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THE GOVERNMENT OF THE KINGDOM OF LESOTHO
MINISTRY OF EDUCATION AND TRAINING (MoET)

LESOTHO EDUCATION IMPROVEMENT PROJECT (LEIP) (P500587)

FINAL ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)



8TH MAY 2025

OTHER REPORTS IN THIS SERIES

The Lesotho Education Improvement (LEIP) 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 adopted 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 of both Basic Education and Strengthening Project and Lesotho Educational Quality for Equality.

The following documents form the series:

1. Volume 1: The ESMF
LESOTHO EDUCATION IMPROVEMENT PROJECT (LEIP)
ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK
2. Volume 2: The SEP
LESOTHO EDUCATION IMPROVEMENT PROJECT (LEIP)
STAKEHOLDER ENGAGEMENT PLAN (SEP)
3. Volume 3: The ESCP
LESOTHO EDUCATION IMPROVEMENT PROJECT (LEIP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

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The Minister of Education and Training
Attention: The Secretary of Education and Training
Ministry of Education and Training
Maseru
Lesotho.

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LIST OF ABBREVIATIONS

AIDS	Acquired Immunodeficiency Syndrome
ACRWC	African Charter on the Rights and Welfare of the Child.
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
LEIP	Lesotho Education Improvement Project
LEQEP	Lesotho Education Quality Enhancement Project
LMIC	Lower Middle-Income Country
LMP	Labour Management Procedure
ILO	International Labour Organisation
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 Ministry of Education and Training (MoET) of the Government of the Kingdom of Lesotho has set the attainment of quality universal education as a major objective in its current Education Strategic Plan. The MoET is currently intending to implement the project by the name of Lesotho Education Improvement Project (LEIP) **P500587 for over** five years with support from the World Bank to assist in meeting this objective. The MoET recognised that the project and sub-components have the potential to generate both positive and negative impacts. The World Bank prerequisite is that all World Bank funded projects have to be screened for potential environmental and social impacts, hence the need for the ministry to develop Environment and Social Management Framework.

LEIP's proposed Project Development Objective (PDO) is to improve the quality of teaching and learning in junior secondary and primary schools and enhance physical learning environments and conditions in targeted primary and secondary schools.

The Project Overview and Descriptions

Proposed Project Components and Sub-Components	
Component 1: Improving quality of teaching and learning in primary education (US\$ 3.3 million)	Subcomponent 1.1. Scaling up online training models in maths and science for junior secondary school teachers (US\$1.5 million).
	Subcomponent 1.2. Strengthening Foundational Learning (FLN) in Literacy and Numeracy in Primary Schools in Grades 1-3 (US\$1.5 million)
	Subcomponent 1.3. Development and implementation of National Learning Assessment in Grade 9 (US\$ 0.3 million).
Component 2: Enhance physical learning environment and conditions in primary and secondary schools (US\$ 1.5 million)	Subcomponent 2.1. Improving infrastructure in targeted primary schools (US\$10 million).
	Subcomponent 2.2. Construction of laboratories in targeted secondary schools (US\$5 million).
Component 3: Strengthen project management, technical assistance, and governance of education system (USD 1.7 million)	Subcomponent 3.1. Decentralization of Teachers Service (USD 0.5 million).
	Subcomponent 3.2. Project monitoring, evaluation, management, environment and social safeguards, procurement, financial management, and audit (US\$ 1.2 million)

Rationale for the LEIP ESMF¹

This is a nationwide programme that constitutes several components or activities, which are anticipated to generate varying effects on different components of the environment and the society at large. The project main the activities as shown in the above include: i) Improving quality of teaching and learning in primary education

¹ Refer to Appendix 2.

(US\$ 3.3 million), ii) Enhance physical learning environment and conditions in primary and secondary schools (US\$ 15 million) and iii) Strengthen project management, technical assistance, and governance of education system (USD 1.7 million)). 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.

The purpose of ESMF is to present a framework for screening, monitoring and mitigating potential impacts that will trigger subsequent sub-project environment and social assessments when a project consists of a programme and/or series of subprojects and the affected persons, risks and impacts that 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 had not been established when ESMF was developed.

Therefore, this ESMF has been prepared as a guide for the initial screening of the proposed activities for any negative environmental and social impacts, which would require attention before project implementation. This ESMF is to be used by the LEIP to ensure that all environmental and social safeguards are adequately addressed and relevant capacity building and training needs are established with recommended measures for implementation. Furthermore, 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 an 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 behind the consultations is to take on board views from a cross-section of people, at the local level, district level, and central government level. Overall, the ESMF will ensure that the substantive concerns of the relevant World Bank Standards and the Lesotho legislation will be considered during the implementation of the LEIP activities.

Policy, Legal and Institutional Framework

The policy and legal review established that the LEIP will be supported by a host of laws, regulations and institutions that promote 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 emphasises prudent management of the environment and accords future generation's 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 LEIP will be 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), which are used to examine potential environmental and social risks and benefits associated with Bank lending operations. It has been developed in accordance with the requirements of ESS1 and the other relevant World Bank Environmental and Social Standards (ESSs) that include ESS2, ESS3, ESS4, ESS6 and ESS10.

Programme Categorization

The assessment undertaken through desk review reveals that the project's overall risk rating is Moderate in both physical environment and the social environment. This risk will be mitigated by the consistent presence of technical staff within the PFU, who support implementation of the World Bank and GPE financed projects, as has been the case under LBEIP, LEQEP and BESP.

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 also moderate, mainly because component 2 of the project will support construction activities that are expected to have generally negative environmental impacts.

Environmental and Social Assessment Process

To ensure that potential environmental and social impacts are identified and ultimately adequately addressed, a stakeholder consultation process will be 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) 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 measures

The potential associated impacts were analysed, and mitigation measures for the identified impacts were 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, noise pollution, and, of course, soil degradation. The potential waste will need to be managed carefully to prevent public health risks and environmental impacts. This will be done in line with the requirements of the Environment Act, 2008 and the E-Waste Management Plan.

The major Social Impacts will include i) poor stakeholder consultation due to involvement of district and local stakeholders in all phases of the project developments, 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. Inconvenience during the construction phase for students within the school compound, generation of dust and over use of existing sanitation and water services. Although labour influx is not anticipated due to the fact that the project will adopt the Community Based Labour Approach, the ESMF will include measures to avoid, minimize, manage, and mitigate any Gender Based Violence (GBV) / Theft, Sexual Exploitation and Abuse (SEA) risks. These risks will be monitored throughout the project cycle to ensure that proper management including awareness campaigns, is implemented, and solid waste containers are used to avoid littering.

There will also be generation of e-waste, hazardous waste, and solid wastes, emanating from the laptops and solar panels that will be provided to schools, noise pollution, and of course, soil degradation. 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.

ESMF Implementation Arrangements

The MoET is in the process of engaging an Environmental and Social Specialist (ESS) to complement 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, including headed by the MoET and consisting of:

- MoET – District Education Officers
- MoTEC – District Environment Officers
- MOLGC - District Administrators Offices

The District Education offices have selected sub-projects for participating Schools with the assistance of the District Technical Teams. 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 have assisted participating schools in preparing their sub-projects applications to avoid or minimize adverse environmental and social impacts. The Technical Teams have assisted in the screening of the sub-projects and will use the checklist to manage adverse impacts.

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 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 Environmental and Social Safeguards Specialist will ensure that all stakeholders involved in the project implementation are capacitated in the areas of environment and social management framework so as to ensure 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.

Monitoring

The client will need to engage the Environmental and Social Compliance Officer during the construction phase to monitor compliance with proposed mitigation measures and bring to the fore, should there be new impacts that might arise during implementation phase for each sub-project components.

Monitoring activities shall keep track of the requirements, responsibilities and costs for implementing the identified environmental and social mitigation measures, as per the monitoring plan that has been prepared for the project. Individual sub-projects can prepare site-specific monitoring plans in line with the checklist in Appendix 10. The supervision of the implementation of the monitoring plan will be done using the safeguards checklist for general supervision, reflected in Appendix 7.

Conclusions and Recommendations

The LEIP depicts more positive than negative potential environmental and social impacts. These envisaged negative environmental and social impacts will be localised, minimal, short-term term and can be mitigated. The final benefits of this project to the nation will, by far, outweigh any potential negative effects. Furthermore, the project will overall not have any significant environmental and social impacts if the recommended mitigations are implemented.

The improvement in quality education that the community will benefit, will translate to improved livelihoods as people will have relevant life skills that can contribute to the socio-economic improvement of the country and eventual improved livelihoods.

1. PROJECT BACKGROUND

The Ministry of Education and Training (MoET) of the Government of the Kingdom of Lesotho has set the attainment of quality universal education as a major objective in its current Education Strategic Plan. The MoET is currently intending to implement the project named Lesotho Education Improvement Project - LEIP (**P500587**) over the period of five years with support from the World Bank.

The main objective of this project is to improve the quality of teaching and learning through primary and secondary schools to enhance physical learning environments and conditions in targeted primary and secondary schools. The project interventions have included tailored package of investments/activities aimed at i) Improving quality of teaching and learning in primary education (US\$ 3.3 million), ii) Enhance physical learning environment and conditions in primary and secondary schools (US\$ 1.5 million); and iii) Strengthen project management, technical assistance, and governance of education system (USD 1.7 million).

The development of this ESMF provides a general impact identification framework to assist project implementers in screening projects and instituting measures to address adverse environmental and social impacts. This ESMF thus applies to all sub-projects and other activities funded by the World Bank. Specific information is provided on the project locations and land to be impacted. Although this project will be implemented on land already acquired by schools, it is essential to assess the bio-physical features, health and safety issues, etc., which can be updated regularly to reflect any new issues identified through monitoring activities. Notwithstanding, in special cases, a subproject-specific Environmental and Social Impact Assessment (ESIA) can be developed.

The development of this ESMF has been informed and aligned with all World Bank Environment and Social Standards as well as the Government of Lesotho laws and policies on environment. This ESMF has been prepared by MoET, in consultation with World Bank and shall inform preparation of the Environmental and Social Management Plan (ESMP) for LEIP.

The objective of the ESMF is to assess and mitigate potential negative environmental and social risks of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF has (a) assessed the potential environmental and social risks and impacts of the Project and propose mitigation measures; (b) established procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specified appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identified staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the

ESMF; (e) addressed mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) established the budget requirements for implementation of the ESMF.

This ESMF provides a guide for the integration of environmental and social considerations into the planning and implementation of the LEIP. 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 improvement activities and serves as a framework for screening environmental and social issues for all possible education listed 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 clear, comprehensive, and practical guidance to the MoET Project Facilitation Unit and other project implementation entities, on integrating environmental and social considerations into the project.

Therefore, the main purposes of the ESMF were 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 LEIP,
- 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. 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,
- iv. Specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to project investments,
- v. Establish the budgetary requirements for the implementation of the main project ESMP,
- vi. Develop and implement a public consultation and stakeholder engagement strategy, and
- vii. Define appropriate environmental and social standards performance indicators.

The LEIP was prepared under the World Bank's new Environment and Social Framework (ESF), which came into effect on October 1, 2018, replacing the Bank's Environmental and Social Safeguard Policies. Under the ESF, all World Bank Borrowers have agreed to comply with ten Environmental and Social Standards (ESSs) applied to investment project lending financed by the Bank. The Project recognises the

significance of and adopts the ESSs² to identify and manage the environmental and social risks and impacts associated with this investment project.

The reviews undertaken by the Bank have classified LEIP environmental and social risks as moderate³. As a response, the World Bank has developed several key instruments to address the environmental and social risks emanating as a result of the project activities. They include ESS2 that relates to Labour and Working Conditions and expects the Borrowers to develop Labour-Management Procedures (LMP) and ESS 10 which defines a strategy for Stakeholder Engagement, including public information disclosure and consultations, throughout the preparation and implementation of the proposed project and other relevant policies to assist in the implementation of ESMF. In a nutshell, the ESSs to be applicable in the project include ESS1, ESS2, ESS3, ESS4, ESS6 and ESS10.

The World Bank has classified the environmental and social risks for LEIP as moderate. As such, the following ESSs have been identified as triggered by the project:

ESS1: Assessment and Management of Environmental and Social Risks and Impacts to be done in a table format

ESS1 is triggered by the LEIP project due to its infrastructure-related activities. These activities can lead to a range of environmental and social risks, including land-use change, potential impacts on local ecosystems, waste generation (including electronic waste), occupational health and safety issues, and temporary disturbances to surrounding communities. To address these risks, an Environmental and Social Management Framework (ESMF) has been developed to guide the identification, assessment, and mitigation of potential impacts throughout the project lifecycle.

ESS2: Labour and Working Conditions

The LEIP project will involve a variety of workers, including direct workers, contracted workers and possibly community workers engaged in minor site-based tasks. These labour arrangements necessitate adherence to ESS2 to ensure the protection of workers' rights, prevention of child or forced labour, and compliance with occupational health and safety standards.

ESS3: Resource Efficiency and Pollution Prevention and Management

The project involves infrastructure development and rehabilitation of schools, which will require the use of construction materials, water, and energy. Additionally, the project will distribute electronic devices such as laptops and solar panels, which may lead to electronic waste (E-waste), battery waste, and other solid waste. To minimise

². Please refer to Appendix 5

³ In line with the significance rating table in Appendix 11.

the environmental footprint, the project must adopt energy-efficient technologies, promote waste reduction and recycling practices, and ensure proper disposal of hazardous materials.

ESS4: Community Health and Safety

The LEIP project will involve construction and renovation work in schools, which might bring risks to nearby communities. These could include noise, dust, increased traffic, accidents, or the spread of diseases. As a result, the project must put in place measures to protect the safety and well-being of local people, such as controlling traffic, reducing dust and noise, managing waste safely, and setting up emergency procedures if something goes wrong.

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is about protecting plants, animals, and natural habitats. It ensures that project activities do not harm the environment or cause loss of biodiversity. This standard is triggered to make sure the project avoids harming important species or ecosystems, especially in rural or sensitive areas.

