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**Harmonizing and Improving Statistics in West
and Central Africa Project-Series of Projects One
(HISWACA-SOP1) (P178497)**

**Environmental and Social Management Plan
(ESMP)**

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Table of Contents

EXECUTIVE SUMMARY	5
1 INTRODUCTION	11
1.1 Purpose of the ESMP.....	11
2 PROJECT DESCRIPTION	13
2.1 Description of Sub-project Activities.....	16
3 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK.....	18
3.1 The National Policy Framework	18
3.2 Acts and Regulations.....	18
3.3 International and Regional Treaties ratified by The Gambia that are most relevant to this Project include:	20
3.4 Institutional Framework.....	22
3.5 World Bank Environmental and Social Framework.....	23
4 ENVIRONMENTAL AND SOCIAL BASELINE.....	29
4.1 The Physical Environment	29
4.2 The Biological Environment.....	30
4.3 The Socio-Economic Baseline.....	31
5 PUBLIC CONSULTATION	36
5.1 Overview	36
5.2 Objectives of consultation	37
5.3 Methodological Approach.....	37
5.4 Feedback from Stakeholders.....	38
6 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND RISKS AND MITIGATION MEASURES .	41
6.1 Methodological Approach.....	41
6.2 Evaluating the Significance of Potential Impacts	42
6.3 Evaluation of Impact Severity / Significance	43
6.4 Positive Environmental and Social Impacts.....	43
6.5 Negative Environmental and Social impacts and Mitigation Measures.....	43
7 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN.....	53
7.1 ESMP Implementation and Monitoring Arrangements	53
7.2 Reporting.....	62
7.3 Capacity Development	62
7.4 Environmental and Social Auditing	63
7.5 Budget for Implementation of the ESMP	64
7.6 Integration of the ESMP	67
8 CONCLUSION.....	68

8.1 Recommendations	68
ANNEXES	69
Annex 1: Labor Grievance Mechanism	70
Annex A: Code of Conduct	79
Annex B: Response Protocol for SEA/SH Complaints	88
Annex C: Grievance Log (for non-SEA/SH complaints).....	93
Annex D: Intake Form.....	94
Annex 2: The list of community representatives consulted.....	97
Annex 3: Terms of Reference (TOR)	98
Annex 4: Waste Management Plan.....	104

Abbreviations/Acronyms

C-ESMP	Contractor's Environmental and Social Management Plan
COVID-19	Coronavirus Disease 2019
ESIA	Environmental and Social Impact Assessment
ESF	Environmental and Social Framework
ESHS	Environment and Social Health and Safety
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GBoS	Gambia Bureau of Statistics
GFP	Grievance Focal Point
GoTG	Government of The Gambia
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
HR	Human Resources
HSP	Health and Safety Plan
LMP	Labor Management Procedures
NEA	National Environment Agency
NEMA	National Environment Management Act
NSO	National Statistics Office
NSS	National Statistical System
OHS	Occupational Health and Safety
PAP	Project Affected People
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PS	Procurement Specialist
SEA/SH	Sexual Exploitation and Abuse/SH
SEP	Stakeholder Engagement Plan
SSS	Social Safeguards Specialist
VAC	Violence Against Children
WB	World Bank

EXECUTIVE SUMMARY

This report is the Environmental and Social Management Plan (ESMP) of the Harmonizing and Improving Statistics in West and Central Africa Series of Projects 1 (HISWACA-SOP1). The availability of good-quality data and statistics in Western and Central Africa is critical for informing policies to support adaptation to and mitigation of risks and to foster sustainable and equitable economic growth. During the past two decades, considerable efforts and resources were deployed to help improve statistical capacity in Sub-Saharan Africa to close gaps in financing, source data production, periodicity, and timeliness. Responding to the national and international policy demands for more and better-quality data, HISWACA-SOP1 will support 8 countries and 4 regional institutions in the west and central Africa region to fill the data production gap. The Project Development Objective (PDO) is to improve country statistical performance, regional harmonization, data access and use and to enhance the modernization of the statistical system in West and Central Africa. The key aspects of the PDO are the improvements of (a) the statistical performance of the National Statistical Systems (NSS), (b) harmonization of statistics, (c) data access and use, and (d) modernization of National Statistics Offices (NSOs). The project consists of four components, namely: (i) *Harmonization and Production of Core statistics Using Harmonized Methodologies*; (ii) *Supporting Statistical Modernization of Participating Countries' NSOs*; (iii) *Support Physical Infrastructure upgrading and Modernization*; and (iv) *Support Project Management, Monitoring, and Evaluation*

As part of the project activities, the current Gambia Bureau of Statistics (GBoS) office complex located in the Kanifing Industrial Layout, will be rehabilitated with an extra layer of structure added on top to make it a three-storey building.

The Gambia Bureau of Statistics (GBoS) will be the implementing agency of the project through a PIU that will be established within GBoS and charged with the responsibility of implementing the activities of the project. GBoS will be responsible for the fiduciary aspects of the project. Implementation of this ESMP is the responsibility of the GBoS and the PIU. However, mitigation measures with respect to civil works activities will be the responsibility of the contractor, and the PIU and GBoS will monitor and supervise. Activities will mainly focus on improving data harmonization, data sources, access, dissemination and use.

According to the World Bank Environmental and Social risk classification, the HISWACA-SOP1 is a moderate risk project with respect to potential environmental and social impacts which means the potential negative environmental and social impacts have known mitigation measures which can be effective. The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant; they are predictable and expected to be temporary and/or reversible, low in magnitude, and site-specific, without likelihood of impacts beyond the actual footprint of the project. An umbrella-ESMF was prepared to address potential risks and impacts, screening methodologies, and mitigation measures. The objective of this ESMP is to assess and mitigate potential negative environment and social (E&S) risks and impacts consistent with the Environmental and Social Standards of the World Bank and the national regulation. The plan also includes the procedure and organizational and reporting system for its implementation.

The effective implementation and monitoring of the ESMP will require capacity building of the project staff which is ongoing with support from World Bank environmental and social specialists.

The aim of this ESMP is mostly to help mitigate and manage likely social and environmental risks and impacts during execution of the construction and provision of furniture and equipment. To achieve this aim, firm commitment for the implementation and monitoring of this plan, from the major stakeholders will be required during all phases of the project.

Description of the Project

The World Bank interventions under the HISWACA-SOP1 are articulated in 4 Components:

Component 1: produce harmonized tools (classifications, methodologies, etc.) at the continental and sub-regional levels and support the production of core statistics using the previous harmonized tools.

Component 2: supports statistical modernization, institutional reforms, improve data access, dissemination, and use, and human resources development.

Component 3: support the construction of a new building or rehabilitation of physical and Information and Communication Technology (ICT) infrastructure for NSOs and schools of statistics.

This ESMP falls under this component where activities will include the rehabilitation of the existing Gambia Bureau of Statistics (GBoS) Office complex with an extra layer of structure added on top to make it a 3-storey building.

Component 4: support the project's management and monitoring/evaluation.

Policy, Legal and Institutional Framework

The National Policy Framework

Policies

- National Youth Policy (2009 – 2018)
- Gambia Environment Action Plan, GEAP (2009-2018)
- National Health Policy (2012-2020)
- Gambia National Gender & Women Empowerment Policy (2010– 2020)
- National Strategic Environmental Assessment Policy (2017- 2021)
- National Development Plan (2018-2021)

Acts and Regulations

- Statistics Act, 2005
- Labor Act, 2007
- National Environment Management Act, NEMA, 1994
- Environmental Discharge (Permitting) Regulations 2001
- Environmental Quality Standards Regulations 1999
- Environmental Impact Assessment Regulations, 2014
- The Anti-littering Regulations, 2007
- Public Health Act, 1990
- The Children's Act, 2005
- Sexual Offences Act, 2013
- The Women's Act 2010

International and regional treaties ratified by The Gambia that are most relevant to this project include:

- UN Framework Convention on Climate Change (UNFCCC) 1994

- African Charter on Human and People’s Rights (ACHPR) (1983) and Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018
- Convention on the Rights of the Child (CRC), August 1990
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1993
- Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (CMW), 2017
- International Covenant on Economic, Social and Cultural Rights (ICESCR), 1976

Relevant institutions to be involved in the implementation and monitoring of the ESMP are:

- Gambia Bureau of Statistics (GBoS)
- PIU (GBoS)
- Ministry of Finance and Economic Affairs (MoFEA)
- Ministry of Health
- Ministry of Gender, Children and Social Welfare (MoGCSW) - Women’s Bureau and Department of Social Welfare
- National Environment Agency (NEA)
- Ministry of Environment, Climate Change and Natural Resources (MECCNAR)
- Kanifing Municipal Council (KMC)

World Bank Environmental and Social Standards that are relevant to the Project include:

- i. **Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Impacts and Risks** -.Provides structured processes or procedures for project categorization, assessing and evaluating project environmental and social risks and impacts, as well as management of same (mitigation hierarchy). It establishes the basis for categorizing projects based on the borrower’s capacity to manage and monitor environmental and social risks/impacts as well as the implementation of mitigation measures, socio-political context, scale of the undertaken as well as spatial extent and significance of anticipated impacts and Risks
- ii. **Environmental and Social Standard 2 (ESS2): Labor and Working Conditions** - It is to ensure a safe, healthy and conducive working environment for workers and ensure that the environment is free of forced and child labor as well as other forms of intimidation, discrimination and harassment.
- iii. **Environmental and Social Standard 3(ESS3): Resource Efficiency and Pollution Prevention and Management** - promotes sustainable resource utilization, avoiding and/or minimizing project pollution, generation of hazardous and non-hazardous waste and project-related emissions.
- iv. **Environmental and Social Standard 4 (ESS4): Community Health and Safety** - The objective of this standard is to anticipate, avoid and/or mitigate adverse project impacts on beneficiary communities as well as safeguard project-affected communities from traffic and road safety risks, diseases and hazardous materials as well as SEA/SH risks associated with project implementation and operation.

- v. **Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure** - establishes a systematic approach to stakeholder engagement while ensuring that appropriate information on project risks and impacts is provided to stakeholders in a timely, comprehensive, accessible, and appropriate manner.

Institutional Framework

The institutional framework relevant to the implementation of this Project includes the following:

- i. **National Environment Agency (NEA):** The NEA enforces the NEMA, 1994 and EIA Regulations 2014, and reviews the ESIA report to grant Environmental Approval for the Project
- ii. **Ministry of Finance and Economic Affairs (MoFEA):** MoFEA Oversees Project Implementation of World Bank Policies and law of The Gambia.
- iii. **Gambia Bureau of Statistics (GBoS):** Project Proponent and will lead implementation the ESMP.
- iv. **Projects Coordination Unit (PIU)**The PIU will be established within GBoS to support in the Coordination of the project implementation process.
- v. **Ministry of Environment, Climate Change and Natural Resources (MECCNR):** Oversees the NEA and implementation of environmental laws and policies of The Gambia.
- vi. **Ministry of Health:** Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development.
- vii. **Women's Bureau-**Under the Ministry of Women, Children and Social Welfare, specifically promotes gender equity and women's empowerment in The Gambia. It ensures the rights of women affected by the Project are protected; participates in sensitization on gender issues during pre-rehabilitation, rehabilitation, and operation phases.
- viii. **Department of Labor:** Protection of employee rights; Protection against child labor; Response to complaints and reports such as accidents, abuse, and discrimination at work.
- ix. **Department of Social Welfare:** Protects and promotes the rights of vulnerable people such as children, women and the disabled; supports and guides the process during related grievances; participates in sensitization on GBV, SEA, SH, VAC, etc.

Environmental and Social Baseline

This section describes the general environmental and social baseline conditions of the Kanifing Municipality, where the Project will be implemented.

Kanifing Municipality is a multi-ethnic society exhibiting a high degree of ethnic and religious tolerance and diversity. The main ethnic groups are the Mandinka, Wollof, Fula, Jola, Manjago, aku, Serer and Sarahule groups. The Mandinkas constitute most of Kanifing Municipality's population, followed by the Jola and Wollof groups.

The Physical Environment

The climatic condition in Kanifing Municipality is of the Sudano-Sahelian type and is characterized by the occurrence of two distinct seasons: a hot rainy season from May/June to October, and a dry season from November to May with rare occurrence of rainfall in May and October.

The soil profile on site is fine textured and mostly silt with little amount of clay.

The Biological Environment

The site has no significant plants or animal species which might be affected.

Socio- Economic Baseline

In 2015, 46.6 percent of Gambians lived below the poverty line. Most of the poor people are living in the urban areas which contributed to half of the Gambia's population who live in absolute poverty. Even though poverty rates are high in the country's interior compared to its coastal urban areas, the poor population, in absolute numbers, is highest around the capital area. This rapid urbanization over the last few decades is triggered by high rural-to-urban migration led by poor people, often youth, to amass in and around congested urban areas where inequality is high, traditional support systems are typically weak, and women face barriers in labor market participation. This situation gives rise to new forms of social risks, including those related to crime, violence, and social unrest, as well as traffic/community health and safety risks. Given increase in population, it could also increase the risk for community expectations for opportunities for employment through the project, especially those related during rehabilitation activities.

Environment and Social Components likely to be affected by the Project

Physical	Human
<ul style="list-style-type: none">• Noise• Air quality• Soil/land• Solid and hazardous waste management	<ul style="list-style-type: none">• Public and workers' health and safety• Labor-related issues• Vulnerable groups (People with disabilities, vendors including women and old people)

Potential Environmental and Social Impacts and Risks

Upon completion of the Environmental and Social Assessment, the Project was classified as moderate risk meaning no adverse significant environmental and social impacts is envisaged from the implementation of activities. The purpose of the screening was to: (i) determine whether activities are likely to have potential negative environmental and social risks and impacts; (ii) identify appropriate mitigation measures for activities with adverse risks or impacts; and (iii) incorporate mitigation measures into implementation of the activity.

Potential Impacts and Risks of the Project on the Environment and the Social aspect

Environmental Risks and impacts	Social Risks and impacts
<ul style="list-style-type: none"> • Interruption of drainage systems • Generation of all manner of solid and liquid wastes. • Noise and Vibration during civil works. • Air Quality Deterioration (Dust Pollution) • Waste dumping • Damage to infrastructure and public utilities. • Improved working environment for GBoS staff. • Occupational health and safety risks 	<ul style="list-style-type: none"> • Violence Against Children (VAC). • SEA/SH from workers coming from outside GBOS. • Discrimination in the recruitment of workers. • Risks of non-payment for services rendered by workers to the contractor. • Risks of child labor when children below the minimum age for employment are used as temporary replacements for workers. • Temporary employment and income-earning opportunities for workers.

Environmental and Social Management Plan (ESMP)

The potential impacts and mitigation measures identified for all the various activities are further expanded in an ESMP matrix (in chapter 7). For ease of reference during implementation, each mitigation activity includes the responsible party:

- responsibilities for impact and risk mitigation (Contractor, GBoS, PIU, Communities etc.)
- duration of expected mitigation measures (before, during or after the specific Project activity)
- responsibilities for monitoring (NEA, PIU, GBoS, etc.)
- required budget for mitigation to ensure resources are available in a timely manner.

Roles and Responsibilities for ESMP Implementation

The Gambia Bureau of Statistics (GBoS) will be the implementing agency of the project through a PIU that will be established within GBoS and charged with the responsibility of implementing the activities of the project. GBoS will be responsible for the fiduciary aspects of the project. Implementation of this ESMP is the responsibility of the GBoS and the PIU. However, mitigation measures with respect to civil works activities will be the responsibility of the contractor, and the PIU and GBoS will monitor and supervise. GM operation is the responsibility of the PIU.

During the implementation of the Sub-project, the Contractor will prepare a Contractor's Environmental and Social Management Plan (C-ESMP) along with the OHS implementation plan upon mobilization, which will be reviewed and approved by the PIU. The Contractor will also have a qualified environment/OHS specialist to implement the ESMP and social specialist. The Supervision Engineer will be responsible for overseeing the implementation of ESMP and issuing non-compliance notice to the contractor in the event of non-compliance.

The PIU and GBoS will be responsible for follow-up, and to ensure that the ESMP is fully implemented with the support of the Environmental Safeguards Specialist (ESS) and Social Safeguards Specialist (SSS) who during field activities will work with the regional Community Liaison Officers (CLOs) to be recruited by GBoS. Environmental and social Clauses will be included in the bidding documents and in the Contractor and subcontractor's agreements that will ensure compliance and coordination with the GM, among others.

1 INTRODUCTION

The World Bank is financing the *Harmonizing and Improving Statistics in West and Central Africa* (HISWACA or the Project) to support countries in Western and Central Africa including The Gambia to improve the statistical performance of national and regional statistical systems, especially data sources and data infrastructure while ensuring that data produced are harmonized and made more comparable. This program will be implemented in two Series of Projects (SOP). SOP1 covers eight member countries in the Economic Community of West African States (ECOWAS) and three other regional institutions, African Union Institute for Statistics (STATAFRIC), Commission and West African Economic and Monetary Union (WAEMU Commission). Countries in SOP1 are Benin, Guinea, Guinea-Bissau, Mali, Mauritania, Niger, Senegal, and The Gambia. This Environmental and Social Management Plan (ESMP) covers only The Gambia.

The Project Development Objective (PDO) is to improve country statistical performance, regional harmonization, data access and use and to enhance the modernization of the statistical system in West and Central Africa. The key aspects of the PDO are the improvements of (a) the statistical performance of the National Statistical Systems (NSS), (b) harmonization of statistics, (c) data access and use, and (d) modernization of National Statistics Offices (NSOs).

