphasizes the following:

- promotion of the environmentally sound management of hazardous wastes,
- a lifecycle approach,
- minimization of hazardous waste generation,
- each Party to minimize hazardous wastes generation "taking into account social, technological and economic aspects,
- to ensure, to the extent possible, the availability of disposal facilities within its own territory,
- each Party to "require that hazardous wastes and other wastes subject to transboundary movement be packaged, labelled, and transported in conformity with generally accepted and recognized international rules and standards in the field of packaging, labelling, and transport, and that due account is taken of relevant internationally recognized practices."

To this end the Department of Environment (DoE), (the custodian of the environment in Lesotho) expects the project to operate in line with the requirements of this Convention and thus execute the following:

- adopt a life cycle approach to the implementation of the project so that issues are taken care of from cradle to grave,
- ensure minimization of hazardous waste generation by supplying quality equipment that has long life and putting in place protocols of handling any potential waste,
- To ensure that such wastes are disposed of at designated disposal sites,
- To establish a mechanism of returning some of the waste to the manufacturers for proper disposal,
- If any of the waste is to be transported across Lesotho's borders it must be packaged, labelled, and transported in conformity with generally accepted and recognized international rules and standards.

The PFU will be responsible for ensuring the instruction of workers and suppliers follow the requirements of the Waste Management Plan during induction processes. The induction relating to waste management will include advice on appropriate separation, handling, recycling, reuse methods to be used by all parties conducting operations at schools were applicable.

Regular toolbox meetings will include discussion of waste management issues and updates on how to minimise wastes.

The monitoring of wastes generated will provide an opportunity to review the wastes being generated and ways in which they can be reduced.

Training.

GoL recognises the need for staff and contractors to be appropriately trained in the tasks that they are to undertake to reduce the chance of wastes being produced.

7.0 MONITORING

GoL is committed to minimising the risks associated with the generation of wastes in the operation of the BESP. The monitoring of the quantity and types of wastes being generated by

the BESP operations will be recorded in the wastes logbook and always kept at each school so that regular reviews can be undertaken.

All products that are of a concern in relation to the waste being generated will be replaced where possible for products that are less wasteful and/or considered to be environmentally friendly.

The PFU will continue to review the type of surplus materials produced and where possible change the operations to minimise products that go to landfill. Recycling or reuse of wastes are a priority.

The Waste Management Plan and its importance will be communicated to the whole team regularly. Project wide updates including improved recycling amounts will be communicated and discussed at management meetings.

APPENDIX 10 GBV/SEA ACTION PLAN

GBV/SEA and Child Protection Prevention and Response Action Plan

1.0 INTRODUCTION

This Action Plan has been developed to ensure that the Project does not have any negative impacts or further perpetuate GBV/SEA. It presents operational activities as well as recommendations for GBV/SEA risk mitigation that build on existing mechanisms in the MoET. The Plan is based on existing protection, prevention and mitigation strategies and measures developed by the WB and coordinated through the MoET and its partners at the implementation of its current Lesotho Education Quality Enhancement Project (LEQEP) project.

2.0 CONTEXT OF GBV

Incidence of GBV in Lesotho presents a significant and persistent challenge. Despite important gains in advancing more equitable gender norms in **Lesotho**, as anchored in the Constitution, challenges in the promotion of gender equality across all spheres persist and incidence rates of GBV remain high.

Drivers of GBV include entrenched social norms. Harmful socio-cultural practices such as early and forced marriage, as well as female genital mutilation or circumcision (FGM/C), also persist in some parts of the country, while alcohol and substance abuse further contribute to GBV. Gains have been made in the reduction of FGM/C, in part due to legislative advances and public awareness campaigns. Poverty and unemployment are also key drivers of GBV, as associated stress and frustration often manifest in negative coping behaviors including aggression and violence, particularly in the home.

A culture of silence around experiences of GBV prevails across the country. This is influenced by socio-cultural norms that both stigmatize survivors, justify and normalize perpetration of violence, particularly in the home. Feelings of shame and fear also deter survivors from seeking care or reporting incidents to justice or security actors. As such understanding of incidence is often impaired and the magnitude of the challenge is likely even more significant. Over half of women (53 percent) who experience sexual violence never seek care nor tell anyone about their experiences of violence, while 42 percent of those who experience physical violence never seek care or tell anyone. It is notable that there is limited understanding of male experiences of physical or sexual violence in Lesotho, however, several studies highlight experiences particularly of sexual assault among adult men and boys. Actual and perceived stigmatization is often even more pronounced for male survivors; thus, the scope and extent of the challenge remains underreported and poorly understood.