2. PROJECT DESCRIPTION

The Project will be implemented in all the ten districts of Lesotho in selected primary and secondary schools within different ecological zones. It comprises of various sub-projects with different levels of environmental and social impacts.

2.1 THE PROPOSED PROJECT COMPONENTS AND SUB-COMPONENTS

Component A: Improving quality of teaching and learning in primary education (US\$ 3.3 million)

Sub-component i). Scaling up online training models in maths and science for junior secondary school teachers (US\$1.5 million). The proposed LEIP will build on the experiences from the previous project BESP and scale up the online teacher training initiative to cover more maths and science teachers in government secondary schools. The University of Free State (UFS) in South Africa, which had been contracted to deliver the online courses for maths and science under that Basic Education Strengthening Project (BESP), would hand over the online course delivery to the National University of Lesotho (NUL) and Lesotho College of Education (LCE) by December 2024. UFS would conduct the appropriate orientation of NUL LCE, and MoET staff, and ensure a smooth transition. As was done under the BESP, the LEIP would provide laptops to the teachers to be trained and will consider providing solar panels to selected secondary schools as well as mobile WiFi/internet connectivity.

Sub-component ii). Strengthening Foundational Learning (FLN) in Literacy and Numeracy in Primary Schools in Grades 1-3 (US\$1.5 million). This will include support for primary schools as well as multi-grade schools and strengthening District Resource Teachers' (DRT's) capacity to provide school-based professional support in foundational learning, and the use of ICT. The activities will include (i) development of FLN curriculum for grades 1-3 including for multi-grades; (ii) procurement of tablets and solar chargers for schools; Printing of curriculum materials for 300 multi-grade schools; (iii) training on Foundational Literacy and Numeracy; and (iv) monitoring and mentoring support visits to schools. The expected outcomes would be (i) reviewed, digitalized curriculum for grades 1-3 (foundational phase) (Grade R completed and digitalized); (ii) digitalized curriculum package for multi-grade teaching (syllabus, teachers' guide, teaching plans); and (iii) Refined teaching and learning materials (teachers' and learner' toolkits).

Sub-component iii). Development and implementation of National Learning Assessment in Grade 9 (US\$ 0.3 million). This subcomponent would provide technical assistance to develop and conduct National Learning Assessments in Grade 9 on maths, science, English and Sesotho aligned with the current curriculum in junior secondary. The assessment will be conducted twice during the project life. This will be

the first time Lesotho has undertaken such learning assessments for junior secondary since 2017.

Component B. Enhance physical learning environment and conditions in primary and secondary schools (US\$ 15 million)

Sub-component i). Improving infrastructure in targeted primary schools (US\$10 million). To ensure adequate infrastructure to accommodate growing student populations. This subcomponent would (i) construct additional classrooms in existing primary schools; and (ii) provide furniture and toilets for girls, boys and staff to existing primary schools.

The Department of Primary Education of MoET has already selected schools where the project is going to be implemented. On February 16, 2024, the CEO of Primary submitted a draft list with school name, district, enrolment data, and other facilities. The Planning Department added locations with GPS coordinates to the schools. The unit cost per classroom, toilet blocks and total cost for Subcomponent 2.1 were also estimated based on the information from the recently closed LEQEP and other sources.

Sub-component ii). Construction of laboratories in targeted secondary schools (US\$5 million). To ensure secondary schools have equipped laboratories for science, this sub-component shall (i) construct computer labs, biology-chemistry labs, physical science labs, and integrated science labs in the existing secondary schools; and (ii) provide lab furniture, toilets, electricity (where needed), and waste disposal facilities.

The Department of Secondary of MoET has selected secondary schools. On February 17, 2024, The CEO of Secondary submitted a draft list with school name, district, enrolment data, and other facilities, and the Planning Department added locations with GPS coordinates. The unit cost per laboratory, toilets, waste disposal and total cost for this subcomponent were estimated.

Component C: Strengthen project management, technical assistance, and governance of education system (USD 1.7 million)

Sub-component i). Decentralization of Teachers Service (USD 0.5 million). The objective is to reduce bureaucratic hurdles and administrative red tape, leading to a more responsive, streamlined, and efficient delivery of education services. This component entails the strengthening the e-governance teacher filling system (electronic and paper filing system as a back-up) and establishment of workstations for district level personnel, including installation of internet and servers, procurement of stationery, office furniture, and non-office equipment. The project is expected to directly support the Teaching Services Administration and enhance service delivery for over 15,000 teachers in all public schools from primary to secondary in all districts.

Sub-component ii). Project monitoring, evaluation, management, environment and social safeguards, procurement, financial management, and audit (US\$ 1.2 million).

The proposed project implementation period is five years. This subcomponent aims at strengthening MoET's institutional capacities to implement the LEIP especially as it concerns its planning, budgeting, monitoring, and reporting and compliance with the fiduciary aspects of financial management, procurement and environmental and social risk management safeguarding attuned to the Financing Agreement and the Project Operation Manual (POM) and project annual audit.

Components A and B are comprised of activities which have a bearing on physical and social environments, hence all steps of the project cycle, hence the need to prepare an Environmental and Social Management Framework (ESMF). Thus, 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 was 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).

This Environmental and Social Management Framework (ESMF) is to be used in LEIP 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.

3. METHODOLOGY

In finalising the development of the ESMF, activities outlined hereunder were undertaken:

3.1 DESK REVIEW

Pertinent literature has been reviewed in preparation of both draft final ESMF. This consisted of reviewing relevant documentation (both print and electronic). They include the MoET/World Bank LEIP project concept, national legal and policy documents on environment and social impact assessment, and the World Bank operations policies including Environment and Social Framework, Environment and Social Standards ESSs and related annexes. Finalisation of the document involved further perusal of certain documents in order to update the draft ESMF.

3.2 SITE VISITS

There will be site visits undertaken to identify flora and fauna as well as socio-economic, health and safety issues that will be affected by the development and formed the basis for drafting the ESMF. The impacts identified Issues to be covered include but not limited to identification of:

- Pollution (water, soil, air, noise)
- Waste handling and storage
- Effect on soil (erosion, compaction, quality)
- Introduction of alien weed/pest species
- Land use conflicts
- Site landscaping, restoration and rehabilitation
- Visual/ aesthetic value
- Effect on local communities' way of life
- Compensation issues
- Dealing with possible resistance to development
- Management of illegal access and squatting
- Increased risks to public health (accidents, STDs, deteriorated water supply, etc.)
- Project's social impacts on health and social well-being
- A detail of the impacted communities: location, access, land use, services (types, capacity, and adequacy) and housing, including for work workforce, service new development, and absorb and adjust to growth (worker/family)

Identify risks pertaining to labour influx and potential Gender Based Violence (GBV) issues associated with construction workers and prepare a GBV/SEA Action Plan.

3.3 STAKEHOLDERS CONSULTATIONS:

This consist of consultation with the project affected parties that included the Ministry of Education and Training, Ministry of Environment and Tourism, Project Facility Unit, Education Facility Unit and World Bank both Washington DC and Maseru, local communities, schools' management and boards in line with Appendix 13.

4. THE POLICY, LEGISLATION AND REGULATORY FRAMEWORK

In this section, pertinent laws, regulations and policies were interrogated to inform the development of the ESMF for the project. This process commences with the review of the national legal and policy frameworks. It then proceeds to internal instruments including those of the World Bank because it supports the project and therefore compliance with their instruments and standards is of paramount importance.

As by way of introducing this section, it is important to make reference to the Constitution of Lesotho, which is the supreme law governing the Kingdom of Lesotho, which was adopted in 1993 and has been reviewed a few times. One of the underpinning principles of the Constitution is to promote sustainable socio-economic development through mainstreaming of environmental and social considerations in the project planning and implementation.

The Constitution articulates education as one of the fundamental rights in Chapter III. It states that Lesotho shall adopt policies aiming at ensuring that education is accessible to all. By implication, the legal framework has set a good tone for the delivery of quality education to all.

The tables below highlight laws and policies that are applicable to LEIP and education sector in general.

Table 1A: The Constitution of Lesotho

No.	CONSTITUTION	INTERPRETATION	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 LEIP do not adversely compromise the protection of the environment for the benefit of both the present and the future generations.

Table 28: National Environment Laws and Policies

NO.	POLICIES AND LAWS	INTERPRETATION	RELEVANCE TO THE PROJECT
1.	National Environment Policy, 1998	The overall goal of the National Environmental Policy is to achieve sustainable livelihoods and development of Lesotho. It focuses on the social and economic dimensions, the management and conservation of natural resources, and promotion of community participation. The main objectives of the policy include securing for all Basotho well managed environment with a view to enhance health and well-being of the nation through sustainable use and well conserved 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 through this policy.
2.	Environmental Act of 2008	The Environment Act sets several environmental standards in relation to construction, including pollution - 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 provide for the EIA categories or level of EAs that will be required for particular projects.	The overall categorization of LEIP 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.
3.	Environmental Impact Assessment Regulations, 2021	This document provides detailed procedures for conducting Environmental Impact Assessments (EIAS), including requirements for public participation, environmental	Guides the preparation, approval, licensing, and compliance monitoring of the project's ESIA and ESMP processes in line with national standards.

No.	POLICIES AND LAWS	INTERPRETATION	RELEVANCE TO THE PROJECT
		practitioners, monitoring, and auditing.	
4.	Guidelines for Environment Impact Assessment in Lesotho (2009)	The guidelines facilitate compliance with Lesotho's EIA process requirements by providing a step-by-step guide on how to carry out an EIA process. Therefore, the guidelines aim to integrate environmental concerns and economic development from the earliest stages of project development (Gol, 2010).	The guidelines help to integrate environmental considerations into development planning, thereby promoting sustainable livelihoods and ensuring 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.
5.	Public Health Order No. 12 of 1970	Provides for public health protection, including sanitation, waste disposal, food safety, communicable disease control, and regulation of activities affecting human health.	Requires the project to implement public health safeguards, which include adequate sanitation facilities, waste management systems, and disease prevention measures during both the construction and operational phases.

Table 3C: National Education Laws and Policies

No.	LAWS AND POLICIES	INTERPRETATION	RELEVANCE TO THE PROJECT
1.	The Education Act 2010	The Education Act pursues the principle of 'Education For All', by ensuring that every child is provided with opportunities and facilities to enable them to develop physically, mentally, morally, spiritually socially in a healthy, normal manner, in conditions of freedom and dignity accommodating all state of impairment.	While LEIP 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 avoided or minimised.
2.	Sustainable Development Goal 4	Lesotho, as a member state of the United Nations, has committed to the Sustainable Development Goals (SDGs), including SDG 4, which aims to "ensure inclusive and equitable quality education and promote lifelong learning opportunities to all."	Lesotho has made significant progress in adopting SDG 4 by implementing free primary education and improving gender parity in schools. The country has integrated SDG 4 into its National Strategic Development Plan II and continues to invest in school infrastructure through LEIP and teachers' training.

Table 4D: Other Relevant Laws and Policies

No.	LAWS AND POLICIES	INTERPRETATION	RELEVANCE TO THE PROJECT
1.	Local Government Act No. 6 of 1997	The Act provides for the establishment of local authorities and 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. As part of the management plan for waste disposal, it is crucial to consult with these local authorities for allocation of safe places for disposal of rubbles and other contaminants.
3.	Labour Act, 2024	The Act consolidates all labour and employment laws into a single framework, strengthening worker protections, promoting fair labour practices and extending coverage to the public sector. It aligns with international labour standards and repeals the <i>Labour Code Order, 1992</i> . Key provisions regulate working hours, overtime, and rest periods while ensuring maternity leave of six weeks with pay in specific industries. The Act includes protection for women and children in the workplace, likely addressing issues such as child labour and workplace discrimination. Employers must implement Occupational Health and Safety (OHS) measures, and employee benefits such as adoption and bereavement leave are also covered.	<p>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.</p> <p>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.</p>
4.	Occupational Safety and Health Act, 2024	An occupational safety and health Act ensures a safe working environment and continuously improves workplace safety. This includes promoting a national preventative safety culture, progressively enhancing worker protection, and safeguarding individuals beyond the workplace. Additionally, effective	The Occupational Health and Safety Act of Lesotho, 2024, ensures the health and safety of all workers involved in the construction process. This includes enforcing safety protocols for handling construction materials, operating machinery, and managing potential hazards at the construction sites.

No.	LAWS AND POLICIES	INTERPRETATION	RELEVANCE TO THE PROJECT
		compliance and enforcement measures must be implemented while aligning with international conventions to meet global safety standards.	The Act mandates risk assessments to identify and mitigate any dangers, such as exposure to dust, chemicals, or physical accidents. Additionally, it emphasizes the provision of protective gear, ensuring proper training for workers, and maintaining a safe working environment. Compliance with the Act will help prevent accidents and health risks during the upgrading of educational facilities, protecting both workers and school occupants.
5.	Lesotho Land Act (2010)	The Land Act 2010 of Lesotho is relevant to the Lesotho Education Improvement Project as it governs land ownership, use, and development. Section 4(1) establishes that all land is vested in the Basotho Nation, ensuring that any school infrastructure expansion aligns with national regulations. Section 35 mandates that land development projects obtain consent from the Commissioner of Lands, ensuring legal compliance. Sections 54 and 56 outline procedures for land expropriation for public purposes, which, while not immediately applicable, are important if future expansions require additional land.	The act governs land tenure and usage, ensuring that school expansions comply with legal requirements, do not encroach on protected or private land, and align with sustainable land use practices. It also helps resolve potential disputes regarding land ownership and access when expanding school infrastructure.
6.	National Strategic Development Plan II 2018/19 to 2022/23	The education sector in Lesotho plays a crucial role in national development by improving literacy, skills, and human capital. The government has prioritized universal access to education, particularly through free primary education and investments in secondary and vocational education. The National Strategic Development Plan II (NSDP II) emphasizes improving education quality, enhancing technical and vocational skills, and aligning education with labour market	The Lesotho Education Improvement Project (LEIP) aligns with NSDP II by focusing on enhancing education quality, reducing learning disparities, and promoting equitable access to education. The plan emphasizes integrating digital learning, improving school infrastructure, and fostering public-private partnerships to strengthen the education system. Through LEIP, the government aims to address systemic education challenges, ensuring that education supports national

No.	LAWS AND POLICIES	INTERPRETATION	RELEVANCE TO THE PROJECT
		demands to support sustainable development and economic growth.	development priorities, including skills development for economic transformation.