As part of the project implementation process, the Gambia Bureau of Statistics (GBoS) will seize the opportunity provided by the HISWACA SOP1 to address their capacity gaps related to physical and Information and Communication Technology (ICT) infrastructure. These will include the rehabilitation and upgrade of the existing GBoS Office Building at the Kanifing Industrial Layout in Kanifing.

The project will be implemented by the Project Implementation Unit (PIU) of GBoS which will be set up prior to implementation of project activities. As this PIU would have had no previous experience with the World Bank's Environmental and Social Framework (ESF), environmental and social specialists including a GBV specialist will be hired so as to strengthen the institutional capacity.

1.1 Purpose of the ESMP

The objective of this ESMP is to assess and mitigate all potential negative environment and social (E&S) risks and impacts consistent with the Environmental and Social Standards (ESSs) 1, 2, 3, 4, 8 and 10 of the World Bank which are relevant to this sub-project.

Specific objectives of the ESMP are to: (a) Identify the roles and responsibilities of key Stakeholders; (b) Identify the eligible beneficiaries and persons affected; (c) assess the potential environmental and social risks and impacts of the rehabilitation activities of the Project and propose mitigation measures; (d) Identify the environmental social risks and impacts during implementation of these activities that the contractor will need to address in the Contractor's ESMP; (e) specify appropriate roles and responsibilities of those tasked with monitoring the implementation of the sub-project, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues, risks and impacts related to the activities; (f) identify the training and capacity building needed to successfully implement the provisions of the ESMP; (g) address mechanisms for public & stakeholder consultation and participation and disclosure of project documents as well as create an accessible and inclusive system of addressing possible grievances; (h) set up a timeline for the execution of the ESMP (i) establish the budget requirements for implementation of the ESMP and (j) identify the sources of funds for implementation of the ESMP.

The ESMP will provide principles, specific processes and technical guidance to the Project Implementation Unit (PIU), Gambia Bureau of Statistics (GBoS) and the consultant to assess the

environmental and social risks and impacts of the rehabilitation activities and the provision of the needed office furniture and equipment of the GBoS office complex under the project, including ensuring that individuals or groups who, because of their particular circumstances or conditions, may be disadvantaged or vulnerable, are adequately factored for during project implementation. This ESMP is connected to the Stakeholder Engagement Plan (SEP) and other specific plans (such as ESCP, ESMF, LMP, etc.) that have been prepared for the Project. This ESMP will be applied to the rehabilitation activities only. It must be complied with through the entire project cycle from design to implementation to attain the above outlined purpose and objectives. The ESMP will be a 'living' document and will be revised when necessary.

2 PROJECT DESCRIPTION

HISWACA-SOP1 aims to improve the statistical performance, harmonization, and data access and use of participating countries and regional bodies in West Africa (AFW) and to support the modernization of their statistical systems. The components of the project are as follows:

- 1. Harmonization and Production of Core statistics Using Harmonized Methodologies**
 - 1.1. Support Regional Coordination and Adoption of Harmonized Data Quality Standards
 - 1.2. Support Demographic and Socio-Economic Statistical Production
 - 1.3. Support Real and Fiscal Sector Statistical Production
 - 1.4. Support Agricultural and Climate Change Statistical Production
 - 1.5. Sectoral and Sub-National Administrative Data Curation
- 2. Supporting Statistical Modernization of Participating Countries' NSOs**
 - 2.1. Support Statistical Modernization of National Statistical Offices (NSOs)
 - 2.2. Support Institutional Reforms for Selected National Statistical Systems (NSSs)
 - 2.3. Enhance human capital Support
 - 2.4. Support Data Accessibility and Dissemination
 - 2.5. Support Data Use and Analysis to Inform Public Policy
- 3. Support Physical Infrastructure upgrading and Modernization**
 - 3.1. Support Construction and Infrastructure Upgrading of selected National Statistical Offices (NSOs) and Regional Statistical Schools
 - 3.2. Support Modernization of Information and Communications Technology (ICT) and Statistical Infrastructure of National Statistical Offices (NSOs) and Regional Statistical Schools.
- 4. Support Project Management, Monitoring, and Evaluation**

Component 1: Harmonization and Production of Core statistics Using Harmonized Methodologies

The first component is to produce harmonized tools (classifications, methodologies, etc.) at the continental and sub-regional levels and support the production of core statistics using the previous harmonized tools. Activities under this component aim to improve pillars 4 (data sources) and 5 (data infrastructure) of the Statistical Performance Index (SPI), where participating countries in the regions are doing poorly in terms of statistical performance. Indeed, while harmonization will help the adoption of international standards, the production of a core set of economic, social and demographic statistics is needed to meet users' demand for statistics. Activities implemented through this component will also be instrumental to ensuring performance of the National Statistical Systems (NSSs) regarding the availability of indicators required to monitor most of the Sustainable Development Goals (SDGs) (pillar 3 of the SPI). It comprises the following:

- a) **Subcomponent 1.1: Regional Coordination and Adoption of Harmonized Data Quality Standards** - Improved data comparability through harmonization at the regional and sub-regional levels:
 - support AU in monitoring the second Strategy for the Harmonization of Statistics in Africa (SHaSA2) initiative.
 - design and the adoption of harmonized standards in national accounts, Consumer Price Index (CPI), and household surveys.

- b) Sub-component 1.2: Demographic and Socio-Economic Statistical Production** - Support demographic and socio-economic statistics. The activities will include:
- The implementation of a core set of social statistics, including the demographic population census.
 - The implementation of household surveys in The Gambia.
 - Support The Gambia in the implementation of Demographic Health Survey/Multiple Indicator Cluster Survey (DHS/MICS).
 - Supporting The Gambia in building a system of labor statistics by financing labor force surveys.
- c) Subcomponent 1.3. Real and Fiscal Sector Statistical Production** - Enhance core economic statistics. The scope of economic statistics is wide; it involves enterprise statistics, national accounts, Consumer Price Index and other prices and production indices, external trade statistics, public finance statistics, etc. The proposed sets of activities will include:
- Support to implement a coherent system of enterprise statistics (business registers, administrative data, censuses, and surveys) in The Gambia.
 - Support to improve the quality of government finance statistics.
 - Support the modernization and rebasing of national accounts using international standards.
- d) Subcomponent 1.4. Agricultural and Climate Change Statistical Production** - Support agricultural and fishery statistics. The activities will include:
- Support to implement an integrated system of agricultural sample censuses and surveys. The project will support the improvement of annual agriculture surveys and the design and implementation of livestock data collection in The Gambia; and
 - Support other data collection activities as necessary, including supporting The Gambia to advance in the collection and production of a set of core climate change statistics and indicators relevant to the country and the region.
- e) Subcomponent 1.5. Sectoral and Sub-National Administrative Data Curation** - Support sectoral and geospatial statistics from administrative sources. The project will:
- Support to improve administrative data for health and education as well as other sectors, depending on the situation in The Gambia; and
 - Support to strengthen capacity of GBoS in the production of core statistics at the sub-national level.

Component 2. Supporting Statistical Modernization of Participating Countries' NSOs

The second component supports statistical modernization, institutional reforms, improve data access, dissemination, and use, and human resources development. This component aims to support NSOs of participating countries to prepare themselves in moving toward what the 2021 World Development Report (WDR) called an Integrated National Data System. It will also support institutional reforms. All the participating countries have a Statistics Act that underpins the collection, management, and dissemination of official statistics. These Statistics Acts align with the United Nations (UN) Fundamental Principles of Official Statistics and the African Charter on Statistics. In almost all these countries, the Statistics Acts provide for the NSO to be an autonomous agency of the Government with

its own governing board, which raises the profile of statistics, enhances the integrity and credibility of official statistics in the eyes of the public. However, most of the Statistics Acts lack provisions for sustainable funding of statistical activities. In this regard, the key principles of institutional reforms to be supported are to finance technical assistance to participating countries seeking to update their Statistics Act to include provisions for sustainable funding of statistical activities. The component also supports data access and dissemination, harmonized time series at the continental and sub-regional levels and time series and micro-data at the national level. Doing so will therefore improve their performance regarding data services (pillar 2 of the SPI). This second component also invests in human capital, academic training in statistics, and on-the-job staff training, when skills need improvement. This will help address the shortage of statisticians with expertise and skills in specialized areas faced by countries in both regions, such as national accounts, agricultural statistics, household surveys, trade statistics, financial statistics, and price statistics. The following are sub-components:

- a) **Subcomponent 2.1:** Statistical Modernization of National Statistical Offices (NSOs) - Support production of statistics using new data sources, including based on private intent data.
- b) **Subcomponent 2.2:** Institutional Reforms for Selected National Statistical Systems (NSSs) - Supporting institutional reforms for better coordination of the NSS and improving sustainable funding.
- c) **Subcomponent 2.3:** Enhance human capital Support - For those already working in the NSS, on-the-job training will be provided to enhance the knowledge of those already working and expose them to new emerging techniques and tools.
- d) **Subcomponent 2.4:** Data Accessibility and Dissemination - Improving data access and dissemination at national levels. This subcomponent is designed to address this issue to boost access and usage of existing statistics. The project will support the implementation of an open data system for archiving and distributing long -time series at the national level.
- e) **Subcomponent 2.5:** Data Use and Analysis to Inform Public Policy - Enhance the use of data to inform public policies. The project will focus on a set of activities to improve data use. First, the project will help the NSS with the establishment of tools that can be used for analytical work to inform policy decisions such as Social Accounting Matrix (SAM), BOOST, economic models, etc., and collaborate with the 50x2030 Initiative to provide technical assistance in strengthening statistical capacities.

Component 3: Support Physical Infrastructure upgrading and Modernization

The NSOs in the participating countries are the leading official statistical agencies within the NSS in data production which means that government will play a critical role to enable value creation in the data produced. They are a key factor in the productivity of any NSS institution and its performance. For example, power shortages and low internet bandwidth can severely limit productivity. Similarly, data statistical software such as SPSS, STATA, etc. are basic data manipulation tools (process of organizing information to make it readable and understandable) and allow data sharing and accessibility of statistical production. In many countries, these tools are not readily available, and some staff use their own private resources for official business. This component aims to strengthen the capacity of NSOs and statistical schools with the equipment and tools needed to adequately fulfill their mandates. Under this component, the project will support the construction of a new building or rehabilitation of physical and Information and Communication Technology (ICT) infrastructure for NSOs

and schools of statistics. Needs assessment will be conducted country-by-country with the NSO. For countries without a great structure, rebuilding will be the next step:

- a) **Subcomponent 3.1 Construction and Infrastructure Upgrading of selected National Statistical Offices (NSOs) and Regional Statistical Schools:** Under this activity, the project will support the modernization of the GBoS physical infrastructure by upgrading the office complex with modern facilities and providing needed office furniture and equipment for the entire statistical cycle from production through dissemination. Availability of requisite infrastructure is critical for the smooth functioning of the NSS and timely delivery of key statistical activities by GBoS. Light renovation and upgrades will be financed such as the following: i) Repairing leakages and cracks in the walls, tiling of walls and floors of the GBoS building; ii) Repainting where necessary; iii) Repartitioning offices to create space for activities such as a data center.
- b) **Subcomponent 3.2: Modernization of Information and Communications Technology (ICT) and Statistical Infrastructure of National Statistical Offices (NSOs) and Regional Statistical Schools.** Under this component, activities include upgrading IT systems, improving access to and use of innovative tools such as statistical software (including tools to conduct geospatial analysis), and increasing access to innovative practices through subscriptions to scientific journals. These activities aim to strengthen the reforms in digitization of data production and dissemination and to provide GBoS with the necessary training equipment to support the training of students and GBoS staff in CAPI and management of GIS. Ultimately, the NSS will be able to leverage economies of scale that come with increased digitalization through improved quality of data collection activities, and reduce time taken to provide statistical information available to end-users of the data.

Component 4: Project Management, Monitoring, and Evaluation

The goal of this component is to support the project's management and monitoring/evaluation. This component will also support regular user satisfaction surveys to measure how well the statistical products or services produced meet or exceed user expectations. Indeed, data users are the customers of statistical systems and are clearly the most important component of the NSS. Data is generated because there is demand from the users. In addition, some data users are responsible for providing resources. Therefore, it is important that users are satisfied with the scope, quality and timeliness of the data produced. Therefore, the result of these studies serves as a basis for continuous improvement and a more responsive NSS for end users.

2.1 Description of Sub-project Activities

This ESMP has been developed for infrastructure refurbishment and upgrade including provision of furniture and equipment under the HISWACA-SOP1 at the GBoS Office Complex at Kanifing industrial layout. The sub-project may generally have limited environmental and social risks because the site is an existing facility and the works are not major. The scope of the sub-project is to rehabilitate the existing building and review the initial design (as the building is fifteen years old) to assess the possibility of adding an extra layer of structure at the top in order to make it a 3-storey building as it is currently a 2-storey building. Table 2-1 below shows the different activities envisaged for the rehabilitation/construction activities.

Table 2-1 Description of Sub-Project Activities

Phase	Construction Activities
Pre- Rehabilitation/Construction Phase	Transportation and storage of materials; Removal of old flooring and doors including office partitions, chipping of cracked walls, removal of plumbing and electrical fittings and fixtures and scraping of walls to prepare for tiling or painting.
Rehabilitation/Construction Phase	Re-partitioning of offices, plastering of walls, erecting of super-structure, complete roofing of all the structures, electrical and plumbing installations, fixing of doors and windows, painting, wall and floor finishing.

3 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

3.1 The National Policy Framework

Policies

- National Youth Policy (2009 – 2018)
- Gambia Environment Action Plan, GEAP (2009-2018)
- National Health Policy (2012-2020)
- Gambia National Gender & Women Empowerment Policy (2010– 2020)
- National Strategic Environmental Assessment Policy (2017- 2021)
- National Development Plan (2018-2021)

Table 3-1: Relevant National Policies

Policy	Description	Relevance to the Project
National Youth Policy (2009–2018)	Policy aims to mainstream youth issues into the advancement of all sectors	Successful project implementation will encourage youth development by employing them in the projects' activities.
Gambia Environment Action Plan, GEAP (2009-2018)	Integrated environment and natural resources management	Provides guidance in general environmental planning and natural resources management
The National Health Policy, 2012-2020	Protects public and environmental health including nuisance and other risks associated with this Project	Relevant to this Project since pollution and nuisance risks can be associated with the project activities
Gambia National Gender & Women Empowerment Policy (2010–2020)	To mainstream gender in national and sectoral planning and programming to ensure equity and equality	Women must be consulted and involved in the local monitoring and evaluation process during project implementation
National Strategic Environmental Assessment Policy (2017- 2021)	Aims to ensure environmental sustainability	Applies when developing policies, plans or programs in all sectors, MoFEA
National Development Plan (2018-2021)	Policy proposes to increase the national coverage of data to ensure improve standard of statistical data system	Project is to support good measures to identified data gaps in GBoS and its Stakeholders.

3.2 Acts and Regulations

- Statistics Act, 2005
- Labor Act, 2007
- National Environment Management Act, NEMA, 1994
- Environmental Discharge (Permitting) Regulations 2001
- Environmental Quality Standards Regulations 1999

- Environmental Impact Assessment Regulations, 2014
- The Anti-littering Regulations, 2007
- Public Health Act, 1990
- The Children’s Act, 2005
- Sexual Offences Act, 2013
- The Women’s Act 2010

Table 3-2: The Legal Framework Relevant to the Project

TITLE OF ACT OR REGULATIONS	DESCRIPTION	RELEVANCE TO THE PROJECT
Public Health Act, 1990	Protects public and environmental health including abatement of nuisances and any condition that may be injurious to health.	Relevant to Project since pollution risk can be associated with the Project.
National Environment Management Act, 1994	Principal legislation in environmental management; Part V of Act provides for certain projects listed.	This Project falls under Schedule B.
Environmental Quality Standards Regulations 1999	Regulations declare standards set out in Schedule 1 in respect of ambient air, saline waters, surface fresh waters and groundwater.	Project implementation has potential to generate to pollute communities.
Environmental Discharge (Permitting) Regulations 2001	Regulations require that a permit be obtained for most discharges of potentially polluting liquids into or onto the ground (i.e., to groundwater) or into surface waters (such as rivers or streams).	Project implementation has potential to discharge potentially polluting liquids into the Project Affected Area.
The Children’s Act 2005	Act sets out the rights and responsibilities of children and provides for their care, protection, and maintenance	Rights of children impacted by the project need to be protected.
Labor Act (2007)	Provides the legal framework for administration of labor, recruitment and hiring of labor, and protection of wages	The project hiring and management of its labor force should adhere to this framework
Anti-littering Regulations, 2007	Addresses waste management and pollution issues in relation to environmental health and hygiene	The project must ensure that all waste produced during all phases is well managed.
The Women’s Act 2010	Aims to advance women’s rights to promote their economic and social empowerment	Relevant to this project in view of potential impact on women; need for adherence to this act to avoid gender-based violence (GBV) and sexual exploitation and abuse/ harassment (SEA/SH) during

TITLE OF ACT OR REGULATIONS	DESCRIPTION	RELEVANCE TO THE PROJECT
		the hiring process and Project implementation period.
Environmental Impact Assessment Regulations, 2014	The EIA Regulations elaborate on the requirements for EIA procedure, environmental impact statements, approval, environmental monitoring, etc.	The Regulations provide more details for the EIA of this project and implementation of its ESMP.
Sexual Offences Act, 2013	Updates the law and procedures regarding the trial of rape, sexual offences, and related matters	This Act is relevant to the Project due to the need for protection of vulnerable persons within the Project sites against sexual offences, as defined in the Act

3.3 International and Regional Treaties ratified by The Gambia that are most relevant to this Project include:

- UN Framework Convention on Climate Change (UNFCCC) 1994
- African Charter on Human and People’s Rights (ACHPR) (1983) and Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018
- Convention on the Rights of the Child (CRC), August 1990
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1993
- Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (CMW), 2017
- International Covenant on Economic, Social and Cultural Rights (ICESCR), 1976

Table 3-3: Relevant International Conventions Ratified by The Gambia

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
United Nations Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and the Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (OP-CEDAW)	Ratified 1993	Convention ensures the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men	The Convention highlights the right of women is central to their financial independence and may be critical to their ability to earn a livelihood and to provide adequate housing and nutrition for themselves and for their children; women should have access to benefits of this project as men.