The Government has developed critical legislation, legal instruments and policy frameworks that seek to address and mitigate the consequences of GBV. These include:

- the Sexual Offences Act
- the National Gender and Equality Commission (NGEC) Act
- the Prohibition of Female Genital Mutilation Act

3.0 CATEGORIZATION OF GBV/SEA

The WB Guidance Note on GBV/SEA describes GBV/SEA as an ‘umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed gender differences.’ GBV/SEA can occur in a variety of ways, including through the infliction of physical, mental, and sexual harm or suffering threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse and denial of resources, services and

opportunities, trafficking and abduction for exploitation, or IPV perpetrated by a former or current partner.

The WB defines SEA as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. This includes, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment (SH) is understood as unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report on both. Both women and men can experience SH.

The WB Guidance Note defines four key areas of GBV/SEA risks:

- i. *SEA* - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion,
- ii. *Workplace sexual harassment* - unwanted sexual advances; requests for sexual favors, sexual physical contact,
- iii. *Human trafficking* - sexual slavery, coerced transactional sex, illegal transnational people movement; and
- iv. *Non-SEA* - physical assault, psychological or physical abuse, denial of resources, opportunities or services and IPV.

The broader definition of GBV/SEA will be applied to this project. This approach will ensure that a wider set of acts are covered in order to guarantee the protection of project affected persons, especially of the learners, community members and workers.

3.1 Potential Project-related GBV/SEA Risks

There are several GBV-related negative impacts anticipated from this project. There is a risk of GBV against learners in the school environment from fellow students, teachers and workers. There is also potential risk among co-workers contracted by the MoET and among the primary suppliers. GBV could spill over to the communities in the form of sexual favors sought by service providers (e.g., by contractors and primary suppliers) to benefit from the project interventions. Since the project provides for face-to-face training of various cadres of staff, there is also a risk of GBV among learners and between learners and instructors. Specifically, the following forms of abuse are likely to occur:

- i. *SEA* - exploitation of learners/workers and community members by the project workers (direct, contract and primary suppliers) using their differential power. This could lead to rape/defilement of school-going children and rape of women engaged in project activities as workers and service providers, and,
- ii. *Workplace sexual harassment*: this may occur among the workers within the MoET, contract workers and primary suppliers in the form of unwanted sexual advances; requests for sexual favors, sexual physical contact.

3.2 Key GBV/SEA Mitigation Measures

Reporting of GBV/SEA cases committed by contract workers or other workers engaged by the project will be critical especially when school-based learning resumes. The MoET and the implementing partners including primary suppliers, will require contractors/suppliers to report

instances involving credible allegations of GBV/SEA accurately and fully by contract workers, primary suppliers, and/or third parties; and sharing of best practices and lessons learned on addressing GBV/SEA with other stakeholders.

When working with Primary Suppliers, adequate safeguards will be established, and appropriate actions taken on GBV/SEA. This will include screening, cooperative arrangements, monitoring, and termination of arrangements where applicable. The dedicated focal points identified for this project (social safeguards officers, and GRM focal points at the national and district offices) have the overall responsibility for the implementation of prevention of SEA policies and activities and will report regularly to the Project Facilitation Unit (PFU) and the WBG.

GBV/SEA programming guiding principles are outlined below.

- i. **Confidentiality:** at all stages of the intervention, the privacy and confidentiality of survivors will be assured, prioritizing the well-being of survivors, and ensuring that the delivery of services and support will not compromise the privacy or identity of the individuals involved.
- ii. **Respect:** respect of the wishes, dignity and choice of the survivors will be always observed and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks, and consequences of an action, before information is shared or action is taken.
- iii. **Safety and security:** awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by GBV/SEA will be sufficiently addressed and factored into any GBV/SEA intervention or initiative.
- iv. **Non-discrimination:** all GBV/SEA interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by GBV/SEA, without regard to sex, gender, age, ethnicity, religion, or other status.

3.3 Community awareness

Practice within WB funded projects prescribes that beneficiary awareness raising efforts are undertaken on SEA in beneficiary communities. Information will be provided on the MoET's standards of conduct and reporting mechanisms; community-based complaints mechanisms will be set up in project sites and offices as appropriate, including mechanisms for monitoring and reviewing the complaints mechanisms. An incident reporting form is an integral part of the complaints and investigation mechanisms.