Table 5E: International Conventions and Protocols that Lesotho has acceded to

No.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
1.	International Law on the right to education	<p>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.</p> <p>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.</p>	<p>The whole LEIP programme is geared at fulfilling the requirements of this convention by stepping in and improving student retention and teaching quality⁴ in junior secondary schools in targeted regions of Lesotho and piloting a new curriculum to strengthen ECCD service delivery.</p> <p>The project will not be able to address all the constraints that limit the efficiency and productivity of the basic 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.</p>
2.	African Charter on the Rights and Welfare of the Child (1990)	<p>The African Charter on the Rights and Welfare of the Child -ACRWC or Children's Charter was adopted by the Organisation of African Union-OAU in 1990 and 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 LEIP programme is geared at fulfilling the requirements of this convention by improving student retention and teaching quality in junior secondary schools in targeted regions of Lesotho.</p> <p>The project will target districts with the highest dropout rates and children from the poorest households.</p>

⁴ Teaching quality under this project refers to teacher content knowledge and pedagogical skills in Mathematics and Science.

No.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
3.	Convention on the Rights of the Child	<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>	LEIP is geared at fulfilling the requirements of this convention by improving the quality of education and teaching quality in junior secondary schools in targeted regions of Lesotho
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 the 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 suppression and Punish, Human	This protocol is intended to prevent and combat human trafficking crime and facilitate international cooperation against	It is critical that LEIP execution of construction work by all contracted parties should carefully observe the provisions of this convention. It should be expected that

No.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
	Trafficking in Persons, especially Women and children, 2003	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.	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</p>	<p>The activities of the Lesotho LEIP 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 hazardous waste according to the Basel Convention.</p>

No.	POLICIES AND PLANS	INTERPRETATION OF THE POLICY	RELEVANCE TO THE PROJECT
		of waste.	
7.	United Nations Framework Convention on Climate Change	UNFCCC is an international environmental treaty adopted in 1992, aimed at combating climate change by limiting average global temperature increases and addressing its impacts. It lays the foundation for international cooperation on greenhouse gas emissions and adaptation strategies.	The LEIP project is not anticipated to emit greenhouse gases and therefore, will not contribute to climate change, which has negatively impacted the Basotho through extreme weather events. Nevertheless, the project should incorporate climate-resilient infrastructure and embrace environmentally sustainable practices, including energy-efficient and low-carbon technologies where applicable.
8.	The Convention on Biological Diversity - CBD	CBD was adopted at the Earth Summit in 1992. It aims at conserving biological diversity, promoting sustainable use of its components, and ensuring fair and equitable sharing of benefits arising from genetic resources.	The LEIP project must consider the protection of local biodiversity, avoid disturbance to sensitive ecosystems, and apply sustainable land-use practices.

Since LEIP is financed by the World Bank, it has to comply with the Bank's Environmental and Social Framework, which consists mainly of the environmental and social policy with ten (10) Environmental and Social Standards as outlined in Appendix 5. It uses these standards to examine potential environmental and social risks and benefits associated with Bank lending operations as reflected in Table 1F. The standards, as already mentioned, are designed to avoid, mitigate, or minimize adverse environmental and social impacts of projects supported by the bank.

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 Bank maintains that the application of these standards, by focusing on the identification and management of environmental and social risks, will aid Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. These standards,

- support Borrowers in achieving good international practice relating to environmental and social sustainability,
- assist Borrowers in fulfilling their national and international environmental and social obligations,
- enhance non-discrimination, transparency, participation, accountability, and governance, and
- 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 6F: Relevant World Bank Environment 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 a 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 an experienced Environmental Specialist and Social Specialist to undertake environmental and social assessments and monitoring during the 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 have been identified 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>

No.	WORLD BANK ESSS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
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 the 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 ESMFs 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 ESMFs.</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 the 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</p>

No.	WORLD BANK ESS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
				<p>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 the prevention and mitigation of GBV/SEA risks involving project workers will be put in place before the project's effectiveness. The LMP will include requirements for the 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>
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>

No.	WORLD BANK ESSS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
				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.
4.	ESS4: Community Health and Safety ⁵		√	<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>

⁵ **World Bank Environmental Health and Safety Guidelines (EHSG)** are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). It contains 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 Decommissioning, .

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

No.	WORLD BANK ESSS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
				<p>Lesotho has made efforts to attain gender equity and equality, but legislation, cultural norms and practices still contain 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 the related procurement.</p> <p>⁶The project will ensure the avoidance of any form of GBV based on the GBV An Action Plan has been prepared for this project and is attached in Annex VI.</p>
5.	ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary	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>

⁶ 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.

No.	WORLD BANK ESSS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
	Resettlement			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 prepared and implemented in each facility/school/ECCD centre during Project implementation.
6.	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources		√	<p>ESS6 emphasizes the importance of biodiversity conservation and sustainable management of natural resources as essential components of sustainable development. It highlights the need to preserve the ecological functions of habitats, including forests and their biodiversity. Additionally, ESS6 focuses on the responsible management of primary production and resource harvesting, ensuring that project activities do not compromise ecosystem health. It also acknowledges the necessity of considering the livelihoods of affected communities, including Indigenous Peoples, whose access to or reliance on biodiversity and natural resources may be impacted by a project.</p> <p>The LEIP will implement environmental assessments, sustainable site selection, to protect biodiversity and natural habitats. Measures include avoiding ecologically sensitive areas, using eco-friendly materials, and preserving vegetation. The project will also engage local communities and ensure proper waste management and pollution control. Compliance with environmental laws and continuous monitoring will help maintain ecological balance, ensuring that educational infrastructure development aligns with sustainability and biodiversity conservation goals.</p>
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.

No.	WORLD BANK ESSS	RELEVANT TO THE PROJECT		EXPLANATION
		No	Yes	
8.	ESS8: Cultural Heritage	X		ESS8 is not considered relevant, no project activities are expected to have an 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 relates 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 as also explained in Table 2. 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.

4.1 COMPARISON OF LESOTHO AND WORLD BANK PROJECT CLASSIFICATION

4.1.1 Lesotho legislation

The Lesotho legislation classifies projects and its activities into three categories as outlined hereunder:

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. When it comes to the environmental impacts, some 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.

4.1.2 The World Bank

The World Bank requires that all projects financed by the Bank be 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 as having moderate risks based on the categories outlined in Table 2.

Table 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.

CLASSIFICATION	DEFINITION
Moderate 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.

While Lesotho's EA procedures are generally consistent with the Bank's Standards, It is quite important that potential site specific adverse localized impacts identified and mitigated through ESMP as also contained in this ESMF. Table 3 describes the gap analysis and comparison of World Bank and Lesotho environmental and social assessment procedures.

Table 8: Comparison between the Bank and Lesotho ESA procedures

SUBJECT/ ISSUE	WORLD BANK ESF	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 the design of all projects
Screening Criteria	<p>The Bank's project screening criteria group projects into three categories depending on the severity of impacts:</p> <ul style="list-style-type: none"> • High Risk – Detailed Environmental Assessment, • Substantial Risk – Initial Environmental Examination, • Moderate Risk - • Low Risk – Environmentally friendly. 	Only projects classified as category 3 require full EIS	<p>LEIP is classified as Moderate Risk under the World Bank's Environmental and Social Risk Classification and is required to prepare an overall ESMF and site specific ESMPs for sub-projects.</p> <p>Projects involving activities with limited unfavourable environmental or social settings, as well as social hazards and/or repercussions that are few in number, often site specific, highly reversible, and easily handled through mitigation measures. Examples of these projects include small-scale agricultural initiatives, school and hospital buildings, forest management efforts, and low-emission energy projects. Hence, the reason the LEIP project is classified as Moderate Risk</p>
	ESMF is used for the 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.	LEIP will use the environmental and social screening process as described in this ESMF.
Environmental and Social	ESMPs are required for each set of activities (e.g., sub-projects) that may	In addition to EIS for category 3 projects, no other plans are	ESMPs will be prepared for each sub-project to be financed under Lesotho LEIP and will include

SUBJECT/ ISSUE	WORLD BANK ESF	LESOTHO POLICY	SOLUTION/MITIGATION
Management Plans (ESMPs)	require specific mitigation, monitoring and institutional measures to be taken during implementation.	prepared	specific mitigation, monitoring and institutional measures to be taken during implementation
Disclosure	The World Bank requires ESIA reports to be: 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 the public	Upon completion of ESIA reports, these must be: 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.
Environmental, Health and Safety (EHS) Guidelines	The World Bank Group EHS Guidelines provide detailed technical reference documents covering four main areas: a) Environmental (air emissions, water quality, waste, noise, hazardous materials). b) Occupational Health and Safety (hazard prevention, PPE, training). c) Community Health and Safety (traffic safety, emergency response, communicable diseases). d) Construction and Decommissioning (site safety, emissions, waste).	There is a general provision under EIA regulations. However, with the enactment of the Occupational Health and Safety Act 2024, there is now a legal framework addressing workplace safety, employee protection, and accident prevention.	The World Bank EHS Guidelines will be applied alongside the 2024 Occupational Health and Safety Act to ensure alignment with both international best practices and national legal obligations.

5. DESCRIPTION OF EXISTING BIO-PHYSICAL AND SOCIO-ECONOMIC ENVIRONMENT

The project will be implemented nationwide throughout the country. The following section the description of the existing environment, comprising the bio-physical and socio-economic condition of Lesotho.

5.1 BIO-PHYSICAL ENVIRONMENT

5.1.1 *Geophysical environment*

Lesotho is a landlocked country in Southern Africa, surrounded by the Republic of South Africa. It is situated approximately between 28° S and 31°S latitudes and longitudes 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 has three distinct geographical regions, demarcated by ascending altitude, extending 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 as reflected in Figure 1, the Maloti Mountains, runs north and south. Where it joins the Drakensberg Range there is a high plateau ranging from 2,700-3,200m 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.

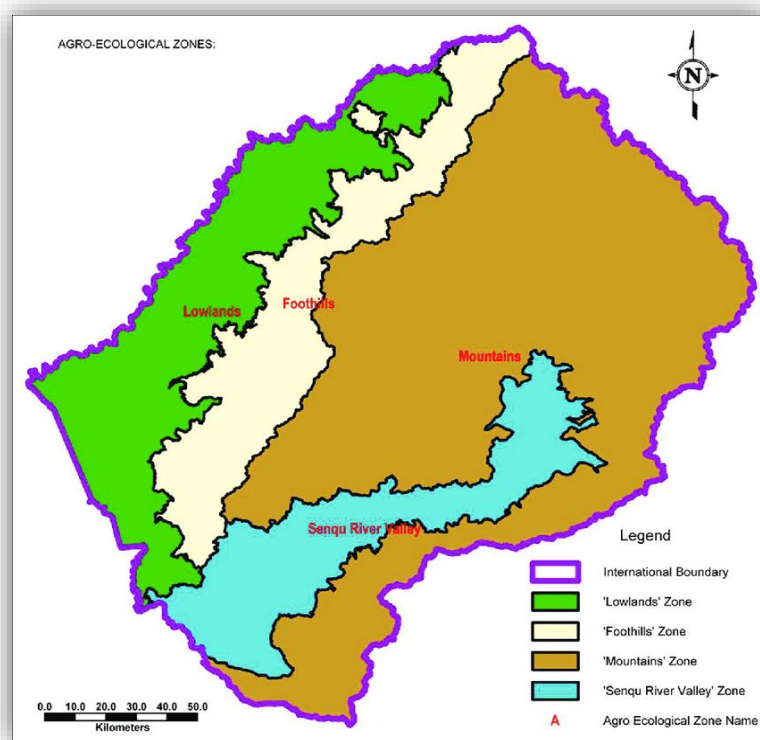


Figure 1: Lesotho Ecological Zones

(Source: Lesotho Ministry of Public Works and Transport, 2021)

5.1.2 Geohydrology

The geohydrology of an area is influenced by the rock type and soil type formed from that rock or weathered products from other rock type. The groundwater storage bodies are termed aquifers. The aquifers of Lesotho are within the fissured Karoo sedimentary aquifer that covers 165 900 km². About 2.5% of annual rainfall recharges the groundwater system (Davies.J, 2003). There is a concern of the low water yields of aquifers in Lesotho; however, each formation has varying yields. The Clarence formation does not form good aquifers and have low yields and is unreliable in dry seasons. The Elliot formation yields a range from 0.1 l/s to 0.2 l/s. The yields in Molteno formation vary from 0 to 1.6 l/s. Borehole mean yields in Beaufort formation are 1.16 l/s and most of these boreholes are drilled close to dolerite dykes or cut through them (Schmitsz.G ,Royani.F, 1987).

Some of the abovementioned aquifers and their parameters are presented in table 4.

Table 9: Hydrogeological parameters of rock formations

FORMATION	TRANSMISIVITY (m ² /day)	STORATIVITY	DEPTH TO WATER TABLE (m)	COMMENTS
BEAUFORT	20	0.00117	22	Semi-confined to confined low permeability.
MOLTENO	20	0.001	24	Low permeability under semi-confined groundwater conditions.
ELLIOT	24	0.0005	27	Low permeability confined sandstones in hydraulic conductivity with Molteno.
CLARENCE	5	-	28	Low permeability aquifers.

5.1.3 Surface Water Resources

Some of the schools, like LEC Primary School at Ha Motlere, are located within 200m from a dam, which is located at a lower elevation than the schools thus it receives runoff from the school. The dam shown in photo 1 is mostly used for livestock, watering and domestic purposes such: washing clothes and washing cars. The dam is vulnerable to pollution due to runoff from school and residential area upstream and eroding soils. The water quality parameters are not monitored. It is also important to note that there is fish and other birds that spend most of their lives in this dam. There are also wetlands in other parts of the schools and therefore more plant diversity.