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
UN Framework Convention on Climate Change (UNFCCC) 1994	Ratified 1994	The ultimate objective of the Convention is to stabilize greenhouse gas concentrations "at a level that would prevent dangerous anthropogenic (human induced) interference with the climate system".	The project could potentially cause Air pollution on the site and the surrounding area from emissions which follow construction activities.
UN convention on the rights of the child, (UNICEF 1989)	Ratified 1990	The rights in the treaty include the right to education, the right to play, the right to health and the right to respect for privacy and family life	The project could potentially affect the right to health of the child through the generation of air pollution, poor waste management
Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018	Ratified July 2020	The Protocol seeks to promote, protect, and ensure the full and equal enjoyment of all human and peoples, rights by all persons with disabilities. The convention aim is to protect children from treatment or activities which can be very harmful for their physical and mental health.	People with disabilities could be potentially impacted during project activities.
Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor 1999	Ratified in August, 2020	The convention aim is to protect children from treatment or activities which can be very harmful for their physical and mental health. The Convention supports the prohibition and elimination of the worst forms of child labor,	Child labor might be carried out during project activities due to poverty and the difficulties faced by parents who work for the project.
International Covenant on Economic, Social and Cultural Rights (ICESCR), 1976	Ratified 1978	The Convention aims to ensure the protection of economic, social and cultural rights including: the right to self-determination of all peoples; the right to non-discrimination based on race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status; the equal right of men and women to enjoy the rights in the ICESCR; the right to work; the right to form and join trade unions (article 8); the right to social security;	The project can potentially discriminate against workers in every aspect mentioned in the previous column and this can affect their overall development.

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
		protection and assistance to the family; the right to an adequate standard of living; the right to health; the right to education; and the right to cultural freedoms.	

3.4 Institutional Framework

Relevant institutions to be involved in the implementation and monitoring of the ESMP are:

- Gambia Bureau of Statistics (GBoS)
- PIU (GBoS)
- Ministry of Finance and Economic Affairs (MoFEA)
- Ministry of Health
- Ministry of Gender, Children and Social Welfare (MoGCSW) - Women's Bureau and Department of Social Welfare
- National Environment Agency (NEA)
- Ministry of Environment, Climate Change and Natural Resources (MECCNAR)
- Kanifing Municipal Council (KMC)

The breakdown of the institutional arrangement for the ESMP implementation is as follows:

Table 3-4: Institutional Framework

Institutions	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
Ministry of Finance and Economic Affairs.	Oversees Project Implementation of World Bank Policies and law of The Gambia.	Policy guidance Supervise GBoS management to implement the applicable Environmental and Social Safeguard Policies.	During the lifecycle of the Project
PIU (GBoS)	Provides coordination support of the project implementation process.	Supports the development and implementation of the Safeguard Instruments. Support in the coordination of construction/rehabilitation activities. Ensure that they are in line with World Bank's Safeguard Policies	During the lifecycle of the Project
Gambia Bureau of Statistics	Coordinate the project implementation	Coordinate all construction/rehabilitation activities in the project. Work with the Safeguard Team at PIU, to implement the ESMP of the project.	During the lifecycle of the Project

Institutions	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
National Environment Agency (NEA)	The NEA enforces the NEMA, 1994 and EIA Regulations 2014	-Evaluation of the ESMP report -Grant Environmental Approval for the Project -Monitoring the ESMP implementation	During the lifecycle of the sub-project
Ministry of Environment, Climate Change and Natural Resources	Oversees the NEA and implementation of environmental laws and policies of The Gambia	Policy guidance Oversees the NEA Management that is key to this Project	During the lifecycle of the sub-project
Ministry of Health	Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development	-Providing guidance on transmissible diseases to consider during sensitization. -Promoting safe and healthy environments at the project site, including response to incidents of GBV or VAC. In response to GBV or VAC, there are one-stop Centers under the Ministry of Health. These are where survivors are referred to for social and psychological therapy. -Responding to accidents	During the lifecycle of the Project
Women's Bureau	Under the Ministry of Gender, Children and Social Welfare, the Women's Bureau specifically promotes gender equity and women's empowerment in The Gambia.	Ensures women's rights affected by the Project are protected. Participates in sensitization on gender issues, including, prevention and response to GBV, VAC, SEA/SH, etc.	During the lifecycle of the Project
Department of Social Welfare	This government department protects and promotes the rights of vulnerable people such as children, women and the disabled.	Supports and guides the process during cases of grievance. Participates in sensitization on prevention and response to GBV, SEA/SH, VAC etc.	During the lifecycle of the Project
Kanifing Municipal Council	Responsible for refuse collection and municipal maintenance.	Ensure that construction refuse is constantly collected and disposed of safely.	During the lifecycle of the sub-project

3.5 World Bank Environmental and Social Framework

The World Bank ESF seeks to support borrowers to develop and implement environmentally and socially sustainable projects as well as build capacity in the assessment and management of

environmental and social impacts and risks associated with the implementation and operation of projects. The ESF contains Environmental and Social Standards (ESSs) that borrowers must apply to all projects for the projects to be sustainable, non-discriminatory, transparent, participatory, environmentally and socially accountable as well as conform to good international industry practices. Out of the ten ESSs, the relevant ESSs are presented in Table 3-5.

Table 3-5: Relevant World Bank Environmental and Social Standards that apply to: HISWACA-SOP1

ESS	Key Requirements	Status	Remarks/Comments
Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Impacts and Risks	Provides structured processes or procedures for project categorization, assessing and evaluating potential project environmental and social risks and impacts, as well as management of same (mitigation hierarchy). This standard also sets out Borrower's requirements, including the preparation of various instruments such as Environmental and Social Management Frameworks, Environmental and Social Impact Assessment, Environmental and Social Management Plans and Environmental and Social Commitment Plans as well as information disclosure. The standard also lays out project environmental and social monitoring and reporting requirements. ESS1 establishes the applicability of the other ESSs. It establishes the basis for categorizing projects based on the borrower's capacity to manage and monitor environmental and social risks/impacts as well as the implementation of mitigation measures, socio-political context, scale of the undertaken as well as spatial extent and significance of anticipated impacts and Risks. An umbrella ESMF has been prepared during the preparation of the project.	Relevant	<ul style="list-style-type: none"> • Sub projects and activities envisaged under the project include rehabilitation/renovation and construction activities in The Gambia. Modernization activities limited to IT purchases will be carried out. • No replacement of existing defunct equipment is envisaged. These impacts and risks include limited incidence of gender- based violence. • There are also general construction impacts and risks, notably noise and air pollution, generation of construction and general waste, e-waste, occupational and community health and safety. During operations, main risks include Life and Fire Safety, security, energy efficiency, GHG and ozone depleting substance emissions, labor management related risks, national censuses, and surveys, which entail risks of traffic-related accidents, and injuries to workers and local communities due to discarding old equipment, improper disposal of electronic waste and others; management of other wastes and wastewater.
Environmental and Social Standard 2 (ESS2): Labor and Working Conditions	It is to ensure a safe, healthy and conducive working environment for workers and ensure that the environment is free of forced and child labor as well as other forms of intimidation, discrimination and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law. The standard also seeks to protect vulnerable workers. The Labor and Working Conditions requirements	Relevant	<ul style="list-style-type: none"> • The project will employ workers, including enumerators, field supervisors, data entry clerks and site workers who need to provide their services in a safe environment devoid of discrimination, SEA/SH, intimidation, child and forced labor as defined by in-country laws. • Project workers need to be informed about SEA/SH risks and sign code of conduct detailing unacceptable behaviors (including SEA/SH) and sanctions for misconduct. • Project workers need to have access to a participatory, transparent, time-bound grievance mechanism, including procedures to receive and handle SEA/SH complaints,

	<p>cover to direct, indirect, community and contracted workers as well as primary supply workers on Bank - financed projects.</p> <p>An umbrella LMP has been prepared prior during project preparation which includes measures for each national PIU to adopt a grievance mechanism (GM) for all categories of project workers and outline roles and responsibilities of contractors and PIUs in managing the requirements of ESS2.</p>		<p>established for the purpose of HISWACA-SOP1.</p> <ul style="list-style-type: none"> • Project workers need to be informed about their rights and encouraged to form worker unions/association within the remit of the Gambian law. Their Freedom of Association should be guaranteed by the project/their employers. • The Project has prepared a Labor Management Procedure in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank and will also establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. • Prepare, adopt, and implement occupational, health and safety (OHS) measures, including emergency preparedness and response measure specified in the ESMP and ESMF. • Project workers will need to sign the Code of Conduct.
<p>Environmental and Social Standard 3(ESS3): Resource Efficiency and Pollution Prevention and Management</p>	<p>ESS 3 promotes sustainable resource utilization, avoiding and/or minimizing project pollution, generation of hazardous and non-hazardous waste and project-related emissions. This standard enjoins Borrowers to ensure efficient use of energy, water and other raw materials as well as manage air pollution, hazardous and non-hazardous waste, chemicals and hazardous materials (including pesticides) in both degraded and non-degraded areas given their technical and financial feasibility in line with Good International Industry Practice (GIIP).</p> <p>Data archiving and storage might require substantial amount of electricity use and cooling. Such facilities should be designed in a way that energy efficiency should be in place, and ozone depleting substances (ODS) are not used for cooling.</p>	<p>Relevant</p>	<ul style="list-style-type: none"> • Rehabilitation of the existing GBoS office in The Gambia will involve choice of cooling technology and IT systems and choice of energy systems • Project implementation will involve the use of servers, and cooling systems and utilize energy. Issues of conversation and efficiency should be considered in the choice of energy and cooling systems as well as water. • The project will generate construction, general and hazardous (e.g., paints, oils) waste during rehabilitation in The Gambia and installation of IT equipment in some offices. During the operational phase, general and hazardous waste (e.g., e-waste) will be generated. • These waste streams will have to be disposed of in accordance with the World Bank EHGS and other GIIPs. A waste management plan has been prepared as part of the ESMP IN Annex 4.
<p>Environmental and Social Standard 4 (ESS4): Community Health and Safety</p>	<p>Environmental and Social Standard 4 (ESS4) is titled “Community Health and Safety”. The objective of this standard is to anticipate, avoid and/or mitigate adverse project impacts on beneficiary communities as well as safeguard project-affected communities from traffic and road safety risks, diseases and hazardous</p>	<p>Relevant</p>	<ul style="list-style-type: none"> • Issues of traffic and road safety may arise during civil works, organization of census, and or surveys. Persons or groups on account of physical disability, displacements due to internal conflicts or extreme weather events, their geographical location and/or their livelihood patterns may be excluded from project activities e.g., their data will not be collected, analyzed and/or presented during

	<p>materials as well as SEA/SH risks associated with project implementation and operation. ESS4 enjoins Borrowers to establish contingency measures for emergencies, security, traffic management, road safety, the protection of eco-systems and protection from SEA/SH. The standard also requires the design of infrastructure to meet GIIP.</p>		<p>national census and other surveys, just as their confidential information may find itself in the public domain.</p> <ul style="list-style-type: none"> • Security concerns in border communities (between the Gambia and Senegal) around Casamance may minimally affect fieldwork activities. • The Project will mitigate risks of SEA/SH by ensuring that: (i) all project related staff and workers (including surveys enumerators) sign code of conduct with clear prohibition and sanctions against SEA/SH after receiving training on SEA/SH; (ii) use the developed SEA/SH specific procedures within the grievance mechanism with multiple channels to submit complaints, confirmed as safe and accessible during consultations with women, and with procedures allowing for complaint verification and management following a survivor centered approach; (iii) the grievance mechanism includes response protocol with referrals to local GBV service providers (identified through mapping of GBV service providers) offering medical, psychosocial and/or legal assistance; (iv) information campaigns on SEA/SH risks, content of code of conduct and ways to submit complaints will be organized by the project in the areas of its implementation. An SEA/SH prevention and response Action Plan has been developed as part of the ESMP and a GBV Consultant will be hired to support the implementation of the SEA/SH measures within that Action Plan.
<p>Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on land use, and Involuntary Resettlement</p>	<p>The basic principle of the standard is that involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it should be limited, and appropriate measures to minimize negative impacts on displaced persons (and host communities that receive displaced persons) should be carefully planned and implemented.</p>	<p>Not Relevant</p>	<ul style="list-style-type: none"> • The project does not envisage new land use as the works will be carried out on an existing building.
<p>Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>	<p>The standard recognizes that the protection and conservation of biodiversity, and the sustainable management of living natural resources, are critical to sustainable development. It also recognizes the importance of conserving the key ecological functions of habitats, including forests, and the biodiversity they support.</p>	<p>Not Relevant</p>	<ul style="list-style-type: none"> • There are no significant plants (including forests) or animal species on or around the site.

Environmental and Social Standard 7 (ESS7): Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	<p>This standard 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.</p>	<p>Not Relevant</p>	<p>There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities at the Project Intervention Area.</p>
Environmental and Social Standard 8 (ESS8): Cultural Heritage	<p>The standard recognizes that cultural heritage provides a continuum of tangible and intangible forms between the past, present, and future. ESS 8 sets out material measures designed to protect cultural heritage throughout the life of a project</p>	<p>Relevant</p>	<p>While physical works will take place on an existing site, and there is no proposed use of intangible cultural heritage, Chance Finds procedure will be included as part of the ESMP. A chance finds clause will also be added to the works contract, requiring the contractor to stop construction as per the procedures, if cultural heritage is encountered during the rehabilitation.</p>
Environmental and Social Standard 9 (ESS9): Financial Intermediaries (FIs)	<p>ESS9 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.</p>	<p>Not Relevant</p>	<p>There are no Financial intermediaries in the Project.</p>
Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure	<p>ESS10 establishes a systematic approach to stakeholder engagement while ensuring that appropriate information on project risks and impacts is provided to stakeholders in a timely, comprehensive, accessible, and appropriate manner. The standard also ensures inclusive and effective engagement of project-affected parties throughout the project cycle and provides avenues for assessing stakeholder interest and incorporating their views into project design and monitoring of projects. As part of meeting the requirements of ESS 10, borrowers are to undertake meaningful consultation and engagement of stakeholders throughout the project life cycle, including specifically with women. They are also expected to disclose</p>	<p>Relevant</p>	<p>The project needs to identify relevant stakeholders and potential barriers for effective consultation/stakeholders including marginalized and vulnerable groups such as Persons Living with Disability should be identified together with how they can influence the project outcomes and project impact socio-economic and their interests. These stakeholders need to be consulted early and regularly throughout the project life cycle for their views and inputs on the proposed project interventions in a systematic manner. Transparent and accessible channels need to be provided under the project to receive grievances of project-affected persons, including vulnerable persons identified. The grievances must be investigated and resolved, and feedback provided in a participatory, transparent, and timeous manner. A SEP, including a grievance mechanism, has been prepared and shall be disclosed upon no objection by the World Bank. The document shall be</p>

	<p>relevant project information and safeguards reports, notably Stakeholder Engagement Plans, as part of fulfilling the requirement of this standard. ESS10 also requires borrowers to set up grievance mechanisms that are transparent, culturally appropriate, objective, discrete, accessible as well as sensitive and responsive to the needs of aggrieved persons and with procedures to receive and manage SEA/SH related complaints. A Stakeholder Engagement Framework has been prepared during project preparation.</p>	<p>implemented throughout the project implementation once approved by the Bank and disclosed.</p>
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The Environmental and Social Commitment Plan (ESCP) has been prepared to set out material measures and actions that the Republic of the Gambia shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. The Stakeholder Engagement Plan (SEP) was prepared in line with the approved Stakeholder Engagement Framework (SEF) describing a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle recognizing the need for an effective and inclusive engagement with all of the relevant stakeholders and the population at large. The Labor Management Procedures (LMP) has equally been developed in line with the Umbrella Labor Management Procedures Framework (U-LMPF) to address the issue of worker treatment and working conditions during the life cycle of the Project.

4 ENVIRONMENTAL AND SOCIAL BASELINE

This section describes the general environmental and social baseline conditions of Kanifing where the sub-project will be implemented.

4.1 The Physical Environment

Kanifing is a small town located west of the capital, Banjul and part of the Kanifing Local Government Area. It consists of an industrial Area which hosts factories, schools, hospitals and Offices. There is also a residential area about 1 km away from GBoS. Buildings around GBoS are mainly offices as can be seen in the picture below.