3.4 GBV/SEA Referral Pathways

The WB advocates for survivor centered approach to managing all GBV/SEA cases. The security and safety of the survivor should take precedence with any actions taken once the case is reported. The PFU aims to provide avenues for comprehensive GBV/SEA services including GBV/SEA case management, psychosocial support and referral mechanisms for survivors, among others, as illustrated in Table 11-7:

Table 11-7: Template of a Referral Mechanism

TELLING SOMEONE AND SEEKING HELP (REPORTING)	
Survivor/client tells family, friend, community member or service provider; that person accompanies the survivor to the health or psychosocial entry point	Survivor/client self-reports to any service provider

IMMEDIATE RESPONSE The service provider must provide a safe, caring environment and respect the confidentiality and wishes of the survivor/client, learn the immediate needs, and give honest and clear information about the services available. If agreed and requested by survivor/client, obtain informed consent and make referrals, accompany the survivor/client to assist her/him in accessing services			
Medical/health care entry point-GBV/SEA	Psychosocial support entry point - GBV/SEA Adult		Psychosocial support entry point-GBV/SEA Child- under 18
List of health facilities or other entities offering GBV/SEA care and support at the district level.	Agencies (list agencies operating in the district.)		The Children Services and other organizations involved in child protection.
If the survivor/client wants to pursue police/legal action or if there are immediate safety and security risks, for example, if the survivor is a minor (under 16 years), refer and accompany survivor to police/security or to legal assistance for information			
Safety and Security		Legal Assistance Counselors	
AFTER IMMEDIATE RESPONSE, FOLLOW-UP AND OTHER SERVICES Over time and based on survivor's/Client's choices can include any of the following:			
Healthcare	Psychosocial services/Case management	Protection, security, and justice actors	Basic needs - children's services, safe shelter
Refer to facilities identified as able to handle GBV/SEA cases (each District has facilities that manage GBV/SEA)	This could be accessed at health facilities or through partners (CSOs, CBOs or FBOs)	Agency Name: The Mounted Police, Ministry of Labor and Social Protection, National Gender Commission. SERVICES: * Arrest perpetrator – Police, * Gather evidence and complete file for case, * Inform survivor and witnesses on court hearing, * Provide physical protection/safe shelter. SERVICES: * Provide legal counselling, * Transport, accommodation and meals for survivor/witness and family to attend court.	Agencies: Children Services (among other providers depending on the district) SERVICES: *Livelihood program, life skills/vocational training/ entrepreneurship.

4.0 ACCESS TO JUSTICE

The provision for a project based GRM does not in any way limit the aggrieved party from seeking recourse from the courts of law in the country. Information will be provided to the project beneficiaries on the legal system that they could use as needed including the sources outlined below.

- v. The Judiciary system has in the past invested in strengthening the National Police Force to establish gender desks in most police stations across the country. Specific police officers have also been trained to manage survivors and ensure that all necessary information and evidence is gathered to facilitate prosecution of offenders/perpetrators, as necessary.
- vi. The National Gender Commission, which has a GBV/SEA mandate, has offices across the country which can be used to facilitate access to justice for survivors and their families.

- vii. There are many organizations (both local and international) operating across the country (although not evenly distributed) which render support to survivors in the pursuit of justice.

5.0 PREVENTION OF SEXUAL EXPLOITATION AND ABUSE

This Plan aims to facilitate a consistent approach across all potential GBV/SEA complaints received from every possible channel established to manage GRM on the project (email, call center/hotline, phone calls, in-person reports, etc.). The WB has SEA misconduct response systems, which will apply and ensure that all parties engaged in the project respond to the misconduct of project staff or any worker of contractors and primary suppliers. These responses will follow the different organizational set-ups, but will all comply with the relevant WB protocols on SEA.

All IPs, contractors and suppliers for this project are obligated to create and maintain an environment that prevents GBV/SEA. They are also required to develop systems that maintain this environment, including but not limited to the following.

- i. *Adoption of the Core Principles of the WB on PSEA⁴¹*. All categories of workers will be inducted and required to sign a code of conduct (CoCs), which includes expected standards of behavior regarding GBV/SEA. The IPs, contractors and primary suppliers will further ensure that all workers have been inducted and have signed a CoC.
- ii. *Prevention of Child Labor*: The project shall not engage anyone aged below 18 years of age (as per ILO guidelines to prevent Child Labor).
- iii. *Media*: The MoE will ensure that images of children are not used without the consent of both the parent/guardian/caregiver and the child (assent based on the age), and any pictures should have children fully dressed and none should depict them as victims including in captions.

5.1 Mitigation of SEA

Several mitigation measures will be implemented by the project to ensure the protection of all learners supported by the project.