Visual observation suggests that the stagnant water is unclean. The green colour observed in the dam might be attributed to eutrophication – nutrient enrichment of a water body due to the sewage washed off from the dilapidated toilets from a nearby Mafeteng LEC primary school. The water also shows a high content of sediments resulting from soil erosion by water.



Photo 1: Ha-Motlere dam is within 200m from Mafeteng LEC Primary

5.1.4 Climate

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, 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 temperatures during the day, but becomes colder after sunset.

5.1.5 Topography

Lesotho has a fragile ecosystem because of its topography. The topography shown in Figure 2 is mountainous within sharp terrains ranging from 1460 to 3400 meters above sea level. It consists of 17% of lowlands (below 1,800 mamsl), 15% foothills (between 1 800 – 2 300 mamsl) and 59% mountains (above 2 300 mamsl) Senqu Valley is 9% (Bernice 2021). The topography of the study area is characterised by a rugged landscape with gully erosion. The slopes are gentle and steep on the western side. These slopes are dominantly between 0 and 20%. The semi-circular hills are mostly within 50 and 80%. Motšoane (2014) shows an important role of slope (0 to 4.8%) and land use in gully erosion of similar soils in Berea. Therefore, soil conservation methods for these soils should be carried out generously.

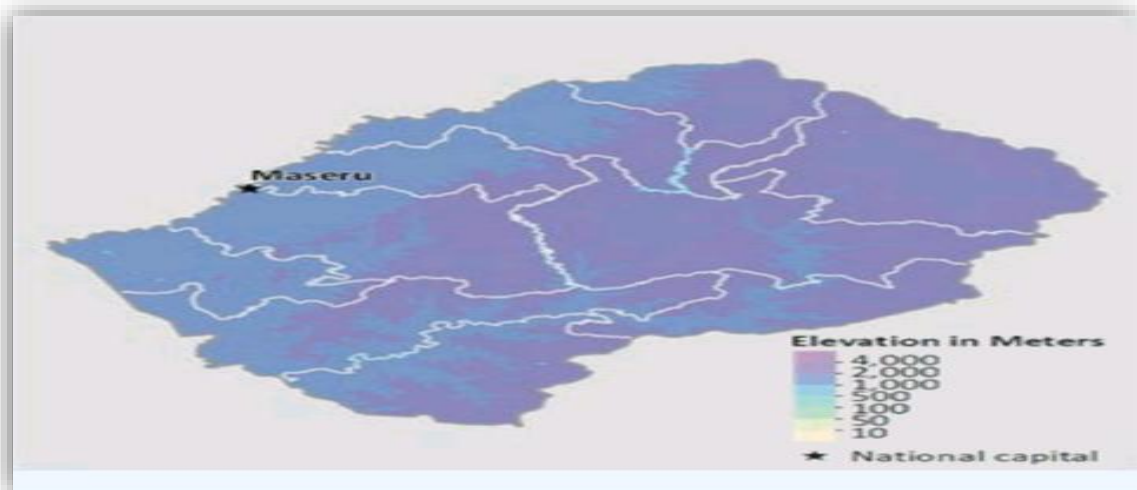


Figure 2: Lesotho Elevation Map

(World Bank Group.,2021)

5.1.6 Soils

The soils of Lesotho are classified according to the Lesotho Soil Association classification as shown in Figure 3. The soil series are named after a village or geographic features near the soil sampling area. The soil series of the study area for instance are: Rockland (sandstone), Berea Ntsi Matela and Sephula Maseru. These Gullied Land soils are shallow to deep and are mostly poorly drained to very poorly drained. These soils are found along the Mohokare River and are derived from sandstone and basalt derived loam with a clay loam or clay texture. They are found below the Clarence formation. Sephula soils form most of the deep, wide and active gullies. These soils have low organic carbon (Retention of applied phosphorus by the

benchmark soils of Lesotho and the quantification of their phosphorus retention indices, 2005)). Rockland (sandstone) Berea Ntsi Matela soils are situated in thin Ntsi soils and drain into the poorly drained Berea soils on gently sloping areas, which in turn drain into the well-drained Matela series.

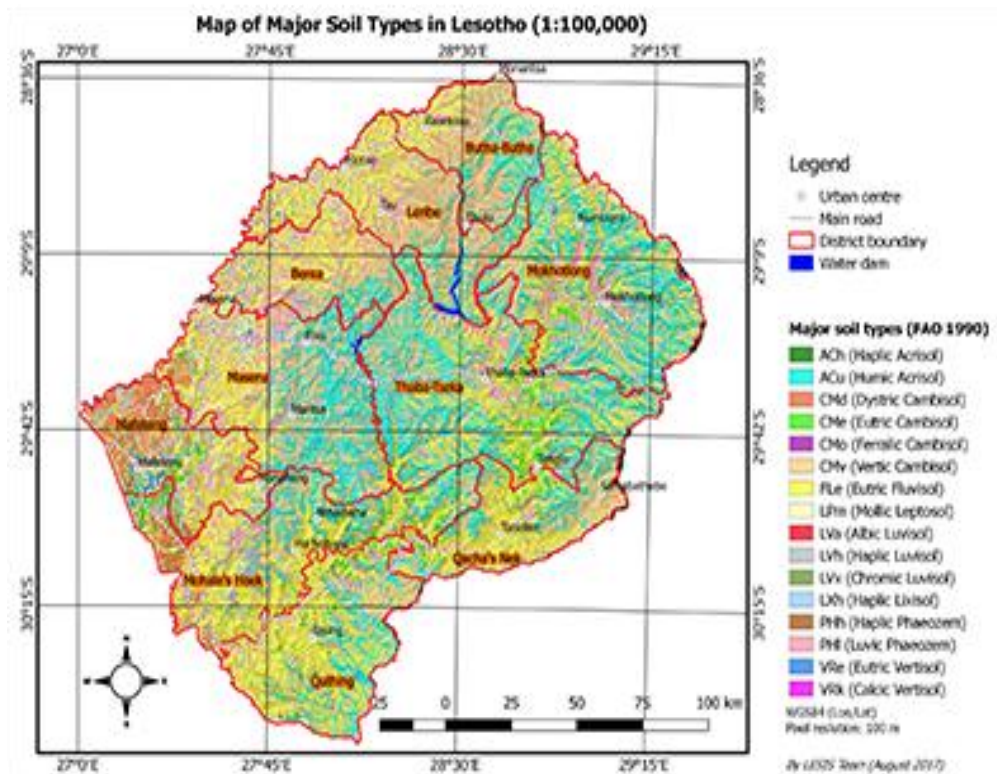


Figure 3: Soil types of Lesotho

5.1.7 Biodiversity

5.1.7.1 Flora

Lesotho is mainly a grassland biome with six grassland or vegetation types owing to its climate and altitude (Brendenkamp G.J, Mucina L, Granger J.E, 1996). Many school campuses are covered by grass such as *Cenchrus clandestinus*. Most primary schools are dominated by *Paspalum setaceum*, which is a lawn grass and an invasive plant, with patches of *Pennisetum clandestinum*. Within the campus of different schools, there is a small plantation of exotic trees. These include: *Pinus pinaster*, *Salix babylonica*, *Eucalyptus camaldulensis*, *Punica granatum*, *Opuntia ficus-indica*, *Malus domestica* and *Acacia x dealbata*. Some parts of the school territory are also dominated by invasive species such as: *Xanthium spinosum*, *Tagetes minuta*, *Rubus ulneifolius*, *Solanum incanum*, *Berkheya multijuga*, *Argemone ochroleuca*, *Agave Americana*, *Nicotiana glauca*, *Hypochaeris radicata*, and *Sesbania punicea*. There are also small flower gardens in primary schools, which include Matholeng, St John's ACL and Mafeteng LEC. The flower species include: *Portulacaria afra*, *Portulaca oleracea*, *Coriandrum sativum* and in some primary schools, there is an endemic species of Lesotho, the *Aloe polyphylla*. (Brendenkamp G.J, Mucina L, Granger J.E, 1996).



Photo 2: *Dahlia pinnata* at Matholeng primary



Photo 3: *Cenchrus clandestinus* behind the toilets at Mafeteng LEC

5.1.7.2 fauna

Detailed information on the animals is very scarce, as such little is known about their abundance and distribution. Areas that have been surveyed are Sehlabathebe National Park, Phase 1A and 1B of the Lesotho Highland Water Project (Mahlelebe,2018). But the animals that were sported in most schools include *Bos taurus*, *Ovis aries*, *Passus domesticus*, *Streptopelia capicola*, *Corvus albus*

5.2 SOCIO-ECONOMIC ENVIRONMENT

The country is a lower-income country with a population of 2.2 million in 2017 with Gross National Income **per capita** of US\$1,280 (in current US\$).⁷ It generates income mainly through the agriculture sector, and from exporting textiles, water, and diamonds.

The economy of Lesotho expanded by an anticipated 2.3% in 2024, compared to 1.8% in 2023. The Lesotho Highlands Water Project – Phase II (LHWP-II), the Lesotho Lowlands Water Development Projects and other government capital investments, like roads, are the main causes of this increase. Economic growth was also supported by the favourable spill-over effects that these projects produced in the services sector. Export-oriented sectors, such as textiles, clothes, and mining, underperformed due to reduced foreign demand and decreased commodity prices. The job market is still fragile, still with a high rate of unemployment and poverty.

Inflation dropped to 3.6% in January 2025, from 5.2% in September 2023, as fuel and food costs declined and the Rand strengthened. The Central Bank of Lesotho cut the policy rate by 50 basis points, from 7.75% in November 2024 to 7.25% per year in February 2025. Lesotho recorded an 8.8% budget surplus in 2024, driven by increasing Southern African Customs Union (SACU) income (from 14.4% in 2022 to 27.8% of GDP in 2024) and greater water royalties (from 3.7% in 2022 to 7.2% of GDP in 2024). Given the existing capital spending constraints and some recurrent spending restraints, the increase in revenues did not coincide with a corresponding increase in public expenditures. Authorities also used a portion of the budget surplus to pay 1.8% of GDP in arrears, leaving approximately 0.6% to be cleared.

5.2.1 Population Characteristics

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 5.0% of the population was over 65 years of age, with another 38.0% 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 70.0% 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 13.0% 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

⁷ World Bank National Accounts Data.

a population of 170,000 in that year. Other large towns are Leribe, Berea, and Mafeteng.

5.2.2 Main Sources of Income

According to the Continuous Multipurpose Survey/Household Budget Survey (2017/2018), the public, private, and farming sectors produced income for the majority of households. Some households made money through domestic companies, pensions, and remittances, whilst others relied mostly on social welfare. Table 5 displays the sources of income by district. According to the report, the majority of households rely on incomes and salaries from the private (26.5%) and public sectors (15.6%). Only 1.6% of households consider social assistance as their principal source of income. In urban areas, revenue is generated by the private sector (36.5%), public sector jobs (23.8%), and household enterprises (14.6%). Rural households, on the other hand, rely mostly on private sector earnings, pensions, and occasional employment for their total income, accounting for 19.8% and 18.0%, respectively.

Table 10: Distribution in % of Households by Main Source of Income and District - 2017/2018

SOURCE OF INCOME	TOTAL (%)	BOTHA-BOTHE	LERIBE	BEREA	MASERU	MAFETENG	MOHALE'S HOEK	QUTHING	QACHA'S NEK	MOKHOTLONG	THABA-TSEKA
Wages and salaries from the public sector	15.6	13.1	12.8	18.7	21.2	11.5	12.1	12.9	11.3	9.6	11.6
Wages and salaries from the private sector	26.5	21.5	33.9	21.2	33.6	22.9	17.6	24.1	14.6	18.4	18.3
Farming	7.5	8.5	5.2	5.0	4.4	7.3	9.2	10.1	12.8	15.7	22.0
Casual work	12.3	11.9	14.5	12.5	7.9	14.4	16.4	12.5	14.2	17.5	13.4
Household business	11.0	13.9	11.4	11.5	11.4	9.6	10.5	9.0	9.8	9.7	9.3
Pensions	13.3	15.4	11.6	14.2	8.8	16.0	18.8	16.8	16.7	16.7	16.8
Remittances from abroad	4.4	6.0	4.3	4.5	3.6	4.8	5.1	6.7	9.9	2.8	1.8
Other remittances	4.9	4.9	4.1	5.4	4.0	10.0	6.2	4.4	5.7	3.8	2.1
Social assistance	1.4	1.1	0.9	2.3	1.1	1.2	1.5	2.0	2.3	0.7	1.4
Other (specify)	3.2	3.5	1.4	4.7	4.0	2.3	2.5	1.5	2.8	5.1	3.2
TOTAL (%)	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
TOTAL (N)	425,915	26,480	71,989	48,919	106,180	48,334	37,464	24,518	13,710	19,496	28,825

(Source: BoS, 2017/18 Continuous Multi-Purpose and Household Budget Survey (CMS/HBS))

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. It means that women must find alternative ways to make ends meet, such as selling handcrafts, brewing beer, or working on neighbour's farms. Thus, community members will be available to provide labour for construction of infrastructure components of LEIP.

5.2.3 Education

Officially, almost all children enrol at primary school level but only half complete their final year. Only 41.0% of children complete lower secondary school, and enrolment in secondary is 33.4%. There is no free education at secondary schools, resulting in some families not affording school fees. 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 is still a significant number of adults who cannot read and write.

Table 6 indicates the distribution of enrolment in registered public and private secondary schools by district and sex in 2020.