Figure 1: Map of The Gambia showing the location of GBoS



Figure 2: Satellite view showing offices around GBoS Building



Climate

The climatic condition in Kanifing, The Gambia is of the Sudano-Sahelian type and is characterized by the occurrence of two distinct seasons: a hot rainy season (tropical wet) from May/June to October, and a dry (savanna) season from November to May with rare occurrence of rainfall in May and October.

During the rainy season, south-westerly monsoon winds combined with heat from the continent, and because of the northward movement of the wind, give rise to the formation of thundery activities.

In the dry season (during the months of December to April) north-easterly winds (the Harmattan) blow from the Sahara towards the western coast of Africa resulting in the presence of dust particles in the air, and general cloudless skies and dry air.

The district's yearly temperature is 28.69°C (83.64°F) and it is -0.89% lower than The Gambia's averages. Kanifing typically receives about 86.2 millimeters (3.39 inches) of precipitation and has 76.78 rainy days (21.04% of the time) annually¹.

Topography

Generally, the topography of The Gambia is flat with little difference in altitude between the east and west, although the eastern part is hillier (elevation ranging between 50-60 meters) than the western portion; this is due in part to the River Gambia, which runs through the entire length of the country cutting deep valleys in the upper reaches as it flows towards the west. The western part is flatter, the deep valley giving way to wider flood plains as it empties into the Atlantic Ocean. Kanifing is located at an elevation of 8.36 meters (27.43 feet) above sea level.

Water Resources

The River Gambia is a dominant hydrological feature of the country and flows from east to west for about 400 km. Along the river, the width of the valley varies from 20 to 40 km, and three major sections may be distinguished: (i) The Upper Valley (UV), where floods occur occasionally, and the water is always fresh. (ii) The Central Valley (CV), where tidal influence exists, but the water is also fresh. In the lower CV, water is fresh only during the rainy season while in the dry season, when the salt tongue moves as far as 250 km upstream, it becomes brackish. Thus, in the dry season, about 220 km of freshwater are left in the Central and Upper River Region. (iii) The Lower Valley (LV) in the Central River Region, where water is occasionally saline because of permanent tidal influence.

The country's total actual renewable water resources are estimated at 8 km³/year, of which about 3 km³ are internally produced, and the remaining 5 km³ represent the inflow of the River Gambia from Senegal². It is estimated that internally produced groundwater amounts to about 0.5 km³/year, all of which is drained by the River Gambia and becomes the base flow of the river. Groundwater is available in all parts of The Gambia. The country is in one of Africa's major sedimentary basins and is often referred to as the Mauritania/Senegal Basin. It is characterized by two main aquifer systems with water table depths varying from 10 m to 450 m.

4.2 The Biological Environment

There is no presence of significant plant and animal species at or around the site.

¹ <https://weatherandclimate.com/the-gambia/banjul/kanifing>

² Aquastats database: The Gambia. FAO, Rome. Accessed on 21/12/2018

4.3 The Socio-Economic Baseline

i. Ethnic composition

The Gambia is a multi-ethnic and multi-racial society, exhibiting a high degree of ethnic and religious tolerance. The country's main ethnic groups are the Mandinka, Wolof, Fula, Jola, Serer and Sarahule groups. The Mandinkas constitute most of The Gambia's population, followed by the Fula and Wolof groups.

ii. Languages

English is the official language of the country, but the most frequently spoken languages are generally Mandinka and Wolof. Other languages spoken include Pulaar (Fulbe), Serer, Jola, and Sarahule. However, there are dominant languages in some regions in addition to these main languages such as Serahule in URR, and Jola in Foni. Some Muslim clerics are literate in Arabic.

iii. Religion

The overwhelming majority of the population are Muslims as they constitute 96.4% of the population and some 3.5% are Christians. 0.1% practice other religions (including African Traditional Religion).

iv. Demographic trends

Urbanization is partly driven by internal migration from rural areas into urban areas, as well as into the capital region including Kanifing in search of jobs. The rapid increase in urban population has brought with it several environmental and socio-economic problems including deforestation; soil erosion; air and water pollution; flooding, waste generation; stress on health services, education, and employment services. Over the past few decades, rapid urbanization triggered by high rural-to-urban migration led poor people, often youth, to amass in and around congested urban areas where inequality is high, traditional support systems are typically weak, and women face barriers in labor market participation.

Urbanization is proceeding at a fast pace, with urban population growing at 4.5 percent per year during 2000–17, and thus, the share of the population in urban areas increasing from 47.9 percent in 2000 to 60.6 percent in 2017 according to the World Bank Systematic Country Diagnostic 2020 report.

The Gambia's hub of key economic activities that includes tourism, trade, and government administration, the poverty rate was about 17 percent³.

During Project implementation, materials to be delivered on site are likely to pass through Kafuta, Faraba sutu, Sotokoi, Faraba Banta, Pirang, Kuloro, Mandinaba, Serekundanding, Kembujeh, Brikama, Farato, Busumbala, Yundum, Banjulinding, Lamin, Abuko, Latrikunda, Tallinding, churchills town, westfield, kairaba Avenue, Pipeline and Kanifing Estate. The following rules will be put in place and delivery drivers sensitized on them to ensure less or no negative impact to these communities is envisaged;

- a) All bulk materials will be properly covered to avoid air pollution or accidents.
- b) No delivery personnel should sit on bulk material during transport.
- c) Delivery of bulk or heavy-duty materials or equipment should be done off peak hours (outside 7am – 5pm).

³ The Gambia Systematic Country Diagnostic Report 2020

- d) Suppliers should make sure that the delivery vehicles used are well maintained with valid insurance, comprehensive coverage to cover all occupants and do not have any known mechanical faults.
- e) Recommended speed level (20km/hr) should be maintained within the residential areas to avoid accidents.
- f) All drivers should have valid driver's license and good knowledge of traffic signs or symbols.

v. Youth

The National Youth Policy (2019-2028) defines youth as 'all young males and females aged 15–35 years, who are citizens of The Republic of The Gambia'. The youth population is estimated 36.7 per cent of the total population; females represent 38.5 per cent and males 34.8 per cent. Banjul, Kanifing and Brikama have higher youthful population than the national average in 2013 census which means that youth are more concentrated in urban areas as opposed to rural areas. The census also showed that the proportion of female youth is higher than the male in all the Local Governments Areas (LGAs). The growing youthful population of The Gambia raises many questions among them are education, employment and assuring a decent standard of living to all. The combined rate of unemployment and the potential labor force for the youth population is 38.6% with youths in Kanifing Local Government Area occupying 37.2% of the overall percentage⁴. There is also the ongoing challenge of illegal migration of the youth overseas particularly to Europe which have sometimes resulted in tragic loss of lives on the high seas. These and others are major challenges that should be factored in the provision of training to improve youth development and empowerment. This project can assist in providing youths with temporary employment opportunities in accordance with the national requirements and the World Bank E&S standard 2.

vi. Gender

Gender disparities in The Gambia are still significant, and the resulting constraints in education, health, income, and legal rights prevent women from participating effectively in national development. This is partly because Gambian society is still very much patriarchal, and women are perceived primarily as wives and mothers whereas men are the main breadwinners. In their assigned role as the main caregivers within the home, women are particularly disadvantaged in the labor market because of the need to combine paid jobs with unpaid work such as childcare and household chores. This leaves them with fewer employment choices. Access to credit is also generally more difficult for women especially rural women who are discriminated against as regards access to credit because they do not own land and cannot offer land as adequate security or collateral. Child marriage, teenage pregnancy and low literacy rates further reduce employment prospects.

Partly because of these gaps, the majority of the poor and extremely poor in The Gambia is made up of the women who comprise up to 50.5 percent of the national population according to The Gambia Population and Housing Census, 2013-Gambia Bureau of Statistics and The Gender Inequality Index (GII).

In 2022, The Gambia was ranked 174 out of 191 countries with a score of 0.500, according to the UNDP Human Development Report's Index ranking. According to the Gender Inequality Index⁵ (GII), 2021,

⁴ Adopted Proxy for the Unemployment rate, 2023 Gambia Bureau of Statistics

⁵ The Gender Inequality Index (GII) reflects women's disadvantage in three dimensions—reproductive health, empowerment, and the labor market—for as many countries as data of reasonable quality allow. The index shows the loss in human development due to inequality between female and male achievements in these

Gambia was ranked 153^d with a value of 0.611; poverty of women is closely linked with very low literacy levels (29.9 percent for women and 43.2 percent for men) and education attainment rates for a variety of reasons, including restrictive cultural norms and challenges in physical access to school.

To address these challenges and reduce gender disparity, the Government formulated policies and legislations to increase opportunities for women and prevent violence against women. The policies include “Gender and Women Empowerment Policy 2010-2020” which has the “overall goal ... to mainstream gender in all national and sectoral policies, programs, plans and budgets to achieve gender, equity, equality and women empowerment in the development process.” Specific legislation to address these conditions include the Women’s Act, 2010, which seeks to eliminate all forms of discrimination against women and the Women’s Amendment Act, 2015, which specifically prohibits Female Genital Mutilation (FGM), a provision absent in the 2010 Act as three out of four women aged 15-49 have undergone female genital mutilation. There is also the Sexual Offences Act, 2013, which provides protection against sexual crimes against all persons, especially vulnerable groups, including women, children and people who are mentally and physically disabled.

vii. Health Sector

The health system continues to be under pressure due to a number of factors, which include limited budgetary allocation, equipment, medication and Human Resource. Other constraints include weak health information system; shortage of adequately and appropriately trained health staff; high attrition rate and lack of efficient and effective referral system.⁶ The Kanifing General Hospital is about 5 minutes’ drive away from the GBoS Office Complex. The hospital is open and accessible to all at any point in time, so should workers have any issues related to OHS or accidents, they will be attended to upon arrival at the emergency department of the hospital.

The main challenges faced by the population in the sector include affordability and high poverty levels resulting to the high prevalence of communicable and non-communicable diseases such as Malaria, Diarrhea, etc. Most of these diseases are easily preventable if appropriate environmental and lifestyle measures are taken, with more attention paid to development of health promotion and prevention actions than merely focusing on curative care alone.

viii. Gender-Based Violence (GBV)

All gender especially women and girls in The Gambia experience violence at high levels. For example, women and girls marry very young in The Gambia, with nearly a quarter (24%) of females aged 15-19 already married.

dimensions. It ranges from 0, which indicates that women and men fare equally, to 1, which indicates that women fare as poorly as possible in all measured dimensions.

⁶National Health Policy- 2012 – 2020: Ministry of Health and Social Welfare.

Acceptability of violence against women and girls remains high, with 55% of women justifying intimate partner violence in some circumstances. Harmful social and gender norms, beliefs and behaviors contribute to sustained discrimination of women and girls, and ultimately to a high prevalence of GBV, with 46% of women aged 15-49 having experienced physical violence at least once in their lifetime and 41% having experienced intimate partner violence (IPV). Additionally, social norms limit women's access to opportunities and decision making, with less than a third of married women participating in the decision-making either alone or jointly with their partner, regarding their own health care, major household expenses or social interactions (DHS, 2019-20).

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risks are moderate in the Gambia as sensitizations are usually held from national level (Ministry of Gender, Children and Social Welfare) to the community level by regional Social Welfare Officers, Civil Society Organizations (CSOs) and Safeguards Units of development Projects.

There are One Stop Centers in all regions in the Gambia that deliver holistic health, legal and psychosocial support services to survivors of GBV, thus strengthening the country's GBV response mechanism and promoting the well-being, health and dignity of all survivors, especially women, and girls. For the purpose of the sub-project, the ones in Banjul and Kanifing Municipality will be sufficient for referral of survivors.

ix. Violence Against Children (VAC)

Violence Against Children (VAC) is defined as physical, sexual, emotional and/or psychological harm, neglect, or negligent treatment of minor children (i.e., under the age of 18), including exposure to such harm,⁷ that results in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power. This includes using children for profit, labor⁸, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography. In The Gambia, for instance, there have been reports of children, mostly girls, subjected to domestic service and commercial forms of exploitation (i.e., tourism).⁹ Boys in urban areas are known to work as taxi or bus attendants whilst girls work as street vendors, selling food items such as candy, water, food, or fruits for their parents.

During the implementation of this Project, the potential areas where this can be manifested may include:

- Employing children under the age of 18 years for construction/rehabilitation activities, which consists of block making, masonry, or transporting of bulk material etc. Children may also be used for personal or financial advantage by both the contractor and workers engaged in the construction work. Any other ways may include using children for sexual exploitation and physical or sexual violence, especially during the short stay of workers onsite.

In this regard, the Project Implementation Unit (PIU) and Contractors must ensure that no aspect of the sub-project works involve children under the minimum age of 16 for light work (as per *The*

⁷ Exposure to GBV can also be considered VAC where there is a gender bias and/or the act is of a sexual nature, such as SEA, which is a form of GBV and can be experienced by both girls and boys.

⁸ The employment of children must comply with all relevant national legislation, including labor laws in relation to child labor and the World Bank's policies on child labor and minimum age. They must also be able to meet the Project's Occupational Health and Safety competency standards.

⁹⁹ See note 5.

Children's Act, 2005), and none under the age of 18 for hazardous work and work that affects their schooling and social or moral development.

The Labor Act, 2007, prohibits children under 18 from engaging in agricultural, industrial, or non-industrial work for economic gains. In addition, to strengthen and protect children against possible violence and exploitation, Project code of conduct, Action Plan for Implementing ESHS and OHS Standards, as well as the SEA/SH Prevention and Response Action Plan must be rigorously applied and monitored for compliance (See sub-annex A (CoC) & B (Response Protocol for SEA/SH Complaints) of Annex 1 ,GM) . These codes of conduct will be included in the Contractor's ESMP.

x. Disadvantaged and Vulnerable Groups

This category includes women and others who, for reasons already mentioned above, are generally marginalized and unable to fully participate and benefit from the development benefits. By virtue of their position in society and restrictive gender norms, they are also more vulnerable to risks related to SEA/SH. In addition to women, other groups regarded as vulnerable and disadvantaged include the elderly, minors, and persons with disabilities. Like the women, these groups are more likely to be adversely affected by sub-project activities since they might be street vendors selling food or fruits etc. nearby and may have to interact with workers based on that. They may also not be adequately consulted about the sub-project because of their inability to attend meetings or failure to understand the language that the meeting is being conducted. These and other factors can combine to reduce their access to potential project benefits. This category will therefore require specific measures and/or assistance to address their vulnerability to certain risks, including SEA/SH and VAC. These include arranging special meetings with these groups and ensuring that they participate in project activities.

5 PUBLIC CONSULTATION

This chapter presents the approach that was taken to conduct stakeholder consultations in the process of developing the ESMP. It describes the process through which the stakeholders, among other things, shared local information with the consultants. As part of the stakeholder consultation and engagement program, the consultants held several public meetings to Project Affected People (PAP)s in September 2023 and to all relevant stakeholders. The list of community representatives consulted is in annex 2. Moreover, the consultants held Stakeholder Needs Assessment during the ESIA screening at the GBOS premise with PAPs around the area.

The participants of the various public meetings included the following

- I. Institutions around the GBOS Office Complex
- II. Project Affected-Persons (PAPs)

Figure 3: Consultation with staff of Offices around GBOS

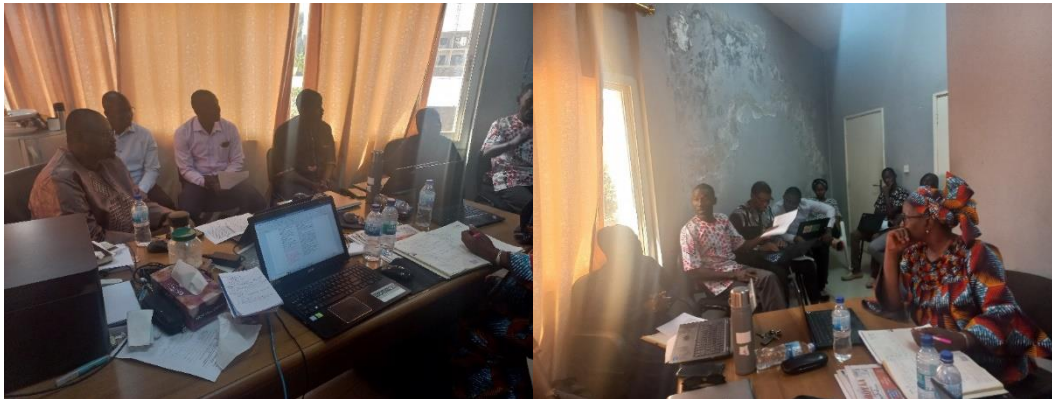


Figure 4: Consultation with The Head of Environmental & Social Impact Assessment (Mr Lamin Samateh) at NEA



5.1 Overview

A comprehensive consultation was conducted with all the Project Affected Persons (PAPs) within the preparatory phase of the project. These consultations were provided with the opportunity for stakeholders to engage in the planning process, to raise questions and receive inputs and responses to their concerns. The ESMP will continue to consult the PAPs who are likely to be adversely affected by the project activities of their rights for mitigations. In addition, in consultation with the community and coordination with the GBOS authorities, a Social Committee for Grievance Redress will be set up in the ESMP.