- i. *Community awareness and disclosure of CoC*: The CoC will be made available to the public in the project areas, especially to identified project stakeholders. Education and raising of awareness for communities and learners on SEA and their legal rights will be done. Project beneficiaries will be made aware of the laws and services that can protect them and provide redress in case of an incident.
- ii. *Community awareness on child protection concerns*: Communities will be informed that in case project and partner staff abuse children, they should refer such complaints to child protection partners and any other agencies engaged in GBV/SEA prevention without recording the survivor's details.
- iii. *Gender and child sensitive communication channels*: Disclosure will take place through different communication channels taking into consideration child and survivor safety when designing and distributing information by the PFU and/or the respective IP. For instance, information on cards, pamphlets and/or posters will be distributed in places like bathrooms, where the learners can look at them without being observed by other people. Also, construction sites and waste management sites, which attract children playing in the community, will be used to disseminate PSEA information.
- iv. *Training of Workers and Partners*: the MoE and all IPs will ensure their direct workers, partners, suppliers and others are trained in CoC, GBV/SEA and child protection risk issues as part of their induction (and refreshers will be offered regularly). They will roll out direct training activities for all contracted, as well as community workers deployed for their activities – prior to the start of such. The IPs will ensure that records of all inductions are kept and shared with the PFU. The PFU and WB Team will further review training materials and make suggestions for revision if there are gaps.
- v. *Cases of GBV/SEA can be reported through the general Project GRM*: the GRM focal points for the project will be trained to receive GBV/SEA cases in an appropriate manner.

Beneficiaries and communities will generally be encouraged to report all GBV/SEA cases through the dedicated GBV/SEA referral system and complaints resolution mechanism. Contact information will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. All information will be made accessible to learners and all project beneficiaries. The GBV/SEA referral system will ensure that survivors receive all necessary services, including medical, legal, counseling, and that cases involving children aged 16 years and below are reported to the police where applicable.

Cases of GBV will require immediate attention. If such cases are reported through the Project GRM, the GRM focal point will report the case immediately to the PFU, as the PFU is obligated to report any cases of GBV/SEA to the WB within 24 hours. Furthermore, cases need to be reported to the respective IPs, if they concern direct workers or workers from a contractor, NGO partner or even community workers.

5.2 Response to GBV/SEA

The Project team has established a separate GBV/SEA response mechanism that will be used in line with the WB Guidance. Responses will include the implementation of sanctions for violations of worker CoC.

- i. All partners and contractors will be required to develop organizational whistleblowing policies that encourage workers to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting. The definition, scope, and protection measures may differ between organizations. General principles apply to whistle-blowers, as they would to any complainant, and internal agency policies will protect whistle-blowers on GBV/SEA from retaliation, so long as the report is made in good faith and in compliance with internal agency policies (this obligation is also contained in the CoC which is signed with all workers engaged on project activities).
- ii. All IPs will commit to timely and expeditious action to provide assistance to survivors and to comply with all timelines for action laid out in this Action Plan.

6.0 INVESTMENTS IN GBV/SEA SERVICE PROVISION AND REFERRAL PATHWAYS

This GBV/SEA Action Plan provides general guidance and recommendations for improving existing mechanisms, specifically in rural areas and the historically marginalized communities. Where services are not available, training will be provided to frontline health providers on basic response (e.g., psychosocial first aid and basic care). This will be done in consultation with other agencies engaged in project activities including UNICEF, as appropriate.

- i. *Safety audit and GBV/SEA assessments* to understand specific GBV/SEA risks in project sites that relate to learners in schools as well as changes in community gender dynamics.
- ii. *GBV/SEA risk assessments:* This assessment will serve to understand possible negative impacts in gender dynamics in schools and communities in implement appropriate mitigation measures. Examples of activities include the engagement of key stakeholders in the community, psychosocial support to learners and parents/guardians, etc.
- iii. *Mapping and delineation of GBV/SEA referral services in project areas:* In order to complete existing information on referral pathways in project areas, a community and stakeholder consultation on GBV/SEA referral pathways assessment will provide information on the functioning and effectiveness of referral pathways in place. Consultation will take place during the Project Inception Phase and will serve to update this GBV/SEA Action Plan.
- iv. *Provision of a package of GBV/SEA services* (medical, legal, mental health, psychosocial and materials support) in project areas as per results of the GBV/SEA mapping of services. GBV/SEA services will be provided through either mobile health outreach teams and/or community/district health centers depending on the project area needs.