Table 11: Distribution of Enrolment in Registered Public and Private Secondary Schools by District and Sex, 2020

DISTRICT	PUBLIC			PRIVATE			TOTAL
	M	F	T	M	F	T	
Botha-Bothe	4020	5497	9517	39	34	73	9590
Leribe	9714	12976	22690	373	486	859	23549
Berea	7434	9130	16564	166	233	399	16963
Maseru	14900	18135	33035	976	1018	1994	35029
Mafeteng	6144	7673	13817	104	105	209	14026
Mohale's Hoek	3614	4876	8494	0	0	0	8490
Quthing	2573	3241	5814	0	0	0	5814
Qacha's Nek	1785	2803	4588	0	0	0	4588
Mokhotlong	1583	3112	4695	0	0	0	4695
Thaba-Tseka	1652	3136	4788	0	0	0	4788
TOTAL	53,419	70,579	123,998	1,658	1,876	3,535	127,532

(Source: BoS Education Statistics Report, 2020)

5.2.4 Health

Diseases such as TB and HIV/AIDS are wreaking havoc in Lesotho with 24.0% of the population found to be infected. The scourge was exacerbated by migration, which generally exposed people to a high-risk 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, covering funeral expenses and supporting orphans. With an HIV prevalence of 24.0%, Lesotho ranks as the second country most impacted by HIV/AIDS in the world.

Health services in Lesotho are limited both in scope and quality. A priority of the country's government is to upgrade access to health services. However, despite continued investment in the sector, social and health conditions have deteriorated, particularly in the rural areas as poverty worsens and HIV/AIDS continue to spread as reflected in Table 7. With the upsurge of HIV/AIDS related chronic diseases, family members have assumed greater roles in care giving, that drain household resources,

depresses productive capacities and further exacerbates food insecurity and stress on health care services.

Table 12: Percentage HIV positive among women and men age 15-59 who were tested, by socioeconomic characteristics, Lesotho 2020

HIV INDICATOR	WOMEN	95%CL	MEN	95% CL	TOTAL	95%CL
Annual incidence (%)						
15-49 years	0.81	0.37-1.24	0.33	0.03-0.64	0.55	0.28-0.81
15-59 years	0.72	0.33-1.11	0.31	0.03-0.59	0.50	0.26-0.74
15 years and older	0.64	0.30-0.97	0.28	0.03-0.52	0.45	0.24-0.67
Prevalence (%)						
15-49 years	27.9	26.6-29.2	15.7	14.6-16.9	21.7	20.7-22.7
15-59 years	29.3	28.0-30.5	17.8	16.7-19.0	23.5	22.5-24.5
15 years and older	27.4	26.2-28.5	17.8	16.7-18.8	22.7	21.8-23.6
Viral load suppression (%)						
15-49 years	81.0	79.0-83.1	71.9	68.3-75.4	77.6	75.6-79.7
15-59 years	82.5	80.7-84.4	75.5	72.5-78.5	79.9	78.1-81.6
15 years and older	83.00	81.8-85.1	77.1	74.4-79.9	81.0	79.4-82.7

(Source LePHIA, 2020 (LePHIA, 2020))

5.2.5 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.

5.2.6 Gender Based Violence (GBV)

Lesotho has made efforts to attain gender equity and equality, but GBV incidences 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 mechanisms, establishing women's professional networks and access to up skilling and training opportunities.

6. THE POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

6.1 INTRODUCTION

This chapter outlines the environmental and social screening process for the project, impact identification and the possible mitigation measures. Since the actual project sites are yet unknown, potential impacts described below are general and serve as a guideline for further assessment on sites also using screening process as attached in Appendix 1.

6.2 ENVIRONMENTAL AND SOCIAL IMPACT ANALYSIS

Taking into considerations the proposed project activities, the potential environmental and social impacts were identified through a comprehensive desk review or secondary data collection process.

6.2.1 Positive Impacts

Based on the desk review environmental and social checklist screening carried out with other similar World Bank Funded projects in the Ministry of Education in Lesotho and other developing countries, this sub-project is classified as a category C project. Thus the project is envisaged to have minimal environmental and social impacts resulting from the construction activities, waste and socio-economics related activities.

The envisaged project activities including construction activities shall directly contribute to the project's original focus of addressing challenges of equity and quality of education in Lesotho and achievement of the main development objective of improving basic education service delivery and student retention in targeted schools, with a view to amongst others, improving teacher content knowledge, reducing drop-out rate, and thus improving the inverse retention rate in the targeted schools.

The positive impacts are:

- To increase access through enrolment of pupils resulting from improved environment which the new school block(s) will provide;
- Classroom construction will provide an improved learning environment that will attract additional enrolments resulting in increased access to secondary education;
- Job creation: Implementation activities will have a positive impact for the local economy, particularly with regard to job creation (labour for construction works, maintenance and monitoring) and related activities such as petty trading;
- Income generation: Civil works will have some impacts on the local economy, with the use of local SMEs whose project will lead to a high use of labour;

- The classrooms will reduce the teacher-pupil ratio and result in improved learning;
- The construction of science and computer laboratories will result in improving learning and assist students to undertake evidence-based research and experiments;
- Creation of job opportunities for the locals, such as artisans;
- Improved health outcomes, especially for pupils, which will be a result of the proper use of VIP latrines once constructed;
- Improved quality of teaching and learning in schools where the environment impedes the quality of teaching;
- Prevention of faeco-orally transmitted diseases and improved hygiene resultant from use of modernized pit latrines that isolate human excreta from the surrounding environment;
- Improved disposal of human waste from the traditional disposal methods including simple latrines and squatting.

Alternating double pits is a good system for schools as it allows for continued long term used and thus is a superior choice to a conventional single pit latrine. A conventional VIP latrine requires a new pit to be dug every time one gets full. They can be susceptible to failure/overflowing during floods. Other disadvantages can be overcome by proper design, construction and usage. For example, if the superstructure is not properly constructed, it may discourage use of the latrine. Children may be discouraged from using the latrine if the slab is not designed with them in mind and is too big for them. Suitability and appropriateness to the remote rural areas where the schools are located and there is no adequate water supply. Some of the benefits of the alternating double pits include:

- The human excreta alternating double pits will allow the excreta to drain, degrade and transform into a nutrient-rich, safe humus material that can be used to improve soils.
- They avoid contamination of surface water and top soil if properly installed and maintained.
- They can be constructed with minimum cost using local materials and local skills.
- The presence of properly constructed slabs will allow easy cleaning and avoid flies and unsightliness.

6.2.2 Negative Impacts.

The adverse environmental and social impacts of this project at the implementation stage are anticipated to be as follows:

- Waste generation and poor disposal of construction material.
- Health risks such as outbreaks of diseases due to, for example:
 - poor hygiene resulting from possible contamination/pollution of especially downstream ground/well water if the latrines are not well located;

- Those schools located close to dams can be polluted, affecting the water quality;
 - Fumes and foul smell from poorly maintained pit latrines; Risk of accidents of young children falling into pit latrines due to unsupervised usage or poor construction quality.
- During site preparation and construction, work noise will be generated due to construction related work. During school hours this may disturb classroom activities and residents living close to the construction site.
- Dust generated during clearing and construction work can cause difficulties for students who have respiratory problems and become a nuisance during school hours. Soil/ gravel kept for long periods without proper cover can generate dust and become an inconvenience during school hours and for surrounding residents. Transportation of materials to the site will also generate dust. Decommissioning of existing structures can also create dust that is potentially hazardous.
- Transportation of construction material to and from the site will likely create disturbances during school hours and can cause injury to children and increase traffic congestion in the area.
- Possible distraction of regular movement where walking through the schools by the community is a norm for different reasons including the availability of a communal water source or where the playground is used for a local team
- Risk of accidents in cases where the walkways pass through the school site
- Pit latrines may also fill up very fast (as the urine cannot escape the pit) which may result in high costs to empty and maintain the latrine.
- Threat of school infrastructure insecurity due to exposure of unprotected school premises to trespassers may arise
- Discontent at the community level, owing to the challenges of community level recruitment of unskilled labour, may be generated.
- Escalation of threat to security due to exposure of the school premises to trespassers
- Injuries from accidental discharge of construction materials during transportation to site
- Safety of workers, community workers, school children and residents is likely to be an issue. Construction-related operations could generate safety risks to workers. Given that work will be on school premises, construction sites that are not cordoned off can cause potential safety hazards to students and residents who are too close to the construction site.
- There are potential risks of Gender Base Violence (GBV), and Sexual Exploitation and Abuse (SEA) during the construction activities. It will be important that the Community Construction Team (CCT) has a Code of Conduct for the construction activities in order to avoid this type of risk during construction.
- Occupational Health and Safety risks associated with lack of adequate occupational health and safety measures used on site, including lack of personal protective equipment (PPE); and

- Labour and working conditions – compliance with national laws and ILO conventions, collective bargaining agreements, employment practices and risks of labour standard violations.
- E-Waste and hazardous solid waste related environmental risk as a result of disposal of the ICT equipment and solar panels.

6.2.3 Significance Rating of Potential Environmental and Social Impacts

The objective of significance of rating is to identify areas where there is significant impact on the environment and people with the view to come with appropriate mitigation measures. 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 as per Table 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, as shown in Table 8. The ESMP constructed 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 in Table 9, where the magnitude = Probability + Severity + Extent + Duration

Table 13: 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.

Table 14: 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 and Solid Generation	<ul style="list-style-type: none"> Waste generated from the end of life of laptops, solar panels, construction materials, 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)
	Noise generation	<ul style="list-style-type: none"> Noise generated as a result of construction 	<ul style="list-style-type: none"> Potential for ear health problems for the students 		2	2	2	4	
	Dust Generation	<ul style="list-style-type: none"> Dust generated from the construction of latrines, laboratories and additional classrooms 	<ul style="list-style-type: none"> Potential for respiratory health problems for the students. Lung disease problems, such as TB 		2	2	2	4	
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 	<ul style="list-style-type: none"> Anxiety and anticipation, Limited cooperation Suspicion and hence concealing important information. 		2	1	1	1	5 (Not Serious)

REF:	PARAMETER UNDER CONSIDERATION			CRITERIA FOR ASSESSMENT OF POTENTIAL IMPACT					
	CATEGORY	CAUSE	IMPACT	QUALITY	PROBABILITY	SEVERITY OR SIGNIFICANCE	SCALE	DURATION	MAGNITUDE OF IMPACT
		<ul style="list-style-type: none"> • Dragging the planning phase too long 							
2.3	Targeting	<ul style="list-style-type: none"> • Using top-down approach • absence of clear selection criteria • Failure to recognise vulnerable populations 	<ul style="list-style-type: none"> • Conflict within communities • Perpetuating gender inequalities 		4	2	4	2	12 (Acceptable but Undesirable)
2.4	Occupational Health and Safety Issues	<ul style="list-style-type: none"> • Weak technical capacity and/or negligence in operation of computers and solar panels. 	<ul style="list-style-type: none"> • Temporary and permanent physical injuries 		2	1	1	1	5 (Not Serious)
2.5	Gender Based Violence/SEA	<ul style="list-style-type: none"> • Poverty, which leads to women being exploited by men during installations and project implementation. 	<ul style="list-style-type: none"> • Physical body harm • Lack of productivity • Communicable disease incidences 		2	2	4	2	10 (Acceptable but Undesirable)

6.3 THE ENVIRONMENTAL AND SOCIAL RISK CLASSIFICATION (ESRC)

6.3.1 Environmental Risk Rating:

The environmental risk classification for the proposed Project is Moderate. 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 prominent activity is the construction of school facilities that include pit-latrines, additional school classrooms and a science laboratory in an already existing school. The above are embraced under component 2 within sub-component 2.1 and 2.2 respectively.

Under Sub-Component 1.1: Scaling up 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, ESS 4, and ESS 10.

6.3.2 Social Risk Rating:

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

- (i) There will be construction works, which means that there will be risks or impacts associated with ESS2 that is associated with labour disputes and management, ESS4 associated with occupational health issues, diseases outbreaks, GBV, SEA and STIs.
- (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 High, and
- (iii) In a nutshell the project has the potential to directly or indirectly cause or contribute to 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 (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, ESS3, ESS4, and ESS 10. The Project does not pose any social risks associated with ESS7 and ESS8, respectively. It is, however, noticed that the project may pose minimal risk associated with ESS6, more during the clearing and construction of additional classrooms, laboratories and pit latrines.

6.4 INCORPORATION OF IDENTIFIED RISK INTO THE ESCP

LEIP 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 LEIP 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.

LEIP 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.

LEIP 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 LEIP. This will include unforeseen circumstances, which may be revealed by site-specific Checklist ESMFs.

6.5 THE ENVIRONMENT AND SOCIAL MANAGEMENT PLAN (ESMP)

The objective of this ESMP is to mitigate the adverse impacts of the planning, implementation phases. It details the identified impacts, mitigation measures, responsibility for implementation and cost, amongst others. The sub-section after the ESMP matrix is the monitoring arrangement to ensure effective implementation and delivery of the project development objective. The proposed mitigation measures for the Lesotho LEIP Project (Table 10), 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 anticipated 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.