A review of the U-ESMF prepared by World Bank was conducted by the consultants contracted by GBOS to develop the Safeguards Instruments in September 2023. The team called for a multi-stakeholder consultation meeting to engage all stakeholders in order to get their opinions on the ESMP. After the presentation, the consultants explained to the participants the background, intended scope and process for the ESMP before the floor was opened for participants' comments and recommendations.

5.2 Objectives of consultation

The consultations were held with stakeholders, institutions and PAPs aimed at achieving the following objectives:

- i. discuss the sub-project with potential beneficiaries, highlighting its components and the potential positive and negative impacts, and the proposed mitigation measures that will be put in place;
- ii. facilitate transparency and inclusive participation of community members in the project so they can voice their concerns and views regarding the project design and its project impacts, and to ask questions;

5.3 Methodological Approach

The approach adopted in the process was guided by the following principles:

- **Free:** Engagement was free of external manipulation or coercion and intimidation.
- **Prior:** Engagement was undertaken in a timely way and prior to decisions being made so that views expressed can be considered in project design
- **Informed:** Relevant and understandable Project information was disclosed to help stakeholders to understand the risks, impacts and opportunities of the Project.
- **Inclusive and Accessible:** All participants should be able to participate in a language, location, and format accessible to them. Particular attention should be paid to vulnerable and disadvantaged persons to be able to participate.

Reactions and feedback from stakeholders were used to inform the ESMP, identify and assess impacts and develop appropriate mitigation measures. Since stakeholder engagement is a continuous process, Ongoing engagement activities will be managed by the PIU, GBOS and the Contractor as the Project moves into the implementation phase.

Different engagement methods are proposed and cover different needs of the stakeholders as below:

- Consultation meetings
- Focus group meetings
- One on one interview
- Public notices
- Electronic publications and press releases on the GBOS website and major radio stations
- Telephone/Mobile Interview
- Text messages
- Social media

The following representatives from institutions were consulted:

- Gambia Bureau of Statistics (GBoS)
- National Environment Agency (NEA)
- GAI Construction
- West African International School (WAIS JUNIOR)
- Ministry of Gender, Children and Social Welfare (MoGCS)
- Gambia Teachers' Union Co-operative Credit Union (GTUCCU)
- National Audit Office (NAO)
- Gambia Revenue Authority (GRA)
- Street vendors around the GBoS Office Complex

The purpose of this consultation is to collect the technical opinions and concerns of the technical services and to measure the social acceptability of the Project. The major issues addressed by the different parties revolved around the following points:

- Measures to address fears and concerns during rehabilitation/construction.
- Assurance that both women's and men's views will be taken on board in the project design
- Means of undertaking public consultation in all –inclusive manner
- community participation and instant feedback into the project design especially related to matters of proper drainage system during construction work,
- awareness creation and identified positive and negative socio-economic impacts of the GBoS project, proposed mitigation measures to address the potential impacts during pre-construction/rehabilitation, construction/rehabilitation and operation phases programs,
- workplace accidents (of workers and others on/near the premises where activities are taking place).

5.4 Feedback from Stakeholders

The following are some of the issues and concerns raised at the meetings which responded to and as much as possible with recommendations were made which have been incorporated in project design;

- I. Road safety measures for school children attending a nearby private school.
- II. Public appreciation and concerns of the GBoS project due to their importance
- III. High expectations (direct and indirect jobs creation and employment generations from the project)
- IV. Establishment of a Grievance Mechanism for PAPs and all stakeholders and the need for continuous information sharing.
- V. Establishment of toll-free number
- VI. Waste generation and disposal along the project site corridor
- VII. Noise and excessive vibration during construction

The project has generally received a favorable opinion from those consulted. However, it requires the implementation of accompanying technical, environmental & social measures.

The following table presents the summary of the results of the public consultation.

Table 5-1: Summary of Stakeholder Engagement Meetings

Stakeholder	Stakeholders' comment	Recommendations of Stakeholder to the project	Action (s) to be taken by the project
NEA	In the case of a rehabilitation of the existing building, there will be a need to have an environmental and social management plan.	-The E&S Safeguards instruments developed need to be validated by the Agency. -Also, an environmental monitoring mechanism must be established and the capacities of the monitoring stakeholders must be established.	NEA will be consulted after the E&S safeguards instruments are developed so that can be validated and disclosed in-country. They will then review the proposed monitoring mechanism stated in the ESMP.
GTUCCU & GRA	-Noise Pollution -Use of heavy machines might cause movement of buildings -Bulky materials like sand and gravel blocking the road	-Neighbors need to be notified before work start. -Noise reduction can be considered by scheduling some heavy works after working hours There should be a place on site identified to stock bulk materials within the premises Procedures of pouring concrete or plastering should be done in a way where it can be minimal	Contractor will develop C-ESMP before works start and the Contractor's safeguards team will be responsible for training of workers on ESHS and OHS during project implementation
NAO	Proper drainage system should be factored as delivery vehicles can destroy the street thereby causing stagnant water and potential flooding in the area	During the design stage, it is important to consult NAWEC and NRA to know the future drainage of materials	There will continuous consultation with relevant institutions.
GBoS	Drainage of rainwater in the compound is terrible as a local gully was constructed but inadequate and doesn't do the job Security of materials during work is a concern	-Proper drainage should be constructed within the compound to avoid collapse of the fence due to undermining by water	-The site engineer will make sure that there is a proper drainage system before work start -The contractor will hire a site security officers
GAI	-Safety of workers is a concern. -Dust pollution -Site and surrounding can be left with scrap materials like nails which can be dangerous -As they are working with high heights, scaffolding should be	-CCTV to be installed to secure materials but neighbor have to be informed. -All aggregate need to be sieved before being transferred on site or even have a concrete batching plant where all mixtures are done. -Occupational Health and Safety (OHS) should be enforced by the contractor at	-GBoS office will install CCTV during project implementation for security purposes. -The contractor will hire a safety officer on site who will work on the safety precautions before any activity start -The OHS clauses will be added in the Bidding

Stakeholder	Stakeholders' comment	Recommendations of Stakeholder to the project	Action (s) to be taken by the project
	properly fixed to avoid falls/accidents. -	all times during the works and this will be monitored by the consultant -When using cranes to lift materials, they have to be carefully	document of the contract for the contractor to implement it. -Every morning the Safety Officer hired by the contractor will conduct toolbox's training for safety measures in order to avoid such accidents
WAIS JUNIOR	-Noise from project activities can interrupt students' learning Students with Asthma can be affected by the dust	Heavy work should be scheduled in the afternoon.	This concern will be considered during project implementation so it will be incorporated in the planning activities
Ministry of Gender, Children and Social Welfare	- Child labor and child exploitation as areas of concern. - Women can be exploited sexually and financially since they can be drawn to offer services to workers which are usually verbal.	Hold continuous sensitizations for workers so they can know the implications and avoid such circumstances.	There will be routine trainings for workers on Codes of Conduct and expected behaviors and sanctions; training on relevant laws on this including child labor, sexual exploitation, GBV, etc.
Street Vendors around GBoS			
Vendor Name	Designation	Concerns	Recommendations
Ms Matty Sanyang	Food Seller	<ol style="list-style-type: none"> 1. Air Pollution 2. Noise Pollution 3. Possibility of relocation due to construction/ rehabilitation activities. 4. Possibility of sexual harassment. 	<p>Measures should be put in place to reduce both air and noise pollution to a minimum.</p> <p>In the case of relocation, the affected individual should be informed and aided in looking for an adequate replacement location.</p> <p>The workers need to be oriented on the causes and effects of SEA/SH.</p>
Mr Ousman Sonko	Detergent Vendor		
Ms Fatou Sarr	Food Vendor		
Mr Babucarr Sawaneh	Shop Keeper		
Mr Momodou Sowe	Shop Keeper		

The list of representatives consulted is in Annex 2.

6 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND RISKS AND MITIGATION MEASURES

Environmental & Social risks and Impacts

Upon completion of the Environmental and Social Assessment, the Project was classified as Category B, under the national regulation, meaning no significant impact to the Environment or Social life is envisaged from the implementation of activities. The purpose of the screening was to: (i) determine whether activities are likely to have potential negative environmental and social risks and impacts; (ii) identify appropriate mitigation measures for activities with adverse risks or impacts; (iii) incorporate mitigation measures into implementation of the activity; and (iv) establish environmental and social monitoring mechanism as well as capacities development for stakeholders.

6.1 Methodological Approach

Identification of Potential Impacts and Risks of the Project on the Environment

Potential impacts, either positive or negative, are the likely changes to occur on the environmental and social components because of Project implementation. Sources of these impacts include all project-related activity, carried out during any of the different phases of implementation, which generate these changes (Table 6-3). Table 6-1 identifies the environmental and social components likely to be affected whilst Table 6-2 lists the major potential risks and impacts for the Rehabilitation of GBoS Office Complex under the HISWACA – SOP1 Project.

Table 6-1: Environmental and Social Components likely to be affected by the Project

Physical	Human
<ul style="list-style-type: none"> Noise Air quality 	<ul style="list-style-type: none"> Public and workers' health and safety Labor-related issues Vulnerable groups (People with disabilities, vendors including women and old people)

Project implementation may affect the different environmental and social components as listed in the following table:

Table 6-2: Potential Environmental and Social Impacts of the Project

Environmental Risks and impacts	Social Risks and impacts
<ul style="list-style-type: none"> Interruption of drainage systems Generation of all manner of solid and liquid wastes. Electrical and electronic waste Noise and Vibration during civil works. Air Quality Deterioration (Dust Pollution) Waste dumping Damage to infrastructure and public utilities. 	<ul style="list-style-type: none"> Violence Against Children (VAC). SEA/SH from workers coming from outside GBOS. Discrimination in the recruitment of workers. Risks of non-payment for services rendered by workers to the contractor. Risks of child labor when children below the minimum age for employment are used as temporary replacements for workers.

Environmental Risks and impacts	Social Risks and impacts
<ul style="list-style-type: none"> Improved working environment for GBoS staff. 	<ul style="list-style-type: none"> Temporary employment and income-earning opportunities for workers.

6.2 Evaluating the Significance of Potential Impacts

To ensure that the limited resources are used optimally to mitigate (prevent, reduce, repair, or compensate) the potential impacts, it is important to identify which impacts are more significant for adequate consideration. The parameters used to assess the significance of an impact include intensity, extent, and duration.

Nature of an Impact

- Negative impacts create adverse changes that destroy or degrade the receiving environmental and or social component. Negative impacts are undesirable as project development is expected to improve biophysical and/or socioeconomic environments.
- Positive impacts as result of the project activities are changes that are beneficial and improve quality of the related environmental and social components.

Types of Impacts

- **Direct or primary impacts** are those impacts that are created due to changes to the immediate environmental and social component by the Project activities. There is clear causative link between the activity and the component.
- **Indirect impacts** are usually secondary in the sense that the correlation between the activity and the environmental and social component are not readily noticeable and may not necessarily be on the same site. For example, construction works will attract workers who may interact with the women and girls in the community, and this may lead to spread of sexually transmitted diseases, gender-based violence, sexual harassment or sexual exploitation and abuse, which can affect community health and stability.
- **Cumulative impacts** can be defined as changes to the physical environment and social environment caused by the combined impact of past, present, and future human activities and natural processes. The potential cumulative impacts of this Project are very low, nonetheless, they are also analyzed as the Project may exacerbate effects as a result of a combination of issues from activities of the past, present or future, including natural phenomena. The distribution of such impacts may be only local on this type of Project. Consideration of cumulative impacts may include combined effects of:
 - one activity on existing/previously affected parameter
 - many activities of the same project on various parameters/sites
 - many projects impacting the same parameter
 - many projects impacting multiple parameters

6.3 Evaluation of Impact Severity / Significance

The impacts were weighed based on considerations such as duration of the impact, the magnitude in relation to the total affected area, geographical scope, and population amongst others.

The relevance and importance of the impact to the component is also given consideration. Sensitivity and vulnerability of the component, such as protected habitats or impacts on women respectively, are analyses in addition to assessing the probability of the impact occurring and possibility of prevention, reversibility, or other mitigation measure.

6.4 Positive Environmental and Social Impacts

Overall, the HISWACA – SOP1 is likely to have a positive impact on the socio-economic development of The Gambia and to improve statistical performance, regional harmonization, data access and use and to enhance the modernization of the statistical system in the country and region (West Africa).

Some of the positive impacts include:

- Construction of sanitation facilities would create improved disposal of human waste and improved hygiene which could reduce the transmission of water related diseases such as diarrhea. This development would positively impact on the administration and other officers who work at GBoS.
- Temporary employment during works and operation with its associated social benefits such as better living standards
- Increased access of temporary income generation opportunities for women through petty trading targeting Project workers.
- Improved and Standardized Data Collection System and housing infrastructure.

6.5 Negative Environmental and Social impacts and Mitigation Measures

A summary of the major negative environmental and social impacts of the construction component is provided in Table 6-3 below. These negative impacts can arise before, during and after rehabilitation/construction and provision of furniture and equipment. The environmental and social screening conducted ensures that the potential negative impacts are identified, and appropriate mitigation measures instituted as recommended in the table.

The Contractor's Environmental and Social Management Plan (C-ESMP) will be required by the Contractor to ensure that the rehabilitation/construction activities are carried out in compliance with the mitigation measures proposed in this ESMP. These guidelines will be included in the contractual agreements and form the basis for monitoring compliance.

Some adverse impacts such as community exposure to project-related traffic and road safety risks, risks related to SEA/SH because of external worker influx into the GBoS premises, female beneficiaries and workers may be at risk of GBV, including SEA/SH. There are also risks of discriminating against vulnerable groups, such as women, in terms of employment opportunities on the work. With respect to persons with disabilities, there is the risk of lack of access to communication of information about the project in languages or formats that meet their needs. During consultation, some members of the community might require special needs and will need access to communication so that they are not excluded.

Direct impacts include OHS and community health and safety related to possible COVID-19 transmission, sexually transmitted diseases, and accidents at work. The mitigation measures contained herein must also be reflected in the C-ESMP, including sensitization measures for works on proper PPE use, the availability of PPE by the contractor, training on the Code of Conduct, among other measures.

A: Environmental impacts: Potential negative impacts and mitigation measures

i) Air quality impacts

The rehabilitation/construction activities will create dust pollution. The likely nuisance will be confined to the site locality and of short-term nature.

Mitigation

Access to the rehabilitation/construction site must be controlled, particularly since the site is located in a built-up area. Construction materials must also be dispensed at strategic locations away from the office community activities. It will also be necessary to:

- Monitor the wearing of protective equipment and awareness campaigns.
- Regularly maintain equipment and construction machinery.
- Carry out watering.
- Wearing dust masks for site personnel
- All aggregates need to be sieved before being transferred on site or even have a concrete batching plant where all mixtures are done.

ii) Geology and Soils

Sand and gravel to be used for construction of infrastructure may be mined illegally from unapproved sites causing secondary negative impacts on landscape and vegetation. Also, soil pollution may emanate from machinery (leaks from vehicles, machine, generators etc.) especially when they are not properly maintained.

Mitigation

- The Contractor must be cautioned through the clauses in the contract to use only certified sand and gravel suppliers that have been approved by the NEA and Geology Department.
- Regular maintenance of vehicles and machinery being used during the works.

iii) Improper Waste Management

Improper waste management of PPE disposal and other hygiene materials (gloves, masks, goggles, reflectors etc.) can cause contamination.

During the works and operation, organic wastes, solid wastes, e-wastes, hazardous waste, unused construction materials, packaging material are usually abandoned around sites creating eyesore and health risks.

Mitigation

All excess materials and waste produced in the process of construction and installation must be collected and sorted for appropriate disposal. Some waste materials such as packaging and rubble may have other uses and shall be given to workers or members of the community for reuse. Unwanted waste should be disposed of safely.

iv) Noise and vibration

Noise is inevitable from the use of trucks to transport materials and the use of equipment during construction activities. Workers are generally those who are primarily impacted, as well as nearby shops, vendors, offices and schools close to the site.

Mitigation

The Contractor must be cautioned through the clauses in the contract to use appropriate truck to transport material and to carry out such activities only during the evening (4pm – 10pm) to minimize the distraction of school and office work. Workers will also be provided with adequate PPE including ear covers when necessary.

B: The Socioeconomic Environment: Potential Negative Impacts and Mitigation Measures

i) Negative Impacts on Public Health and Safety

During construction and installation activities of the civil works, there is risk to public health and safety. Community members, staff, and students from a school near the site in particular, are at risk of accidents from the equipment, traffic and improperly handled, placed, or temporarily stored materials. Waste produced during works can also be a health and safety hazard to the surrounding offices and school community around the Project site.

Mitigation

Access to the work site must be restricted to avoid accidents and theft incidents. Activities must be well coordinated by the Contractor with monitoring done by the GBoS PIU E&S Safeguards Team to prevent accidental destruction of property through invasion by equipment and machinery. Waste and disused infrastructure should be removed from the Project site whenever produced. Safety signs and symbols shall also be used at strategic locations.

All workers will be educated on the risks and prevention of sexually transmitted infections/diseases.

Awareness-raising will also include dissemination of information around GBV, SEA/SH, and VAC risks, including information on prohibited conduct, available services, and related complaint procedures. This is also an important measure to avoid social conflicts. Workers will also undergo regular training and awareness raising of the Code of Conduct and be aware of sanctions for violations. The contractor must enforce adherence to the Code of Conduct, and all new project workers will receive induction training on its content and signed by them. The Project will monitor its implementation. A sample Code of Conduct is included as Annex A of the Grievance Mechanism.

ii) Negative Impacts on Health and Safety of Workers

There is risk of health and safety issues for workers during construction. Hazards include fumes, working with heavy equipment and parts, loud noise, road traffic accidents, chemical handling.