- v. *Training on GBV/SEA and Survivor Centered Response for community and district health professionals.* The training of key community structures will include GBV/SEA guiding principles and referral pathways. Also, training on WHO guidelines for Clinical Management of Rape (CRM) and psychosocial support.
- vi. *Provision of hygiene/dignity kits* for vulnerable girls including GBV/SEA survivors and pregnant girls.
- vii. *Provision of relevant GBV materials*, including fliers on referral pathways to be used in case of violation, school reentry guidelines, and legal redress mechanisms.
- viii. *Strengthen coordination and collaboration:* This will be done at national and district levels by involving the government's relevant units in strengthening of the GBV/SEA package of services and referral systems in project areas.

7.0 PARTNERSHIP AND COLLABORATION

The project will seek partnership with several partners at the national and district levels. These will include the MoH, Department of Gender, Children's department, Police Service, Judiciary, Probation and Office of the DPP to ensure that perpetrators are arrested, tried in court and sentenced accordingly. The Department of Children's Services has the capacity to rescue abused children and secure them while court proceedings are ongoing to prevent perpetrators from interfering with the judicial process. Further, faith-based organizations, NGOs and various charity organizations also offer support services and rescue efforts countrywide.

8.0 GBV/SEA CAPACITY BUILDING, MONITORING AND EVALUATION.

The project will put in place monitoring tools to ensure adherence to the provisions made in this plan.

8.1 Response to GBV/SEA

The PFU, as well as IPs, will use the existing GBV/SEA referral pathways as well as expand the availability of the basic package of multi-sectoral GBV/SEA services at the district level. Also, the project will build capacity of service providers to deliver quality GBV/SEA services in line with best practices, with a focus in counties that might not have GBV service providers. The project will ensure that affected women, men, boys and girls receive psychosocial support and safe referral services.

8.2 Monitoring and Supervision

The Project safeguards team will monitor all GBV/SEA reported cases through the various reporting mechanisms and report back to the PFU. The monitoring will adopt a mixed-methods approach, including the utilization of perception surveys and community-based monitoring to enable an in-depth understanding of the impact of project activities on community members. This is a particularly pertinent approach given the sensitivities of the interventions that center on children.

Continuous monitoring: new complaints and ongoing cases and complaints will be followed closely by the GBV/SEA focal points at the district and national levels.

Monthly review of services: the PFU will conduct monthly review of services to ensure the continuous availability of services, continued access to services by survivors, dissemination of correct information to survivors during case management and to women, girls and the community at large during awareness on available services.

Quarterly monitoring: The PFU will monitor the implementation of this Action Plan on a quarterly basis. Quarterly reviews will focus on:

- i. Ensuring that all activities (as listed above) have been undertaken and/or are on track,
- ii. Reviewing all referrals made in specific cases, and assessing whether complaints have been handled and/or resolved appropriately,

- iii. Monitoring and reporting on the effectiveness of the implementation of the GBV/SEA Action Plan, and
- iv. Reporting on progress on all activities and re-assessment of risks and monitoring of the situation as appropriate.

Non-compliance: where quarterly reviews identify non-compliance with the GBV/SEA Action Plan, the matter will be reported to the Project Manager in case of IPs' non-compliance and to the WB in case of PFU non-compliance. The PFU and WB will then seek clarification from the respective IP or PFU and jointly develop plans on how to assist to bring activities back on track. Serious cases can lead to the termination of contract with the IP.

Monitoring and evaluation of PSEA activities will include the following measures:

- i. The PFU will ensure that all project workers sign the CoC developed for this project. Spot checks will be done at funded facilities to monitor adherence to this provision,
- ii. All staff will be trained on PSEA, CoC and the relevant protocols. All GBV/SEA related complaints will be received and handled in a manner that safeguards the well-being of the survivor,
- iii. It is expected that all IPs, contractors, and sub-contractors will disclose their CoC, and that IPs will report all related activities to the PFU for monitoring purposes,
- iv. PFU will monitor that IPs have a GBV/SEA free environment and implement safety audit recommendations regarding lighting, signing of CoC, information on GRM and referral pathways, and
- v. PFU will monitor the project implementers bimonthly on their implementation of the GBV/SEA action plan via reports, community-based monitoring, and field visits.

On GBV/SEA programming, the PFU will monitor that:

- i. Communities, including children, are aware of the risks of GBV/SEA, their rights, and the mechanisms available to them to report GBV/SEA cases,
- ii. Appropriate GBV/SEA services and referral pathways are provided to survivors,
- iii. Referral pathways are in place and functional,
- iv. Percentage of first responders who are trained/oriented on the referral pathway,
- v. Standard intake and referral forms are developed and utilized by service providers; and
- vi. Percentage of GBV/SEA survivors who were referred for comprehensive care, within a given period.