Table 15: 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 quality of teaching and learning in primary education (US\$ 3.3 million): 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. This project will focus on increasing teachers 'content knowledge and pedagogy. The pedagogical training includes how to use 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 access to the training program. The teachers will also receive face-to-face training in basic ICT skills.			
	Subcomponent 1.1: Scaling up online training models in maths and science for junior secondary school teachers (US\$1.5 million). The proposed LEIP will build on the experiences from the previous project and scale up the online teacher training initiative to cover more maths and science teachers in government secondary schools.	<ul style="list-style-type: none"> Potential of E-waste generation from the laptops, computers and solar panels supplied for e-learning. 	<ul style="list-style-type: none"> Train teachers and head teachers on GBV/SEA risks to protect their students from GBV/SEA. Capacitate contractors and teachers in both solid and E-waste management and disposal Focus group/engagement with parents to understand risks of GBV/SEA and potential mitigation measures. 	MoET PFU
	Subcomponent 1.2: Strengthening Foundational Learning (FLN) in Literacy and Numeracy in Primary Schools in Grades 1-3 (US\$1.5 million). This will include support for primary schools as well as multi-grade schools and strengthening District Resource Teachers' (DRT's) capacity to provide school-based professional support in foundational learning, and the use of ICT.	<ul style="list-style-type: none"> GBV/SEA risk that might emerge due to project intervention. Support groups/clubs themselves could expose to GBV/SEA risks New curriculum and teacher training may not include the information on the risk of GBV/SEA 	<ul style="list-style-type: none"> PFU conducts focus group interviews with group/club members semi-annually to make sure that they are not exposed to GBV/SEA but rather they are supporting each other. Provide training for support groups/clubs on how to mitigate GBV/SEA risks and how to report if any incidents are identified. 	MoET MoSD PFU

NO.	PROJECT COMPONENTS	POTENTIAL ENVIRONMENTAL, AND SOCIAL IMPACTS	MAIN MITIGATING ACTIONS	RESPONSIBILITY FOR IMPLEMENTATION
	<p>Subcomponent 1.3: Development and implementation of National Learning Assessment in Grade 9 (US\$ 0.3 million).</p> <p>This subcomponent would provide technical assistance to develop and conduct National Learning Assessments in Grade 9 on maths, science, English and Sesotho aligned with the current curriculum in junior secondary.</p>	<ul style="list-style-type: none"> • New curriculum and teacher training may not include the information on the risk of GBV/SEA • 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, • 	<ul style="list-style-type: none"> ▪ Integrate gender sensitive pedagogy as part of teacher training. ▪ Strengthen the Teachers' Code of Conduct ▪ Inform and encourage students to use the 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 the supplier, recycling facility or proper disposal site. 	MoET PFU
2.0	<p>8. Component 2: Enhance physical learning environment and conditions in primary and secondary schools (US\$ 15 million)</p> <p>This component will focus on improving infrastructure facilities in the already existing schools and this construction of additional classrooms, latrines and science laboratories.</p>			
	<p>Subcomponent 2.1: Improving infrastructure in targeted primary schools (US\$10 million).</p> <p>This subcomponent would (i) construct additional classrooms in existing primary schools; and (ii) provide furniture and toilets for girls, boys and staff in existing primary schools.</p>	<ul style="list-style-type: none"> ▪ Increased dust/reduced air quality, ▪ Noise, vibration and solid waste during the construction phase. ▪ Impacts on flora and fauna. ▪ Occupational Health and Safety risks (for both workers and community) as well as labour management risks. ▪ Labour influx-related impacts on GBV/SEA/SH and impacts on 	<ul style="list-style-type: none"> ▪ Ensure that the contractors and teacher training include the information and mitigation measures of GBV/SEA. ▪ Train teachers and contractors 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 	MoET PFU

NO.	PROJECT COMPONENTS	POTENTIAL ENVIRONMENTAL, AND SOCIAL IMPACTS	MAIN MITIGATING ACTIONS	RESPONSIBILITY FOR IMPLEMENTATION
		<p>disadvantaged and vulnerable groups within communities.</p> <ul style="list-style-type: none"> Violence Against Children (VAC), child labour, etc. 	<p>risks/impacts, with assigned responsibilities including procedures for addressing risks to SEA.</p> <ul style="list-style-type: none"> Sensitization of community, students etc. about project SEA-GRM 	
	<p>Subcomponent 2.2: Construction of laboratories in targeted secondary schools (US\$5 million).</p> <p>this subcomponent would (i) construct computer labs, biology-chemistry labs, physical science labs, and integrated science labs in the existing secondary schools; and (ii) provide lab furniture, toilets, electricity (where needed), and waste disposal facilities.</p>	<ul style="list-style-type: none"> ECCD Mapping exercise may increase the risk of GBV/SEA Potential to generate e-waste due to disposal of computers, laptops and solar panels where there is no electricity. Noise, vibration and solid waste during the construction phase. Impacts on flora and fauna. Occupational Health and Safety risks (for both workers and community) as well as labour management risks. Labour influx related impacts on GBV/SEA/SH and impacts on disadvantaged and vulnerable groups within communities. Violence Against Children (VAC), child labour, etc. 	<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 the project SEA-GRM 	MoET PFU
3.0	Component 3: Strengthen project management, technical assistance, and governance of the education system (USD 1.7 million)			

NO.	PROJECT COMPONENTS	POTENTIAL ENVIRONMENTAL, AND SOCIAL IMPACTS	MAIN MITIGATING ACTIONS	RESPONSIBILITY FOR IMPLEMENTATION
	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>Component 3.1. Decentralization of Teachers Service (USD 0.5 million).</p> <p>The objective is to reduce bureaucratic hurdles and administrative red tape, leading to a more responsive, streamlined, and efficient delivery of education services.</p>	<ul style="list-style-type: none"> • Project members may not be aware of GBV/SEA risks • Lack of resources in terms of finance and material may be a risk. • Relocation and displacement of staff to the district may also pose a threat. • Lack of consultation from planning stage of the project to implementation may lead low interest and participation therefore a risk. 	<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. ▪ PFU need to conduct through consultation with affected stakeholders 	MoET PFU
	<p>Project monitoring, evaluation, management, environment and social safeguards, procurement, financial management, and audit (US\$ 1.2 million).</p> <p>This subcomponent aims at strengthening MoET's institutional</p>	<ul style="list-style-type: none"> • Participation of the affected stakeholders during project formulation may pose a risk to project implementation. • Lack of capacity of affected stakeholders in Environment and Social Safeguards is also a risk. 	<ul style="list-style-type: none"> ▪ The PFU to conduct through stakeholders' consultations, as well as build the capacity of affected stakeholders in Environment and Social Safeguards ▪ Conduct training and awareness raising amongst MoET staff as a buy-in process. • Project management, capacity 	MoET PFU

NO.	PROJECT COMPONENTS	POTENTIAL ENVIRONMENTAL, AND SOCIAL IMPACTS	MAIN MITIGATING ACTIONS	RESPONSIBILITY FOR IMPLEMENTATION
	capacities to implement the LEIP especially as it concerns its planning, budgeting, monitoring, and reporting and compliance with the fiduciary aspects of financial management, procurement and environmental and social risk management safeguarding attuned to the Financing Agreement and the Project Operation Manual (POM) and project annual audit.	<ul style="list-style-type: none"> Lack of Project ownership by MoET Staff. 	building and technical assistance in selected areas.	

6.6 ENVIRONMENT 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 11). Individual sub-projects can prepare site-specific monitoring plans in line with the guidelines 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)?

This component covers monitoring, evaluation and reviews. It provides for training both the LEIP 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:

- i) the monitoring and evaluation issues of the whole programme
- ii) 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 16: 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 ICT 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 manufacturers 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 warranty of equipment	Document of 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/earmuffs) 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 Visits Document review	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
		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
		Waste generation and poor disposal of construction related materials	<ul style="list-style-type: none"> • The contractor shall ensure provision of the 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 is recycled/reused before opting to dispose of it. • Adhere to the requirements of the E-waste Management Plan. • Use of durable, long-lasting materials that shall not need to be replaced often. • Raise awareness of ensuring that the site goes back to its environmental status once all works are completed. • Train the School board for monitoring and ensuring corrective measures. 	# of waste bins at the site,	Site Visit Project progress reports review	Installation phase	Environment Expert
		Occupational health and safety: slip/fall, elevated noise,	<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 	Accident logs, First Aid Kits, Fire extinguishers	Site Visit Document review, and	Installation phase	Environment & Social Expert

No.	# KEY ACTIVITIES	POTENTIAL E&S RISKS AND IMPACTS	PROPOSED MITIGATION MEASURES	INDICATOR FOR MONITORING	MEANS FOR MONITORING	FREQUENCY OF MONITORING	RESPONSIBILITY
		dust, electrocution &	<p>serviced to ensure proper and safe equipment functionality,</p> <ul style="list-style-type: none"> • Use of safety signage “MEN/WOMEN AT WORK” to warn MoET 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. 		d photography		
		Gender-Based Violence	<p>The provision of the GBV/SEA and Child Protection Prevention and Response Action Plan shall be adhered to, include 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	<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 	<p># of reported cases at site,</p> <p># availability of IPC strategies for</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
		particular COVID-19	<p>and hand hygiene; and</p> <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 arrangements and procedures and disposal of waste generated from the MoET offices. 	hand and / incident erhygiene, use of wat log PPE			

No.	# KEY ACTIVITIES	POTENTIAL E&S RISKS AND IMPACTS	PROPOSED MITIGATION MEASURES	INDICATOR FOR MONITORING	MEANS FOR MONITORING	FREQUENCY OF MONITORING	RESPONSIBILITY
	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 Prevention and Response Action Plan, Project Labour Management Plan, and Stakeholder Engagement Plan. 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 	# 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
			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 a 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 in 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, and stores. • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangements and procedures and disposal of waste generated from the MoET offices /schools. 	# of reported cases at site, # availability of IPC strategies for hand and wat erhygiene, use of PPE	Field Visit Document review, an d 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	Procure Electronic devices from credible manufacturers to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. <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. 	Clearly labelled E-waste bins/receptacles , Warrant for the ICT Equipment Temporal E-waste collecting	Field Visit Document review, Photography	Annually	Project Coordinat or Environmen texpert

No.	# KEY ACTIVITIES	POTENTIAL E&S RISKS AND IMPACTS	PROPOSED MITIGATION MEASURES	INDICATOR FOR MONITORING	MEANS FOR MONITORING	FREQUENCY OF MONITORING	RESPONSIBILITY
		ground water,	<ul style="list-style-type: none"> Establish an E-Waste Temporal Collection Centre at MoET; including collection bins/receptacles. MoET shall return faulty ICT gadgets to the supplier depending on the 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. 	facility at MoET, Training record for E-Waste handling,			

6.7 INSTITUTIONAL FRAMEWORK

The following sections outline the institutional framework which has been broken down into three: i) the capacity of the LEIP 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, and partners) will be implementing the ESMF. This has been outlined per component.

6.7.1 Capacity of LEIP 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 Basic Education Strengthened Project (BESP). The proposed Project will be implemented through the existing BESP 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 has been capacitated with the position of Environmental and Social Specialist (E&S Specialist), which will ensure that the project is 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 the preparation and implementation phases of the Project to comply with ESF requirements.

The PFU E&S Specialist 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 the 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.

6.7.2 ESMF Implementation Arrangements

The MoET has engaged an Environmental and Social Specialist (ESS) to complement 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 is 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
- 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.

As shown in Figure 4, 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 for the sub-projects that will require them.

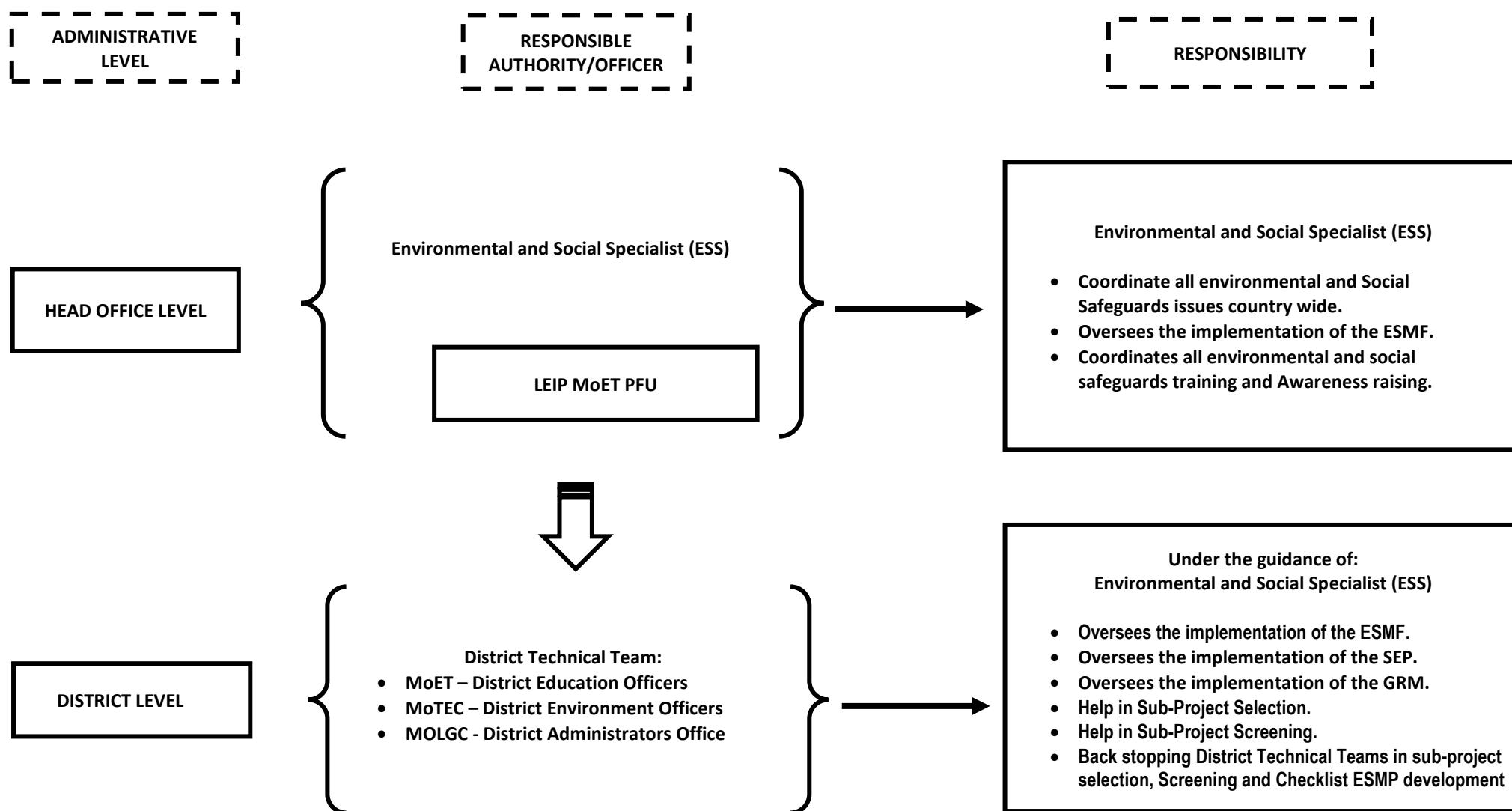


Figure 4: Organizational Chart for Safeguards Responsibilities

6.7.3 Education Facility Unit (EFU)

This unit is responsible for civil works technical aspects and associated activities of the MOET. Therefore, it shall have an overall supervisory role in the implementation of the Community Based School Construction programme. It shall be responsible for:

- Preparation of the motivation to engage a design and construction supervision consulting firm to review and update the construction designs and drawings for classrooms, latrines, and other associated structures, and to supervise the construction works. These designs have to be cognizant of the need for provisions to avoid negative environmental impact and also mitigate the likelihood of negative social impacts.
- Support and ensure that there is an ESMP Training and Capacity Building plan for all the sites and that the training activity is a pre-requisite for school construction in any form. This will include making sure that there is a training plan in place developed by the firm and that the firm has also developed training manuals which will also be reviewed by the EFU.
- Ensure procurement and delivery of dust-bins and first aid kits at the sites
- Preparation of the Terms of Reference for such a design and construction supervision consulting firm. The EFU will ensure that the ToRs developed include as part of key requirements, provision of Environmental and Social impacts mitigation plan/strategy.
- Supervision of the selected consulting firm on the management of ESMP activities as well as reporting.
- Confirmation of the scope of construction works for each of the selected schools including adherence to Environmental and Social Impact Management Plan for each school.
- Reviewing and approving the rates recommended by the Consultant for payments to the artisans, labourers, watchmen, transporters of locally available materials, and any other pertinent service providers.