Mitigation

Workers must be informed of the associated hazards and risks; training on the job and knowledge on procedures to reduce risks, including coordination and communication to avoid accidents, as well as information on prohibited conduct regarding sexual harassment, available services, and relevant

complaint procedures. Fire extinguishers, personal protective equipment and first aid kits should be provided, and training given on how to use them. Reporting of incidents is also essential for the review and improvement of safety procedures.

iii) Negative Impacts on the Affected Community

The Contractor will make sure that workers do not reside on site to mitigate the risk of SEA/SH. No temporary accommodation on site. The Project must ensure proper sensitization to avoid competition for food, water between the contractor's staff and staff at the GBOS office and the local community.

Mitigation of Risks of COVID-19 and other Communicable Diseases

Most of the unskilled workforce shall be sourced locally (in KMC) to reduce the need for importation of workers, they will also be residing in their own homes. This can enhance community cohesion as the local workers know the community, culture, and norms, which may also help decrease risks of GBV, SEA/SH as well as the spread of STDs and other communicable diseases such as COVID-19.

- Nonetheless, to prevent STDs and COVID-19, as well as mitigate risk associated with SEA/SH, it is essential that Contractors are required through the contracts to educate their workers on the risks and prevention methods before, and regularly during works.
- Similarly, measures to educate and sensitize both workers and community members on the dangers as well as mitigation measures related to the prevention of acquiring STIs will be implemented.
- There will also be strict monitoring to ensure adherence to the relevant Code of Conduct (COC). The COC shall specifically prohibit SEA/SH, including any sexual relations with local community members, and establish applicable sanctions for any infractions.
- Other mitigation measures include:
 - Ensuring the Contractor routinely review the Code of Conduct, as well as the Action Plan for Implementing ESHS and OHS Standards, and any relevant provisions under the Project's SEA/SH Prevention and Response Action Plan, with Project workers.
 - mandatory reviews with new workers to the Project site to ensure all workers understand behavior expectations and SEA/SH risks. The Social Specialist of the Project will attend sensitization meetings to ensure they are taking place. The Code of Conduct is meant to:
 - Create awareness of the ESHS and OHS expectations on the project
 - Create common awareness about SEA/SH and VAC, as well as the grievance mechanism and the procedures for filing complaints related to SEA/SH
 - Ensure a shared understanding that SEA/SH and VAC have no place in the Project through inclusive and transparent consultation and the implementation SEA/SH action plan which is approved by the World Bank.
 - Create an ethical, safe and confidential handling of responding to and processing SEA/SH and VAC incidents.

iv) Discrimination of Women in Job Recruitment and Impacts on other vulnerable groups such as persons with disabilities

There is the risk of discriminating against vulnerable groups, such as women in the recruitment of workers at the construction site. With respect to those workers with disabilities, there could be adverse impacts on their ability to communicate as access to communication of information in a language or

format that they can understand is not available. This also includes those with low levels of literacy. In addition, during consultation, persons with disabilities present may not understand messages being conveyed due to lack of adequate accessible materials.

Mitigation

Ensure that the recruitment process is fair and transparent, giving equal opportunity to all applicants and that information about the vacancy is accessible to all in a timely manner. For project communication (both for the workers and the community members), information should be given in the relevant language and in an accessible format, which also includes considering the needs of those who are speech, sight, or hearing-impaired. Measures to mitigate SEA/SH risks should also be taken into account, including a code of conduct, relevant awareness-raising and training, and information around complaint procedures.

v) Risk of Child Labor and Forced Labor

In the Labor Act, 2007, the age of employment for children is 18, although they can be employed for light work at 16. Contracts for services, such as providing water for the project, may include risks of child labor for minors below the age of 16, including when the parent contracted is unavailable for work, he/she may ask her child to work in his/her place during his/her absence.

Mitigation

The contractor should ensure that any person working or providing services complies with all relevant labor legislation, including labor laws in relation to child labor, by verifying documentation of all those applying for work, and World Bank's E&S standards on child labor and minimum age. Any temporary replacement should meet the age requirement and must also sign and be trained on the Code of Conduct. The E&S safeguard team will make sure during monitoring that all those working on site have their documents with their age clearly indicated to ensure that the workers are above 18 years. Child from 16 to 18 years may be employed only under the following specific conditions:

- (a) The work is not hazardous, harmful to their health, or impacts on a child's ability to attend school.
- (b) An appropriate risk assessment is conducted prior to the work commencing.
- (c) the PIU needs conducts regular monitoring of health, working conditions, hours of work, etc.

vi) Risk of non-payment work/services rendered by workers

There is a risk that the contractor may refuse to pay workers and service providers for their labor and other abusive labor practices particularly towards the end of their work.

Mitigation

Workers will have a valid employment contract and be sensitized adequately about the worker's grievance mechanism (how to lodge complaints) and worker's rights under the country's labor code/policies. They will be encouraged to report such cases to the Grievance Redress Committee (GRC on Annex 1) before the contractor leaves the site upon completion of the works. Lack of conformity regarding fair labor practices will be subject to a fine or deduction on a submitted invoice.

Table 6-3: Potential Negative Impacts and Mitigation Measures for the infrastructural component of the HISWACA – SOP1 Project

Phase		Potential impacts	Mitigation measures	Budget (\$US)
Pre-rehabilitation (transportation of materials, demolition of broken surfaces, removal of old flooring and plumbing materials)	Environmental	Using uncertified gravel and sand for construction	The Contractor must be cautioned through clauses in the contract to use only certified sand and gravel suppliers that have been approved by the Geology Department.	
		Accumulation of waste and debris during pre-rehabilitation activities	Dispose of waste generated from demolishment activities and excess materials at authorized landfills	
		Dust and air pollution	Covering of bulk material during transportation and watering the access roads to the site	
	Social	Disruption of community life resulting in community hostility	Undertake adequate sensitization of the workers about the expected standard of behavior in GBoS and surrounding community prior to the start of civil works.	
		Contamination may spread offsite through air or improper disposal of waste	Ensure that proper disposal methods for waste are in place before the start of the rehabilitation/construction works	
		Risks of conflict between the GBoS and local community as a result of SEA/SH and VAC risks	Sensitization of workers about the project's zero tolerance for GBV, VAC, SEA, SH. A Code of conduct must be enforced and monitored (See Sub-Annex A under Annex). Managers and staff must sign the code of conduct before the works start and these will be explained to the workers through awareness raising workshops, including information on SEA/SH complaint procedures.	
		Risks to public health and safety during implementation of activities from SEA/SH, COVID-19	Initiate sensitization programs for GBoS and workers on the risks of COVID-19 infection and the health guidelines on wearing masks and hand washing. They will also be	

Phase		Potential impacts	Mitigation measures	Budget (\$US)
		and other infectious diseases. Contamination of STD/STIs and COVID-19 to workers.	sensitized on the dangers and mitigation measures to address STD/STIs.	
Rehabilitation	Environmental	Degradation of storage sites of construction materials and equipment	Regular collection and evacuation of work site refuse in authorized dumps	
		Air pollution due to vehicle rotation during delivery of materials, noise, dust etc.	Put in place safety measures to reduce vehicle rotation and water the main road routes used by vehicles around the GBoS premises to reduce dust.	
		Pollution and noise nuisances; degradation of the living environment	Put in place a system to reduce noise and sensitize the operators of these engines to schedule such works for evening when the everybody has gone home.	
		Air pollution during the burning of some work site wastes (wheels, papers, etc.)	Ensure that burning of refuse will not take place.	
	Social	Risks of accidents at work sites and in the community during working hours	Conduct awareness raising campaign for the worksite staff. Establish speed limits for delivery vehicles travelling through communities.	
		Risks related to SEA/SH at the work site and between workers and community members	Establish and require workers and project personnel to sign a code of conduct prohibiting SEA/SH and outlining sanctions. Establish project grievance mechanism for project workers with specific procedures to manage SEA/SH-related complaints ethically and confidentially, including response protocol with appropriate service referrals. -Train workers and project personnel on SEA/SH, prohibited behaviors, sanctions, and GM procedures. -Create female-friendly work environment with safe	

Phase		Potential impacts	Mitigation measures	Budget (\$US)
			<p>discussion spaces for women and targeted hiring of women in non-traditional roles and supervisory positions on the work site, as well as appropriate sanitation facilities that are sex-segregated, secure, and well-lit.</p> <p>-Include SEA/SH mitigation measures in all bidding documents and vendor contracts, including for supervision consultants.</p> <p>-Ensure that the successful contractor hires a Social Specialist (part-time) with GBV and/or gender background to monitor SEA/SH risk and implementation of associated risk mitigation measures.</p>	
		<p>Risks to public health and safety during implementation of activities from COVID-19 and other infectious diseases. Contamination of SDT/STIs and COVID-19 to workers.</p>	<p>Initiate sensitization and education programs for the workers on the risks of COVID-19 infection and the health guidelines on wearing masks and hand washing.</p>	
		<p>Non-use of local workers</p>	<p>Prioritize hiring local labor and ensure transparent and fair hiring practices, including the recruitment of women, and in non-traditional and supervisory roles where possible</p>	
		<p>Disturbance of nearby institutions and a school surrounding the site during works.</p>	<p>Arrange to have truck deliveries after learning and working hours, in the evenings or on weekends and select work periods to avoid as much as possible periods of 'offices' work or classes.</p>	
		<p>Disturbance of the circulation of goods and persons by the engines, the storage of materials at the GBoS Premises</p>	<p>Design traffic deviation plans approved by the concerned authorities; Make careful selection of an installation site.</p>	

Phase		Potential impacts	Mitigation measures	Budget (\$US)
		Risk of child labor which may have an impact on the education of the child.	Contractor to ensure that any person working or providing services is above the minimum age of 18. Similarly, any temporary replacement should meet this condition and proof of age should be provided i.e., birth certificate/ national ID and shall receive training on the Code of Conduct and COC signed.	
		Risk of non-payment of work/services rendered by workers	Ensure that there is a valid contract for the work and that workers are adequately sensitized about the grievance mechanism, on how to lodge complaints and encourage them to do so for such cases. In case of non-compliance, invoices from the contractor will be blocked until proper correction is done. Works can be suspended if necessary.	
		Risk discrimination against vulnerable groups, including women, children, and people with disabilities	Ensure that the recruitment process is fair and transparent giving equal opportunity and that vacancy announcement is accessible to all in a timely manner. For information access, provide information to workers in the language they understand and in a format that is accessible. SEA/SH risks must also be addressed for the same vulnerable groups, including application of the same mitigation measures cited above under community health and safety risks.	
Post rehabilitation	Environment	High cost of building materials to sustain the state of the facility and its environment long term.	A yearly budget should be made available to GBoS by the Ministry of Finance and Economic Affairs to ensure maintenance is consistent.	

Phase		Potential impacts	Mitigation measures	Budget (\$US)
	Social	Nonpayment of work and services rendered to the contractor	Ensure there is a valid contract with the workers and ensure that all such liabilities are cleared before the final payment of the contractor. In case of non-compliance, final invoice from the contractor will be blocked until proper correction is done. Works can be suspended if necessary.	
		Risks related to SEA/SH at GBoS and between staff	Include SEA/SH mitigation measures in all contracts, including for consultants.	

Environmental mitigation and monitoring will be carried out to ensure that various mitigation measures are implemented during different phases of the project life cycle and are properly monitored. The mitigation measures proposed during various phases of construction life cycles are given in the ESMP Monitoring Program stated in Chapter 7, Table 7-2 below. The program provides details of various social and environmental impacts in different phases of the rehabilitation sub-project, proposed mitigation and monitoring as well as person(s) responsible for the same and frequency of mitigation and monitoring measures. Effective implementation and follow up of the program are the spirit of the entire efforts to add value to the natural and social surroundings and is required to be holistically followed by the respective personnel. The Program must be part of the bidding documents and subsequent contract agreement, so that its implementation is ensured at all stages.

7 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

7.1 ESMP Implementation and Monitoring Arrangements

Roles and Responsibilities for ESMP Implementation

The Gambia Bureau of Statistics (GBoS) will be the implementing agency of the project through a PIU that will be established within GBoS and charged with the responsibility of implementing the activities of the project. GBoS will be responsible for the fiduciary aspects of the project. Implementation of this ESMP is the responsibility of the GBoS and the PIU. However, mitigation measures with respect to civil works activities will be the responsibility of the contractor, and the PIU and GBoS will monitor and supervise. GM operation is the responsibility of the PIU. Regular monitoring of the implementation of the ESMP will be conducted by NEA.

During the implementation of the Sub-project, the Contractor will prepare a Contractor's Environmental and Social Management Plan (C-ESMP) along with the OHS implementation plan upon mobilization, which will be reviewed and approved by the PIU. The Contractor will also have a qualified environment/OHS specialist to implement the ESMP and social specialist. The Supervision Engineer will be responsible for overseeing the implementation of ESMP and issuing non-compliance notice to the contractor in the event of non-compliance.

The PIU and GBoS will be responsible for follow-up, and to ensure that the ESMP is fully implemented with the support of the Environmental Safeguards Specialist (ESS) and Social Safeguards Specialist (SSS) who during field activities will work with the regional Community Liaison Officers (CLOs) to be recruited by GBoS. E&S Clauses will be included in the bidding documents and the Contractor's agreements that will ensure compliance and coordination with the GM, among others.

The local community will also have the responsibility of ensuring that the staff of nearby institutions, students and members of the community avoid the work site and report to GBoS or relevant authorities, issues of concern related to the Project; the PIU, GBoS and Contractor will engage the Project affected People regularly as an oversight measure in this regard and conduct sensitization sessions to ensure that the community is aware of reporting measures and understand Project risks.

As the Secretariat of the EIA Working Group, and supported by its members, NEA will be responsible for the overall external monitoring of the ESMP implementation. In collaboration with the PIU ESS and SSS, they will monitor compliance with the World Bank policies as they relate to the environmental and social aspects of this Project. In addition to the permanent members in the EIA Working Group, other institutions on an *ad hoc* basis will include those specialized in social aspects such as the Women's Bureau, Department of Social Welfare, Department of Labor, and Department of Health Services, amongst others. Meanwhile, monitoring of the implementation of the social aspects of the Project in line with the World Bank's E&S safeguards instruments will be the responsibility of the PIU SSS and the GBV Specialist who will recruit at their level.

The local Authorities and beneficiary community members will be relevant during the project cycle, as they can provide valuable information to assist in the planning of the works.

The breakdown of the institutional arrangement for the ESMP implementation is as follows:

a) Project Implementation Unit (PIU) & Gambia Bureau of Statistics (GBoS)

The GBoS Staff and PIU staff that will be involved in the implementation of the ESMP will include the following, among others:

- Project Coordinator - PIU
- Monitoring and Evaluation Specialist - PIU
- Environmental Safeguards Specialist (ESS) - PIU

- Social Safeguards Specialist (SSS) - PIU
- Procurement Specialist - PIU
- Financial Management Specialist - PIU
- Gender Based Violence Specialist - PIU
- Statistician General – GBoS
- Director of Social and Demographic Statistics (DSDS) – GBoS
- Director of Coordination, Statistical Methods, Quality Assurance & Dissemination – GBoS
- Director of Economic Statistics – GBoS
- Director of Information Technology (IT) - GBoS

The PIU and GBoS will oversee the implementation of this sub-project, including the C-ESMP. Their other responsibilities will include:

- Ensuring alignment of the environmental and social safeguards standards applied to the Project.
- Working with the procurement teams to ensure that bidding and contract documents contain environmental and social safeguard clauses that the Contractor must fully implement, including provisions related to mitigation of SEA/SH risk.
- Coordinating internal monitoring and evaluation of the C-ESMP based on monitoring plans.
- Coordinating Project-related grievance redress activities, including GM procedures for the management of SEA/SH-related claims and;
- Where applicable, facilitating Project related activities of partner stakeholders.

b) Specific Roles and Responsibilities of Project Personnel

i) Project Coordinator (PC) – PIU & Statistician General (SG) – GBoS

The PC-PIU and SG-GBoS will oversee the implementation of the sub-project, and consequently the ESMP, and will have the responsibility for ensuring that implementation of the ESMP is carried out as required under the national law and the World Bank's Procedures.

ii) PIU Environmental Safeguards Specialist (ESS)

The ESS is responsible for validating the ESMP and obtaining the environmental compliance certificate and publishing the ESMP. The ESS will make sure that all environmental measures outlined in the ESMP are integrated in the bidding documents and in the companies' contracts. He or She will also be responsible for the approval of the contractor's ESMP.

The ESS will provide day-to-day management of all environmental issues and activities including the implementation of the ESMP. He or She will also directly oversee the implementation of the capacity building of stakeholders on environmental and social safeguards.

iii) PIU Social Safeguards Specialist (SSS) & PIU Gender Based Violence Specialist (GBVS)

The SSS and GBVS will make sure that all social measures outlined in the ESMP are integrated in the bidding documents and in the companies' contracts, including those related to SEA/SH risk mitigation. The SSS and GBVS will provide day-to-day management for all social issues as they relate to implementation of any labor issues, and social inclusion, including in relation to SEA/SH risk; prepare periodic reports on progress of social issues.

The SSS and GBVS will directly oversee the implementation of the capacity-building of stakeholders on the GM and the implementation of all risk mitigation measures under the sub-project's SEA/SH

Prevention and Response Action Plan, including code of conduct that address GBV, including SEA/SH and VAC, appropriate GM procedures and associated response protocol, and related trainings and awareness-raising activities.

The Social Safeguards Specialist and Gender based Violence Specialist will both have a background on gender and/or GBV prevention and response programming in order to assure a basic understanding of SEA/SH risk and the related mitigation measures to be put into place.

Table 7-1: Summary of Roles and Responsibilities for ESMP Implementation

No.	Steps/Activities	Responsible	Collaborating Partners	Service Provider
Preparation of the Project activities documents etc. in accordance with the national legislation / procedure and the World Bank's policy guidelines				
1	Report validation and issuance of the permit (when required)	PIU ESS/SSS; PC - PIU/SG -GBoS	NEA	PIU/GBoS
	Disclosure of the document	PIU ESS/SSS; PC - PIU/SG -GBoS	PIU ESS/SSS; NEA WB	Consultant; World Bank
		PIU ESS/SSS	NEA; GBoS	GBoS and the PIU; also disclosed on the World Bank's external website
2.	(i) Integrating the mitigation measures of the planned activities and E&S clauses in the bidding document prior to being advertised, including provisions related to SEA/SH (ii) ensuring that the contractor integrates relevant ESMP measures in the activities, including those related to SEA/SH	PIU ESS/SSS/GBVS/PS; PC - PIU/SG – GBoS	PIU ESS/SSS/GBVS/PS; PIU, GBoS, SG – GBoS, PC - PIU; Contractor	Contractor; NEA
3.	Implementation of the other safeguards' measures, including environmental and social monitoring (when relevant) and sensitization activities, taking into account SEA/SH risk	PIU ESS/SSS/GBVS	NEA and EIA Working Group; PIU; GBoS; General public WB	Consultants; Other relevant public institutions
4.	Oversight of safeguards implementation (internal)	PIU ESS/SSS; PC - PIU/SG - GBoS	PIU, GBoS	GBoS Management
	Reporting on project safeguards performance and disclosure	PC - PIU/SG - GBoS	PIU ESS and SSS	GBoS Management

No.	Steps/Activities	Responsible	Collaborating Partners	Service Provider
	External oversight of the project safeguards compliance and performance	EIA Working Group/NEA	PC-PIU; SG-GBoS; PIU ESS; PIU SSS;	GBoS Management
5.	Building stakeholders' capacity in safeguards management	PIU-ESS; PIU-SSS; PIU - GBoS	PC-PIU; SG-GBoS; NEA	PIU Safeguards Team; Other qualified public institutions

Monitoring

Once the sub-project commences, including implementation of accompanying mitigation measures, monitoring must be carried out by the different stakeholders to ensure effectiveness in maintaining environmental and social sustainability. Monitoring will act as an oversight mechanism to ensure that the mitigation measures are enforced. The monitoring will include activities that have been identified above which have potential negative impacts on the environment and socio-economic parameters, and for which the corresponding mitigation actions have been developed. Routine monitoring may also identify new issues that have risen due to changes (at the site, or in sub-project design or activities) that will need alternative mitigation measures. Thus, appropriate mitigation will be developed accordingly.

Internal monitoring will be the responsibility of the Environmental Safeguard Specialist (PIU), Social Safeguard Specialist (PIU) and GBV Specialist (PIU) within the PIU and GBoS to ensure compliance with national laws and procedures and the World Bank's safeguards policies. With regards to transmission diseases, they will also monitor to ensure that WHO and national guidelines are followed and updated accordingly, and practices revised as the situation evolves. Any monitoring related to SEA/SH and VAC risk and complaints must adhere to international best practices and norms regarding the confidential management of SEA/SH case and survivor data as well as the World Bank's Good Practice Note for "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Major Civil Works".¹⁰

The recommended arrangements and roles for implementing the ESMP will also be evaluated for completeness, and improvements suggested where necessary.

The NEA and other relevant institutions identified in the ESMP will monitor compliance with requirements under Gambian law. Furthermore, it will be more cost-effective and focused to use the members of the national EIA Working Group (in the Greater Banjul Area) to monitor the sub-project since it will be implemented in the Kanifing Municipality which is part of the Greater Banjul Area.

A monitoring plan with frequency and indicators is further outlined in Table 7-2.

¹⁰ WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies (2007); GBVIMS Best Practices <http://www.gbvims.com/wp/wp-content/uploads/BestPractices2.pdf>. World Bank (2020) "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Major Civil Works" (2nd edition). <https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf>

Table 7-2: ESMP Monitoring Program

No.	Environmental & Social Risk	Mitigation measures to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to Monitor	Monitoring frequency	Monitoring indicators
1	SEA/SH and VAC risk	<p>Sensitization of workers on SEA/SH and VAC and CoC. Workers should sign the code of conduct for prohibiting SEA/SH and VAC before start of work.</p> <p>Popularization of the GM (availability) and orientation of workers on the different uptake channels</p>	PIU & GBoS	SSS/GBVS with support from the Women's Bureau and Department of Social Welfare	Before & during project implementation	Quarterly	<ul style="list-style-type: none"> • No. of worker sensitization meetings on codes of conduct prohibiting SEA/SH and VAC • % Of workers and project personnel who signed code of conduct prohibiting SEA/SH and VAC • % Of workers trained on SEA/SH and VAC, codes of conduct, and GM complaint procedures • % Of workers trained who score above 70% on post-test • No. of independent consultations with female students and women in safe and enabling environments (with same-sex facilitators) and number of participants • No. of College and community sensitization meetings where GBV/SEA/SH and VAC risk and discrimination are discussed, including GRM complaint procedures and response to SEA/SH complaints • Number and type of complaints through the GM, including SEA/SH and VAC (there should be no target for SEA/SH and VAC complaints) • % of SEA/SH and VAC complaints referred for support services • % of SEA/SH and VAC complaints resolved within the prescribed delay under the GRM • % of SEA/SH and VAC complaints resolved outside of the prescribed delay under the GM • Average time for resolving SEA/SH and VAC complaints • Number and type of complaints relating to discrimination and exclusions from benefits and inequality (for example based on vulnerability such as sex, age, etc.) • Number of women hired in the Project and in which type of roles

No.	Environmental & Social Risk	Mitigation measures to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to Monitor	Monitoring frequency	Monitoring indicators
2	Transmission of COVID-19, communicable and non-communicable diseases	Public sensitization meetings and programs on WHO and national guidelines on the prevention of the spread of COVID-19, communicable and non-communicable diseases. Practicing social distancing of workers whilst on site. Provision of masks, thermometer and safe hygiene spaces for constant handwashing on site. Provision of access to medical facilities.	PIU & GBoS/ Contractor	SSS with support from the Ministry of Health	Before and during project implementation	Quarterly	<ul style="list-style-type: none"> • No. of sensitization meetings/programs for the College management community, lecturers, students and education personnel on mitigating the spread of COVID-19, communicable and non-communicable diseases. • No. of public sensitization meetings and programs on WHO and national guidelines on the prevention of the spread of COVID-19, communicable and non-communicable diseases. • Number of cases of COVID-19, communicable diseases registered among workers and members of the college and surrounding community.
3	Risks to exclusion of Women and youth (e.g., Discrimination in employment, exclusion during consultation)	Encourage women and youth participation during consultation. Arrange meetings during evening time to motivate more women to attend since they will be at work during the day.	Contractor, PIU, GBoS	SSS	Before and during works	One time before work and after activities start	<ul style="list-style-type: none"> • No. of independent consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of youth participating in consultations (male and female) • No. of youth employed by the Project (male and female) • No. of women to be employed during the works.
4	Labor influx risks on Children and vulnerable people	All workers should understand and sign the Code of Conduct which prohibits Chil labour and abuse. Sanctions	Contractor / PIU / GBoS	SSS/GBVS	Before and during project	Quarterly	<ul style="list-style-type: none"> • No. of reports of child labor / abuse • No. of women participating in consultations • No. of Community sensitization meetings where VAC issues are discussed • No. of meetings on GM relating to SEA/SH Complaints

No.	Environmental & Social Risk	Mitigation measures to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to Monitor	Monitoring frequency	Monitoring indicators
		should be taken against offenders. Sensitization meetings on GBV, SEA/SH, VAC and the GM should be conducted periodically for surrounding community including women.					<ul style="list-style-type: none"> • Completion rates signing CoC by workers. • Training of workers on CoC. • No. of reports of children involved in Project related accidents
5	Risks to Public and worker health and safety	Hiring of a health and safety officer on site and Provision of First Aid Box on site for workers. Weekly trainings on OHS should be conducted for workers by the health and safety officer. All workers using equipment should be adequately trained on how to use them and cleared by the health and safety officer. Daily housekeeping should always be encouraged on site. Sensitization meetings on GBV, SEA/SH and VAC should be conducted periodically for workers.	Contractor	ESS/SSS/GBVS /NEA Beneficiaries	Before starting of activities	Quarterly	<ul style="list-style-type: none"> • No. of accidents related to the Project activities • No. of health education / sensitization sessions, including on SEA/SH and VAC risk • No. of complaints /reports on lack of measures to address air polluting emissions • No. of protective gear provided to workers

No.	Environmental & Social Risk	Mitigation measures to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to Monitor	Monitoring frequency	Monitoring indicators
6	Improper waste management risk	Discourage waste dumping on and around the site. Sensitization meetings for workers on waste management. Develop Waste management plan for the site and make sure it is followed by the contractor.	Contractor	ESS/SSS/NEA	During activities implementation	Quarterly	<ul style="list-style-type: none"> • No. of waste dumping sites on and around the site. • No. of sensitization meetings on waste management. • No. of contracts that included waste management clauses • Waste management plan developed • No. of reports/complaints on waste management issues
7	Risk to Project sustainability/legitimacy regarding Community expectation on local labor employment	Employ workers from the local community so as to improve how they embrace the Project and also benefit from it. Have specific contract for each worker.	Contractor/ PIU / GBoS	ESS/SSS	Before and during activities implementation	Annually	<ul style="list-style-type: none"> • No. of people employed from the local community. • No. of contracts that specify use of local labor • No. of community conflicts because of Project.
8	Risks of exclusion or improper Consultation and lack of awareness of project activities to beneficiaries	Community consultative meetings for PAPs and interested parties. Apply culturally appropriate consultations with women and differently abled individuals in safe and enabling environments (with same-sex facilitators)	Contractor/ PIU/ GBoS	ESS/SSS	Before and during works	Annually	<ul style="list-style-type: none"> • No. of consultative meetings with beneficiaries • No. of independent culturally appropriate consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of complaints on lack of consultation • No. of minutes /reports of consultations • No. of persons in attendance

No.	Environmental & Social Risk	Mitigation measures to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to Monitor	Monitoring frequency	Monitoring indicators
		and number of women participants.					
9	Risk of lack of Social cohesion	Preference for employment can be given to local youths so they can participate actively in the project. Create project awareness meetings periodically for the surrounding community.	PIU/ GBoS/ community	PIU/GBoS	Before and during works	Quarterly	<ul style="list-style-type: none"> • No. of locals employed • No. of community conflicts
10	Traffic Risk	Training of Project workers (drivers) on traffic and road safety. Sensitization of the Communities on specific times which the roads will be used by the Project.	Contractor/ PIU/GBoS	PIU/GBoS	During the works	Quarterly	<ul style="list-style-type: none"> • Training of Project workers on traffic and road safety. • Sensitization of the Communities on specific times which the roads will be used by the Project. • No. of signages around the site and communities surrounding the Project area.

7.2 Reporting

As monitoring of the ESMP implementation falls under the general monitoring and evaluation system of the Project, its reporting should be synchronized. This will ensure efficient reporting and communication of the ESMP-related issues to all relevant stakeholders for holistic management, particularly where changes for improvement are recommended.

Two types of monitoring reports will be required from the Environmental and Social Specialists (and GBV specialists/consultants as required):

a. Monthly Progress Reports

Works Contractor and Consultant will submit Monthly Progress Report to the PIU with a section dedicated to progress on the implementation of environmental and social mitigation measures/plans outlined in the ESMP as well as environmental and social non-compliance issues and timelines for compliance, incidence/accident reports, the status of grievances received in the reporting month and emerging environmental and social issues, among others.

The report will also discuss mitigation measures for identified impacts and risks during the reporting month, such as ensuring site workers are in the appropriate PPEs, ensuring the sites have adequate warning and directional signs and appointment of dedicated persons to enforce environmental, social, labor, health and safety laws and protocols as well as sanctions for non-compliance. The report will also include information on toolbox training, including training on SEA/SH, the total number of workers and the number of workers who have signed their Code of Conduct.

Sub-project Consultant (Supervising Consultant) will be responsible for ensuring compliance as specified in the ESMP and preparation of Monthly Progress Reports on the sub-project. Implementing corrective/mitigation measures and ensuring compliance with mitigation measures in the ESMP shall be the responsibility of the Contractor.

b. Quarterly Reports

The Environmental and Social Specialists (including the GBV Specialist) domiciled in the PIU will prepare a summary of project related E&S issues every quarter in a report as per the ESCP and submit it to the World Bank. This quarterly report will cover the following issues; progress of physical works in terms of new construction/rehabilitation progress on OHS and COVID-19 mitigation measures, SEA/SH awareness sensitization/ training, E&S impacts and risks associated with sub-project implementation, stakeholder engagement activities associated with the performance of the Grievance System (Grievance Logs), challenges as well as the environmental and social performance of the contractor implementing the sub-project.

The PIU will submit quarterly monitoring reports to the World Bank.

7.3 Capacity Development

The ESMP also identifies the capacity development needs for its effective implementation. For this purpose, the PIU and GBoS will arrange/coordinate environmental and social trainings for its Environmental and Social Specialists (ESS) and GBV Specialist respectively. In addition, capacity development would also be needed for the relevant officers/staff of the Project Directorates and relevant GBoS officers to ensure sustainability of E&S Safeguarding for the project. The contractor will be responsible to conduct such training for their own staff. Training regarding SEAH, codes of conduct, GM will be implemented by the PIU. The various costs attached to capacity building for this sub-project is in section 7.5 below.

7.4 Environmental and Social Auditing

According to Part VI of the EIA Regulations, 2014, environmental audits should be carried out by the Project and the NEA. A systematic environmental and social audit (at mid-term and end of the Project) shall evaluate compliance with expected risks and impacts of the project and shall revise should new risks and impacts arise. It will also evaluate the level of and quality implementation of proposed mitigation measures. The audit, which will be done internally by the safeguard team, and externally by NEA or a third party, may also identify potential impacts that have arisen due to any modification in planned design or activities, or changes to environmental and social parameters.

The Project may carry out self-audit by the Environmental and Social Safeguards Specialists to include review of its activities, the Project ESMP implementation, monitoring reports and any subsequent improvement measure, capacity, and communication between the affected stakeholders amongst others.

Whilst the self-audit is a routine activity of the PIU E&S specialists, an independent environmental and social audit will be carried out midway during implementation of the ESMP and upon project completion, preferably by an external auditor to avoid conflict of interest.

Environmental Inspectors of the NEA are also empowered to carry out audits in their own time, with the aim of confirming that all mitigation measures are complied with, and any breach pursued for appropriate redress.

7.5 Budget for Implementation of the ESMP

The proposed budget for implementation of the ESMP is US\$ 183,000 as indicated in Table 7-3 .