6.7.4 Consultant:

The Consultant shall be a consulting firm or association of consultants in the construction industry with the following skills mix:

- Architect
- Structural/Civil Engineer
- Services Engineer
- Quantity Surveyor
- Land Surveyor
- **Environmental and Social Specialist** to ensure the compliance of the social measures, including in the ESMP, during the project implementation. This specialist will work close to the Construction Community Committees (CCC) and Construction Team (CCT) in case of any complaints.

This Consultant shall be engaged through a competitive and transparent procurement process as stipulated elsewhere in this manual.

The main tasks of the Consultant shall amongst others include:

- To review, update and improve the designs, drawings and specifications utilized by the EFU for construction of classrooms, latrines, and other associated works.
- To develop Environmental and Social Impact checklist to be utilized at each site.
- To develop acceptable markets labour rates for mining or assembling or collecting locally available materials such as rubble stones, sand, hard-core and water for building purposes for each site.
- To closely supervise the construction works by deploying an appropriately qualified Clerk of Works at each site who shall: (i) monitor the works daily, and (ii) provide support to the Community Construction Committees (CCC) and Community Construction Team (CCT) as necessary.
- To conduct the monthly site meetings and submit formal progress reports to the Client, reflective work progress on site including challenges that may be occurring or encountered.
- Explore the possibility of parameter fencing around the school and the possibility as well of engaging the services of security personnel for night time surveillance. This can also be explored with other options that may be easily viable.

6.7.5 Procurement Unit (PU):

With the technical support from the Procurement Specialist, this unit is tasked with the responsibility of handling all the procurement activities of the LIEP in accordance with the rules and regulations stipulated in the Financing Agreement and other project supporting documents. For the Community Based School Construction, PU's responsibilities are summarized thus:

- Ensure Environmental & Social specifications in all construction contracts
- Carry out due processes to enable contract award and compilation of the contract(s).
- Management of the supplier(s) contract(s) and keeping auditable construction materials inventory and all pertinent procurement documents for each site.
- Ensure that recruitment of the CCT by the CCC (assisted by the Consultant and EFU) is carried out transparently.

6.7.6 Project Facilitation Unit (PFU):

Consisting of the Project Coordinator, Project Officer, M & E Specialist, Finance Manager, and Procurement Specialist, and notwithstanding the respective duties of these individuals, the PFU shall within the context of the existing project implementation arrangements, continue to support and strengthen the Ministry's implementation capacity in the areas of Coordination, Financial management, Monitoring and Evaluation and Procurement.

The M&E Specialist within the PIU is the focal point for environmental and social safeguard related issues and assures the compliance of the national law and the World Bank's safeguard policies.

6.7.7 PFU Finance Department:

The Finance Department under the management of Finance Manager shall be responsible for all financial aspects concerning the Community Based School Construction. This also includes the monitoring and management of use of funds allocated to the implementation of the ESMP. It is the report from the Finance department that will provide feedback on the efficiency of the project in as far as the implementation of the ESMP is concerned.

6.8 THE COMMUNITY BASED SCHOOL CONSTRUCTION

Community Based School Construction (CBSC) implementation will be aligned to the project – wide implementation framework and arrangements outlined in the Project Implementation Manual (PIM). Under the PIM framework, MoET departments are in charge of implementation of the respective components or subcomponents, under overall project oversight responsibility of the Department of Planning supported by the Project Facilitation Unit (PFU) in the areas of coordination, financial, procurement and M&E.

In line with the said framework, while there may be several stakeholders in the Community Based School Construction endeavour, EFU shall, as the department responsible for overall construction, lead the new component under which CBSC shall be undertaken. Director EFU shall therefore be the Component Manager, while Senior Quantity Surveyor shall be the focal person for CBSC at EFU.

EFU, Inspectorate, Technical firm are the key units/sections/departments/entities, with their respective roles for implementation of the CBSC highlighted below:

6.9 INSPECTORATE DEPARTMENT

Within the context of its overall schools' supervision role, the Inspectorate shall be responsible for oversight function on the activities undertaken by amongst others, the school Boards at schools' level. Inspectorate will provide linkage between EFU and the School boards and other stakeholders including Projects Facilitation Unit. The Inspectorate will therefore play a central coordination role of harmonizing the technical aspect of the project with the soft issues of operation. This therefore will allow for the School boards to be in a position to monitor and report on progress on environment and social impact mitigation from a layman's perspective

6.10 COMMUNITY CONSTRUCTION COMMITTEE (CCC):

Community Construction Committees (CCC) shall be established to implement Construction activities under the guidance of Education Facilities Unit (EFU)⁸ and the technical supervision firm. The committee shall be the School Board established under Education Act of 2010 as the school governing body shall assume the role of a Community Construction Committee. This is the committee that plays a key role for Community Based School Construction approach to be successful, as it is constituted by the people who are familiar and conversant with the challenges facing their communities in their respective areas. For the Community Based School Construction, the main duties of the CCC shall be to amongst others:

- Transparently identify and assemble members of the Community Construction Team (CCT) in numbers and calibre prescribed by the Consultant and approved by EFU.
- Ensure that the construction site is appropriately demarcated and secured so that it is not accessible by the school children, teachers, and any other persons not involved with construction works.
- Provide shelter, safety and security for the construction materials and equipment on site at all times.
- Always monitor CCT through the foreman and with the assistance of the Consultant's Clerk of Works. Any issues that arise will be recorded and reported with the intent to ensure corrective action and further report on the corrective action.
- Assist EFU in monitoring the Consultant's Clerk of Works on site.
- Partake in the piloting of Mobile monitoring, which is an SMS based activity monitoring of school level activities.
- Identify environmental and social issues that could derail the project and support project impacts and mitigation measures, awareness campaigns

6.10.1 Community Construction Team (CCT):

This is the team of artisans and labourers that shall be identified and appointed by the CCC with the assistance of EFU and the Consultant for each site. As a minimum, the team shall consist of:

- Bricklayer
- Steel-fixer
- Carpenter
- Labourers

The Community Construction team shall sensitize communities and implement a clearly defined labour recruitment strategy guided by the EFU, Inspectorate and the Consultant.

⁸ The Education Facilities is responsible for School construction by the Ministry of Education, their role includes among others, supervision of actual works, certification of completion of works and they are also the custodians of the designs.

The required calibre and numbers per each category per site shall be prescribed by the Consultant and approved by EFU. Broadly, the responsibilities that are related to the ESMP by the CCT shall be to:

- Sensitize communities and implement a clearly defined labour recruitment strategy once briefed by the EFU, Inspectorate and the Consultant.
- Assist the CCC to ensure that the site is appropriately secured from access by the people not involved in the construction works.
- Undertake site clearance where the buildings are to be erected in accordance with the site plan.
- Agree on protocols to be followed with the Consultant's Clerk of Works for construction works supervision purposes.
- Assist CCC for maintaining building materials and equipment inventory as well as keeping records of all the documentation concerning construction on site.
- Ensure that any excavations or pits are covered. Banners, posters & advertising
- Prepare site-specific plans based on the ESMF/ESMP
- Adhering to the environmental and social requirements laid out in the ESMF/ESMP
- Ensure that their staff are trained on E&S requirements
- Rehabilitate and restore work areas to agreed conditions upon completion of works.

6.10.2 The Appraisal and Approval of the Environment and Social Management Framework

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 the 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 implementer, 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 safeguard's 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 it to the Environment Department head office when satisfied that all documentation is in place.

Generally, all the sub-projects that will be financed by LEIP 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.

6.11 CAPACITY BUILDING NEEDS AND TARGET

The ESMP would also include a detailed capacity building/training for all role-players and for the 20 school sites.

Here below is a breakdown of the proposed training and cost implications. Details of the capacity building plan are contained below:

CAPACITY NEEDS	PARTICIPANTS	SUBJECT	RESOURCE PERSON	DURATION	COST (Loti)
Environmental and Social Management in Projects	Construction supervision firm, EFU, PU, PFU, M&E, School boards representatives	project cycle and Environmental checklist (see appendix 1) process	Environment Management Consultant	1 day	
WB safeguard policies and guidelines	Construction supervision firm, EFU, PU, PFU, M&E, School boards representative	Principles and Application of OP 4.01 and OP 4.12	Environment Management Consultant	1 day	
Sanitation and Hygiene	Construction supervision firm, EFU	Preparation and Implementation of Waste Management	Environment Management Consultant	1 day	
Total (Capacity Building)					407, 514

7. TRAINING AND CAPACITY BUILDING

In order to ensure 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:

7.1 COMMUNITY AND DISTRICT (LOCAL) LEVEL

The LEIP-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)⁹ to be able to identify and mitigate the potential environmental and social impacts of implementing the LEIP. At the 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

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

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

7.2 ENVIRONMENTAL AND SOCIAL TRAINING OF STAKEHOLDERS

The proposed LEIP 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.

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

⁹ The environmental and social checklist (Appendix 1) will be used as the site-specific ESMF for these small sub-projects at each school. Instead of developing a fully-fledged site-specific ESMF, sub-projects will be required just to use appendix 1 and develop site-specific Checklist – ESMFs.

- 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 17: 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: <u>Dept of Environment OR PRIVATE CONSULTANT</u></p>	<p>Annually, job orientation is provided on the spot.</p> <p>In each District:</p> <ul style="list-style-type: none"> 10 members of the 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 sessions 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: <u>PRIVATE CONSULTANT OR MAFS</u></p>	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of the 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: 5 days</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 	<p>In each District:</p> <ul style="list-style-type: none"> 10 members of the District Education 	<p>@ \$ 1 500.00 per District for two sessions each, during the entire project period</p>

No.	TRAINING ACTIVITY	TARGET GROUP / TRAINER	MEANS OF VERIFICATION	COST ESTIMATES
		<ul style="list-style-type: none"> District Health Office Teams 	<ul style="list-style-type: none"> Office Team are trained. School heads?? 	Venue: The Homesteads/Farms Length: 5 days Cost : \$30 000.00
	TOTAL BUDGET			\$90,000.00

7.3 THE PROPOSED APPROACH FOR EXECUTING THE TRAINING ACTIVITIES

The LEIP 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 the 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.

8. THE FUNDING ARRANGEMENTS

8.1 FUNDING FOR THE ENVIRONMENTAL AND SOCIAL MANAGEMENT

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.

8.1.1 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.

Below in Table 13, is a summary of some of the mitigation and enhancement measures with cost implications.

Table 18: 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 an adequate situational assessment to determine different vulnerability dimensions. 	Stakeholder Participation/consultation exercises, including field visits to participating schools. Lump Sum for all Districts for 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

8.2 ENVIRONMENTAL AND SOCIAL TRAINING

Environmental and Social Training budget requirements are contained in Table 14 for the proposed training activities.

Table 19: 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 LEIP 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 the 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 sessions 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 the District Education Office Team are trained. 30 Community member's level <p>@ \$ 1 000.00 per District for one session each, during the entire project period)</p> <p>Venue: The Homesteads/farms Length: 5 days 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 the District Education Office Team are trained. All participating School heads. <p>@ \$ 1 000.00 per District for two sessions 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

8.3 THE ESMF IMPLEMENTATION COST SUMMARY

Table 15 reflects the ESMF Implementation budget summary.

Table 20: 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.

9. MONITORING, EVALUATION AND REVIEWS

9.1 THE MONITORING, EVALUATION AND REVIEWS BUDGET

Table 16 reflects Monitoring, Evaluation, Annual Reviews and Audits Cost Estimates.

Table 16: Monitoring, Evaluation, Annual Reviews and Audits

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

10. THE CONCLUSIONS AND RECOMMENDATIONS

The proposed LEIP has the potential to significantly improve the education system of Lesotho. LEIP 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 LEIP project is expected to have more positive than negative environmental and social impacts. The envisaged environmental and social impacts include the 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 of 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 LEIP.
- The recommended mitigation measures should be implemented to reduce any significant environmental and social impacts.

The ESMP presented in the study will be used to mitigate the impacts during and after the implementation of the LEIP. 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.

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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 LEIP

Name of Sub-Project Representative:
.....

Sub-project Name:
.....

Sub-project Address:
.....

.....
.....

Name of Extension Team Representative
.....

Address:
.....

ITEM	N/A	Applicable	In progress	Complete
Environment				
Preparatory phase				
Is a Copy of the ESMP available at the school as well as all data collection tools				
Has training on the ESMP been done?				
Relevant personnel been appointed?				
Drainage				
Is run-off from the camp site adequately controlled and mediated?				
Are pollutants from the camp site reaching the environment?				
Access Roads				
Are access roads properly constructed?				
is there any damage to any of the roads?				
Have public roads not been damaged by the construction vehicles?				
Solid waste management				
Is waste properly disposed of?				
Are there sufficient waste bins?				
Are the waste bins covered?				
is the waste collection area clearly marked and demarcated?				
is waste being disposed of/collected in an appropriate manner?				
Noise pollution				
Are standardized operating hours being adhered to?				
Have there been any complaints relating to noise?				
Dust Control				
is dust a problem?				
Have appropriate measures been undertaken to reduce dust problem?				
Are erodible material covered, either in storage or while in transit?				
Aesthetics				
is the site visually acceptable?				
Fauna				
Have there been any occurrences of rare or endangered species?				
How were the occurrences dealt with?				
Flora				
Have there been any occurrences of rare or endangered species?				

ITEM	N/A	Applicable	In progress	Complete
How were the occurrences dealt with?				
Has any existing or surrounding infrastructure been damaged?				
Archaeology/heritage				
Have any heritage remains been uncovered?				
How were the occurrences dealt with?				
Existing infrastructure				
Has any existing or surrounding infrastructure been damaged?				
Have any complaints from stakeholders and surrounding communities been received?				
Environmental Education and awareness				
Have staff been given EE and awareness training?				
Soil Erosion				
Has appropriate grass species been planted on affected areas?				
Record-keeping				
Has the responsibility matrix in the ESMP been updated?				
Has a photographic record of environmental management and environmental issues been kept?				
Have the key environmental performance indicators been updated?				
Occupational Health and Safety				
Health and safety Policy				
Is there a health and safety policy in place?				
Health and safety Plans				
Is there a health and safety plan developed by the contractor?				
Is the plan approved by the Client?				
Demolition: Preparatory Operations				
Has coordination with the relevant authorities been undertaken?				
Are public pedestrian protections been provided?				
Are there any hazardous materials encountered during site preparation?				
Has the hazardous waste material been disposed of properly?				
Site Access and Use				

ITEM	N/A	Applicable	In progress	Complete
Is access to the site controlled to limit unauthorized individuals?				
In cases of large project sites, have the sites been fenced?				
Is access to the existing buildings clear?				
Hazardous Materials				
Are all storage containers clearly marked?				
Are hazardous substances being stored in appropriate containers?				
Are safety and danger signs easily visible (for areas such as pits for latrine construction)?				
Is the hazardous substance control sheet up to date?				
Fire Protection/Life Safety				
Are there fire extinguishers on site?				
Are the fire extinguishers accessible and easy to use?				
Is open burning done on site?				
Is smoking allowed in buildings?				
Alcohol and substance abuse				
Have the staff been warned against substance abuse during working hours?				
Biological hazards				
Is liquid waste pre-treated before disposal?				
Ablutions				
Are portable toilets sufficiently secure and tied down?				
Are the toilets clean and hygienic?				
Is sufficient toilet paper available ?				
Is waste from ablutions being handled properly?				
Is grey water being disposed of correctly?				
Are the toilets within 100m of a natural water body or water course?				
Community Health and Safety				
Has Safety of children (learners) and general public/pedestrians been taken into account				
Is the signage clearly displayed?				
Is there a visitor's book?				
Public participation				
Is there a structure for engaging communities?				
Has there been any consultations with interested and affected parties?				
Is there a record of interaction/consultation?				

ITEM	N/A	Applicable	In progress	Complete
Have any complaints by the communities or stakeholders been received?				
If complaints have been received, have they been addressed?				
Have any claims for damages been submitted?				
If a damage claim has been submitted, has it been addressed and resolved?				
Gender				
Has the recruitment policy included equal opportunity clause?				
Are there ablution facilities for different gender groups?				
Are data disaggregated by gender?				

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.

APPENDIX 3: 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.

APPENDIX 4: 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.

APPENDIX 5: ENVIRONMENTAL AND SOCIAL STANDARDS (ESSs)

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 6: STAKEHOLDERS CONSULTATION AND PUBLIC DISCLOSURE

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 LEIP. The implementing team, the PFU, under the guidance of Ministry of Education and Training (MoET) has 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.

The Objective of Public Consultation Plan

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 LEIP with

- Status of implementation of the identified measures,
- A sense of the concerns, priorities, and aspirations of the MoET 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 LEIP on information received and steps to follow.

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.

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 12 is a matrix that will be used to identify the key stakeholders for each sub-project:

Table 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.

The Key Stakeholders

The key stakeholders to be continuously engaged includes all those listed in Table 5-2 below. The list in table 12 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 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 the 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"> World Vision Lesotho
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 LEIP 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 below gives a general overview of the types of information needs for various stakeholder groups.

Table Summary Overview of a Public Consultation Plan (PCP) for LEIP

STAKEHOLDERS	INFORMATION TO BE DISCLOSED	CONSULTATION MEANS
LEIP 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/LEIP 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

The Stakeholders Consultations

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.

LEIP 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.

Stakeholder Consultation Approach

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 below:

Table 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. 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.

Grievance Redress Mechanisms

The Definition of Grievance Redress Mechanisms

Any query, call for clarification, problems, concerns raised by individuals or groups related to activities undertaken or processes applied by the project. These when addressed are expected to ensure support, results and sustainability of project activities. The goal is to create an avenue to prevent and address potential adverse environmental and social impacts emanating from project activities.

Grievance Redress Mechanism

Implementation of sub-projects activities under LEIP 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 LEIP. 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.
- To amicably resolve grievances raised by Aggrieved Parties (APs) during project implementation.
- To ensure successful and timely completion of projects, without creating adverse environmental, social and health conditions on the community.

The Scope of Grievance Redress Mechanism

The grievance mechanism applies to all project activities to be financed by the project activities. It includes issues related to environmental, involuntary resettlement and social issues in that it come up during project implementation.

The scale and scope of potential resettlement impacts of the LEIP is minimal, and the pre-screening to be conducted by the MoET on site selection anticipate potential negative social impact. However, regardless of the scale and scope of involuntary resettlement of the LEIP, it will inevitably give rise to grievances among the affected population over general issues related to the project (including broader social and

environmental). Timely redress of such grievances is vital to the satisfactory implementation of land acquisition and to the completion of the project on schedule.

The Project Management Team and the District Education Oversight Committee (DEOC) will install a Grievance Mechanism that will allow project-affected persons who have any project related issues in affected communities. The GRM will ensure that procedures to lodge a complaint, provide feedback on the project and that grievances are addressed in a timely and satisfactory manner. The office of the District Physical Planning Officer will be the designated point, and the Planning Officer and his deputy will be the responsible officers. A complaint form will be available for any aggrieved person(s), who will be assisted to complete the complaint form in copy, sign and submit a copy to the office. (S)he will keep the other for reference. The DEOC will receive and review all complaint forms. Arbitration shall be an option for grievance redress, as per the Arbitration Act, 1980 and aggrieved persons shall be allowed to name up to a maximum of two arbiters from the community to join the DEOC in addressing disputes.

Should an aggrieved person not have confidence in, or not be satisfied by the outcome of the arbitration process, (s)he reserves the right to take the matter up to a court of competent jurisdiction for redress. To facilitate this process, the GRM will be at three levels: community, district and national level. Even though the district level is likely to be the main recipient of complaints, provision has been made to spread access to the use of the mechanism to the community and the national level.

The Grievance Redress Committee

The following arrangements are outlined for the levels of grievance committees and the procedures to be followed. There shall be a grievance redress committee at the community, district and national levels as follows:

Community level

The Chief, Youth Leader, Women's Leader, Chairman of the PTA (where applicable), Member of the National Assembly, Member of the Local Council and an NGO known in the community will constitute the committee.

District level

The Planning Officer, District Engineer, District Education officer (DEO) Civil Society representative, District Security official will constitute the committee. Overall responsibility is on the DEOC.

National level

The Ministry of Education and Training, Ministry of Tourism, Environment and Culture, Project facilitation Unit, Ministry of Forestry, Range and Soil Conservation, Ministry of Local Government and Chieftainship Affairs.

Once constituted, each committee shall appoint/designate a registrar to handle the processing of complaints as detailed below. The Project Implementation Committee will have overall responsibility for coordination.

Grievance Redress Procedure

In general, affected people can lodge complaints at the district which should properly receive and document for onward action. In order to streamline the process, the following structure is proposed:

- i. Community Level: Complaints may be submitted to any member of the community level representatives which will be recorded/filed and discussed at an agreed date for possible resolution within 7 days upon receipt of such complaints. The community representatives will meet at the community level- to discuss and address issues and complainant informed of outcome of resolution.
- ii. If complaint is not resolved, then it is elevated to the level of the district level. The District Education Oversight Committee receives and convenes a meeting with all representatives to address complaint or resolve the issue. At this level, it is recommended that a representative of an NGO/CBO working in the community and in good standing should be invited as an independent witness. Maximum time for resolution should not exceed 14 days.
- iii. If issue is not resolved, then DEOC informs PIC who will inform the national committee for a final resolution which could take any time between 1-3 months.
- iv. Beyond this, the complainant has the option of seeking redress at the law courts if not satisfied with outcome of resolution.

APPENDIX 7: 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,

APPENDIX 8: LABOUR MANAGEMENT PROCEDURES

Labour Management Procedures

For the

Lesotho Education Improvement Project (LEIP)

EXECUTIVE SUMMARY

The Labour Management Procedures (LMP) is developed to manage risks under the **Lesotho Education Improvement Project (LEIP)** implemented by the Ministry of Education and Training (MoET) 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.

INTRODUCTION

This Labour Management Procedures (LMP) was developed by the Lesotho Ministry of Education and Training (MoET) to manage risks under the **Lesotho Education**

Improvement (LEIP) 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 LEIP 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.

OVERVIEW OF LABOUR ON THE LEIP PROJECT

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

- People employed or engaged directly by LEIP 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 LEIP's primary suppliers,

Labour Requirements

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 LEIP.

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 LEIP 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

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.

Primary Supply Workers:

Based on the requirement in every component primary supply worker 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.

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.

Labour Influx

It is not expected that there will be any labour influx in any project community. The LEIP 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.

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.

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.

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 LEIP.

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

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. Its 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.

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.

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.

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 ensure 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.

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 rights of the Child including 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.

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.

RESPONSIBLE STAFF AND PROCEDURES

The Ministry of Education and Training (MoET) project Facilitation Units (PFU) will have the overall responsibility to oversee all aspects of the implementation of the LEIP, 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 MoET and will address all LEIP 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.

Occupational Health and Safety.

The LEIP Environmental Specialist must ensure that the implementation of LEIP will be conducted in compliance to occupational health and safety requirements. The LEIP 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 LEIP.

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.

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.

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.

Worker Grievances.

The MoET's procedures currently in place will remain for the 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.

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 the 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.

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 for potential bidders to be aware of environmental and social performance requirements that will be expected from them and can 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 project's 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.

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 the 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 Sesotho.

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.

Occupational, Health and Safety

LEIP 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 LEIP with emphasis on individual OH&S responsibilities.
- Availing this policy statement to all interested parties at all participating educational facilities and institutions.

The LEIP 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 the 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 LEIP 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, labourers and daily workers attending to the site installations and safety of citizens for each sub-project site, as mandatory measures.

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 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.

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.

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 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.

DISCIPLINARY PROCEDURES AND GRIEVANCE MECHANISM

In any working environment both employers and employees need 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)

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.

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.

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.

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.

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

COMMUNITY WORKERS

(There will be no provision for Community Workers.)

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 9: TEMPLATE FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Name of Sub-project.....		Address		
Description.....				
Environmental and Social Elements	Impacts	Proposed measures ¹¹	mitigation Institutional responsibility for mitigation	Cost mitigation activities ¹² of
Construction period				
Physical Environment				
Increased generation of hazardous waste, like old batteries	Pollution of soils, and water			
Increased generation of solid wastes from solar panels.	Pollution of the environment			
Increased generation of 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 			
Pollution of water sources	<ul style="list-style-type: none"> • Pollution of water sources – quality of water 			
Social Environment				
Targeting:	<ul style="list-style-type: none"> • Conflict within communities • Perpetuating gender inequalities 			

no clear selection criteria of project beneficiary areas				
Poor Project Inception, Anxiety and Anticipation	<ul style="list-style-type: none"> Anxiety and anticipation Limited cooperation Suspicion and hence concealing important 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 10: TEMPLATE FOR ENVIRONMENTAL AND SOCIAL 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		
	Adequacy of Stakeholder Participation	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 11: 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 20. 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.

Impact Magnitude Scoring Table. (Adapted from Edwards R, 2011)

Criteria	Scoring	Description
Quality		Nature of Environmental Change
Positive	N/A	Beneficial impacts
Negative	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.

Criteria	Scoring	Description
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 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 12: SOLID, HAZARDOUS AND E-WASTE MANAGEMENT PLAN



THE KINGDOM OF LESOTHO

SOLID, HAZARDOUS AND E-WASTE MANAGEMENT PLAN

LESOTHO EDUCATION IMPROVEMENT PROJECT (LEIP)

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 LEIP 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 LEIP 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 21 provides an overview of the potential wastes, their classification, and avenues of disposal.

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 find, 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 LEIP 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

LEIP will follow industry best practice guidelines in handling e-waste, 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.

6.0 LEIP'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 instructions 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 where applicable.

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

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 waste being produced.

7.0 MONITORING

GoL is committed to minimising the risks associated with the generation of waste in the operation of the LEIP. The monitoring of the quantity and types of wastes being generated by the LEIP 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 13: 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 has no 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 behaviours 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. Notably, 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 favours, 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:

- SEA - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion,
- Workplace sexual harassment* - unwanted sexual advances; requests for sexual favours, sexual physical contact,
- Human trafficking* - sexual slavery, coerced transactional sex, illegal transnational people movement; and
- 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 a 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 favours 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 favours, 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 prescribe 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 22

Template of a Referral Mechanism

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: <ul style="list-style-type: none">* Arrest perpetrator – Police,* Gather evidence and complete file for case,* Inform survivor and witnesses on court hearing,* Provide physical protection/safe shelter. SERVICES: <ul style="list-style-type: none">* 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: *Livelihoodprogram, 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 centre/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 behaviour 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 MoET 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 MoET 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, counselling, 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 centres 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 re-entry 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 centre 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.