Table 7-3: Estimated Budget to Implement the ESMP

No.	Activity	Time Frame	Expected Outcome	Budget (US\$)	Responsibility to coordinate
1	Capacity Building				
	Workshop to strengthen the capacity of the EIA Working Group in managing issues regarding environmental and social safeguards on ESIA, including on SEA/SH	First quarter of the Project implementation	<ul style="list-style-type: none"> Relevant EIA Working Group members oriented on Environmental and Social Safeguard policies that are relevant to the project. Issues of SEA/SH understood. 	1,000	NEA/PIU/GBoS/ESS/SSS /GBVS
	Capacity building of GBoS Management	First quarter of the sub-project implementation	<ul style="list-style-type: none"> Environment and Social risk management issues understood, including ESS and ESF. Roles and responsibilities of GBoS staff in the implementing the ESMP understood. 	5,000	GBoS Management / PIU
	Capacity building of Relevant Safeguards Implementers (PIU Safeguards Team)	Annually	<ul style="list-style-type: none"> Capacity enhancement in ESIA Procedures. Improve and create awareness of Safeguards management procedures. 	30,000	GBoS Management / PIU
Capacity building of relevant GBoS staff and stakeholders on environmental and social safeguards and their roles, including responsibility for SEA/SH risk	Annually for GBoS staff and five (5) times for GBoS Stakeholders (includes consultation on the development of Safeguards tools)	<ul style="list-style-type: none"> Project components and related activities known Capacity enhanced in ESIA Procedures ESMP requirements understood Roles and responsibilities of stakeholders with regard to the ESMP understood Plan for enforcement of the ESMP developed 	10,000 for GBoS Staff 5,000 x 5 = 25,000 for	GBoS Management / PIU	

No.	Activity	Time Frame	Expected Outcome	Budget (US\$)	Responsibility coordinate to
		during project implementation	<ul style="list-style-type: none"> Stakeholder knowledge and skills in SEA/SH and VAC risk mitigation, prevention, and response strengthened 	MoHERST Stakeholders	
	Implementation of GM related activities and mitigation measures, including procedures for ethical and confidential management of SEA/SH and VAC claims	First and second quarter of the project implementation	Increased community understanding and participation on Environmental and Social risks and benefits; (developments, progress, SEA/SH, VAC and GM procedures, etc.) through relevant radio and TV programs and public meetings as appropriate.	2,000	NEA/PIU/ESS/SSS/GBVS Ministry of Health
2	ESMP Implementation, Monitoring, Evaluation and Reporting				
	Implementation of the mitigation measures, including SEA/SH	Annually during all phases	Increased community understanding and participation on environmental and social aspects related to the Project, including SEA/SH and VAC risk	10,000 x 5 = 50,000	PIU/GBoS
	Regular environmental and social monitoring of the implementation of mitigation measures and the activities, including for SEA/SH	Project implementation period	Environmental and social mitigation measures and activities including for SEA/SH monitored.	5, 000	NEA/ PIU/GBoS
	Audit of environmental and social measures	During and after construction	Environmental and social measures audited to gauge the gaps of the environmental and social risk	20,000	PIU/GBoS/NEA/Consultant
3	Operation of the GM				
	Field investigations/visits	Project implementation period	GM implementation monitored.	10,000	GRC
4	Monitoring and evaluation of the environmental and social impacts of the project at surrounding community			<u>5,000</u>	PIU/GBoS

No.	Activity	Time Frame	Expected Outcome	Budget (US\$)	Responsibility coordinate to
5	External evaluation			<u>20,000</u>	PIU/Consultant
Total				<u>183,000 USD</u>	

7.6 Integration of the ESMP

It is the responsibility of the GBoS PIU to ensure that this ESMP is fully integrated into all Project preparation and planning. The ESMP shall form part of any bid documentation for the rehabilitation works, and it shall be the Client's responsibility to ensure that the technical requirements and data sheets of Project bid documentation is subject to review against this ESMP to ensure that all appropriate safeguard measures are captured at the bid stage.

It is further the responsibility of the PIU to ensure that this ESMP is considered in review of any Terms of Reference for Technical Assistance developed for the Project. The safeguard requirements for any design or supervision of the Project will be fully integrated into TOR to ensure that all safeguard responsibilities allocated within the ESMP are realized at the tender stage.

In this way, the ESMP will be fully integrated within the Project so that the required measures will be fully appreciated by all responsible parties and successful implementation will be achieved.

8 CONCLUSION

This ESMP has been prepared based on environmental and social assessments conducted to equip the relevant authorities of GBoS plus all stakeholders with relevant and sufficient environmental and social information about the proposed sub-project (Rehabilitation of the GBoS Office Complex and the provision of needed office furniture and equipment for the GBoS). It is hoped that the authorities at GBoS and the PIU will use this information to evaluate the environmental and social viability and sustainability of the proposed sub-project. The sub-project has environmental impacts, but do not have long term and cumulative nor significant impacts. The proposed development sub-project includes various economic benefits at the project area as well as improve the statistical performance of the country. The negative environmental impacts that have been identified and are associated with the implementation of this sub-project are minimal and could be addressed by implementing the mitigation measures proposed to ensure that they pose no threat to the environment and to the neighboring community. These measures are part of the projects' component and will bring no added cost in the implementation process.

8.1 Recommendations

Even though the sub-project focuses on rehabilitation activities, it is a regional, multi-sectoral and a multi-disciplinary project. As such, it is important that during the implementation, relevant line ministries, departments and other stakeholders are effectively involved to address some of the cross-cutting issues such as environmental and social management. The multi-disciplinary approach will ensure that emerging issues and challenges are not only adequately addressed but the addressing is done timely and appropriately. The contractor and the project proponents should take into consideration all the legislative measures put in place so as to ensure the due process is followed. The mitigation measures provided are based on the recommendations of this ESMP and they should be followed so as to address the environmental issues that may arise in the course of the implementation of this sub-project.

ANNEXES

1. Grievance Mechanism
2. The list of Community Representatives consulted
3. Terms of Reference (TOR)
4. Waste Management Plan

Annex 1: Labor Grievance Mechanism

1. PURPOSE

A grievance mechanism is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely manner and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides Project-Affected Parties address issues at an early stage and provides a clear outcome or resolution.

The key objectives of the GM are:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level.
- Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome).
- Forward any unresolved cases to the relevant authority.
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported.

To respond to concerns and grievances of Project-Affected Parties (PAPs) related to the environmental and social performance of the project, the following grievance mechanism is proposed to receive and facilitate resolution of such concerns and grievances. The grievance mechanism provides below, specific procedures to manage Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints ethically and confidentially, accompanied by an appropriate response protocol at Annex B.

It is anticipated that some of these concerns may include eligibility criteria for project opportunities, loss of livelihood or properties. The mechanism for grievance redress shall thus include:

- Provision for the establishment of a grievance redress committee (see GRC members below) for the workers.

2. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

a. Human Resources and Implementation

The PIU Environmental and Social Specialists together with the GBV Specialist, will conduct stakeholder outreach during the sub-project implementation and respond to any grievances or complaints that may arise. The Environmental and Social Specialists will be the Community Liaison Officers (CLOs) as the location of the site is in the urban area where monitoring will be frequent due to close proximity with the office. The two CLOs will act as key points of contact to bring project grievances from PAPs, stakeholders, construction workers, residents, and community members to the Grievance Redress Committee (GRC). The CLOs will be responsible for making sure the recommendations of the GRC are implemented through all phases of the sub-project and the direct contractor to make any appropriate adjustments to the works. The contractor shall take actions to address grievances.

b. Management Functions and Responsibilities

During the implementation phase of the sub-project, the grievance redress committee shall include:

- Establishing a Grievance Redress Committee (GRC). GBoS will determine a sitting allowance for GRC members.
- Multiple grievance uptake locations and multiple channels for receiving grievances (for example: Toll-free telephone hotline, e-mail or social media handles, verbally lodge grievance to the Contractor, Complaint form to be lodged via any of the above channels, Walk-ins may register a complaint at the GBoS Office etc.
- Fixed service standards (transparency, fairness, accountability, timeliness) for grievance resolution and adjudication process.
- Prompt and clear processing guidelines: including reviewing procedures and monitoring system (see flow chart on GM chapter).
- A time frame for responding to grievances (see flow chart on GM chapter).
- A reliable and effective reporting and recording system (grievance register, complaints logbook – both hard copy and e-copy).
- A clear and transparent procedure for assessing and responding to the grievance.
- Capacity building of both actors working in the GM and among contractors and community of how the GM works.
- Development of specific and separate survivor-centered GM procedures for the ethical and confidential management and resolution of GBV, including SEA, SH, and VAC complaints.

3. ROLES AND RESPONSIBILITIES

1. **The Grievance Redress Committee (GRC)** will be responsible for receiving and resolving complaints in a fair, objective, accountable, effective, timely and accountable manner in all phases of the project lifecycle.

The broad responsibilities of the GRC with the assistance from GBoS include:

1. Developing and publicizing the grievance management procedures
 2. Receiving, reviewing, investigating, and keeping track of grievances
 3. Adjudicating grievances
 4. Monitoring and evaluating the fulfilment of agreements achieved through the grievance redress mechanism.
2. **Community liaison officers (CLOs):** Their contact information will be published and communicated via public announcements and information sharing about the sub-project, (radio, sign boards, letters and meetings etc.), to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise.
 3. **The contractor:** During the implementation, the contractor, their staff, and all workers related with the Project must comply with the World Bank standards on Environmental, Social, Health and Safety (ESHS) and Occupational Health and Safety (OHS) in the workplace and conduct with affected communities. The application of a Code of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV, including SEA/SH and VAC.

The Project and Contractor should make sure the Code of Conduct is signed, behaviors monitored, and adopted by those working on the project. The contractor is responsible for:

- Creating awareness of the ESHS and OHS expectations on the project.
- Creating common awareness about SEA/SH and VAC and ensure a shared understanding that they have no place in the project; and create a clear system for receiving, responding to, and sanctioning SEA/SH and VAC incidents as per the GM.

The code of conduct is set for strict use and follow (see Annex A for more details):

The code of conduct will be explained and displayed in the worksite, workers and the affected community will be sensitized prior to works start and during sub-project implementation. *Sensitization campaigns on the GM and Code of Conduct shall be conducted every month for the affected community and bi-weekly for workers. These will be monitored to ensure compliance.* Every new worker will receive a training on the GM and Code of Conduct before he or she starts working. The contractor liaison officer will work closely with the Project Community Liaison Officers to bring to the GRC all complaints.

For issues regarding SEA/SH and VAC-related claims, please see the procedures set forth below under Section 6 and the Response Protocol, which appears at Annex B.

4. COMPOSITION AND MEMBERSHIP OF THE GRC

Project Community Liaison Officers (the environmental and social specialists) who are situated within GBoS PIU will be designated to receive, review, record, and address project related complaints. Every month the safeguards team (***the social and environmental specialists***) will collect complaints to submit to the GRC. The GRC meets at least once per month, depending on the number and type of complaints received. The Contractor Liaison Officer will contact GBoS PIU safeguards team in case a complaint is not resolved within one week After receiving the alert, the PIU safeguards team will go to the field in order to obtain further information and resubmit the case to the GRC. The complainant will be notified that further information is being collected and keep those person/persons informed about the status.

These complaints will be submitted to the Grievance Redress Committee It is represented by permanent member:

- Rep of National Environmental Agency
- PIU Social and Environmental Specialists
- HISWACA SOP1 Project Coordinator
- Representative from the Ministry of Gender, Children and Social Welfare

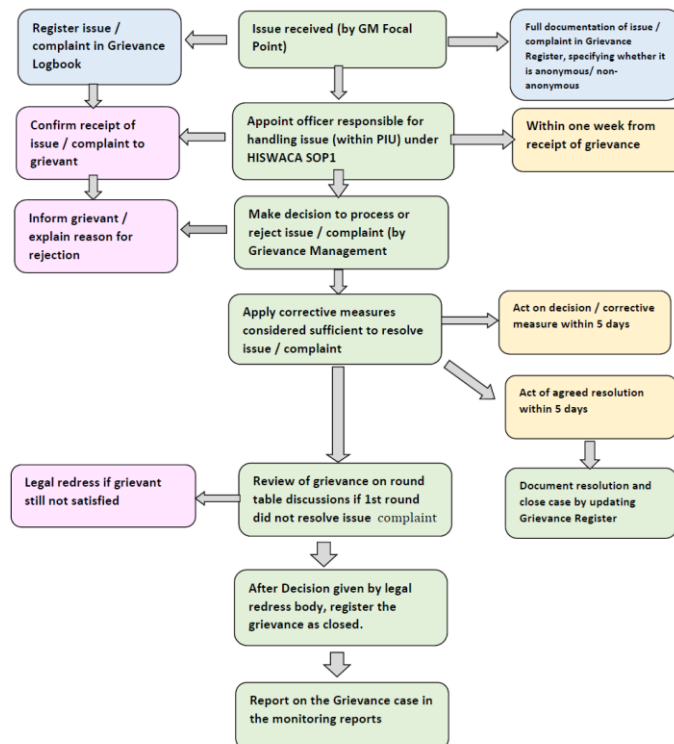
5. DESCRIPTION OF THE LABOR GM

GM Description

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	<p>(i) <u>Community Level Grievance Mechanism</u> - Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project and/or Government representatives at the local and national level.</p> <p>(ii) <u>Project Level Grievance Mechanism</u> - <i>The Grievance Redress Committee</i> will be responsible for receiving and resolving complaints in a fair, objective, accountable, effective, timely and accountable manner in all phases of the project lifecycle. It will deal with all grievances that have not been resolved at the local level.</p> <p>(iii) <u>National Level Grievance Mechanism</u> - If the GRC does not provide a satisfactory resolution for the Project Affected Person, he or she will be advised to either appeal to the Permanent Secretary, Ministry of Finance for a review of the decision of the Committee or seek resolution of grievances through the judicial system as provided for in the Constitution 1997 and other relevant laws.</p>		
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> • Toll-free telephone hotline • E-mail or social media handles • Verbally lodge grievance to the Contractor • Complaint form to be lodged via any of the above channels • Walk-ins may register a complaint at the GBoS Office. 	Anytime	
Sorting, processing	Any complaint received is forwarded to the GM Focal Point, Logged in the GM Register, and categorized according to the following complaint types: sensitive (i.e., SEA/SH/VAC) and non-sensitive complaints.	Upon receipt of complaint	GBoS PIU Social Specialist
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the GM Focal Point.	Within 2 days of receipt	GBoS PIU Social Specialist
Verification, investigation, action	Investigation of the complaint is led by the verification team to establish its authenticity and relation to the Project. A proposed resolution is formulated by the Grievance Committee and communicated to the complainant by the GM Focal Point.	Within 7 days	The Grievance Committee

Step	Description of Process	Time Frame	Responsibility
Monitoring and evaluation	Data on complaints are collected in a database and reported to GBoS PIU Management and the Bank every quarter through reports.	10 working days after grievance resolution	GBoS PIU Social Specialist
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by the GM Focal Point.	Within 5 days	GBoS PIU Social Specialist
Training	Training needs for Contractors and workers are as follows: <ul style="list-style-type: none"> • Environmental and social assessment and risk management • Community health and safety, including SEA/SH and security risk management • OHS/ ESMP Training for Contractors • SEA/SH risk mitigation and conducting consultations on SEA/SH • Labor Management Procedures • Monitoring and implementing a GM (including SEA/SH GM process) 		

Figure 5 Grievance Mechanism Process



The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH.

6. Addressing Sensitive (SEA/SH & VAC) Complaints

For complaints regarding SEA/SH and VAC, the procedure of receiving and treating the complaint will be different from the procedure for general complaints outlined above. At all times, the approach for such issues will follow a survivor-centered approach, will ensure confidentiality, safety, protection and act only with survivor's informed consent. The security of the involved parties will not be breached. Staff will be trained on how to report SEA/SH cases and how to use the channels of lodging a complaint, codes of conduct with clauses on sexual exploitation and abuse and sexual harassment will be developed and signed by all field and office staff, acknowledging the fact that SEA/SH is prohibited and how misconduct will be sanctioned. A sensitization campaign will be conducted nationwide to inform them about content of codes of conduct, how to submit complaints and what services are available for survivors. A mechanism in the form of **SEA/SH Compliance Team** will be set up to manage cases of SEA/SH as well as issues related to violence against children (VAC).

Step 1: Uptake

A complainant who wishes to lodge a SEA/SH-related grievance may use any trusted channel available for her or him to file a complaint with the project GM. The project should identify secure, confidential, and accessible entry points through which survivors will feel safe and comfortable making reports (e.g., an anonymous complaint box, grievance form, telephone, service provider or focal point, etc.). Complainants may also use contractor grievance processes to file SEA/SH claims, but once filed with the contractor, the claims should be referred for verification to the project GM operator who will forward them to the SEA/SH Compliance Team.

A complaint intake form should be completed by the appropriate actor after having obtained the survivor's written consent to proceed with the grievance. If the complainant has not yet been referred for services, the intake actor should confirm whether the survivor wishes to receive support, and if so, obtain the survivor's consent to be referred for appropriate care and connect the survivor with locally available providers or arrange for remote support where needed. Medical, psychosocial, and legal aid services should at least be made available, other services as well if possible (e.g., socio-economic, security and legal.).

If the survivor chooses to be referred for services only and not to file a complaint, then the survivor's wishes must be respected; the service provider can then ask if the survivor consents to share basic case information in order to assist the project to track the cases that choose not to access the GM. The survivor always retains the right to be referred for services whether or not there is a link established between the project and the incident in question.

Actors must be trained on how to receive and refer SEA/SH cases in accordance with survivor care principles, how to apply active listening techniques, and how to complete and store intake forms safely and confidentially. Any information collected about a survivor or the alleged perpetrator must be recorded and maintained separately from other grievance documentation, in a secure and lockable space, with strictly limited access.

The response protocol for addressing SEA/SH claims is attached at Annex B.

Step 2: Sort and process

Once the complaint has been formally received by the GM operator, with informed survivor consent, the GM focal point should verify that the complainant has been offered the opportunity to receive services, and if not, ensure that the survivor is referred for necessary services upon obtaining the survivor's informed consent.

The complaint should then be triaged as a SEA/SH complaint and the coordinator for the SEA/SH Compliance Team notified that a SEA/SH complaint has been received and will need review. The GM focal point should also notify the appropriate GBV Specialist, who in turn will inform the World Bank project lead, within a 24-hour period that a SEA/SH complaint has been received. The GM focal point need only share the nature of the case, the age and sex of the complainant (if known), whether there is a link with the project, and whether the survivor has been referred for services. **Absolutely no identifying information for the survivor or the alleged perpetrator may be shared with either the PIU or World Bank focal points.**

Step 3: Acknowledge receipt

The GM focal point should ensure that the complainant receives a document acknowledging formal receipt of the SEA/SH grievance within three days of the complaint being filed. Delivery of the acknowledgement to the complainant will depend upon how the complaint was initially received; if, ideally through a service provider, then all communication with the survivor can be done through the service provider.

Step 4: Verification process

The verification process for a SEA/SH grievance will be handled by the SEA/SH Compliance Team established through the GM operator. These team members will be specially trained on the management and review of SEA/SH complaints, the importance of a survivor-centered approach, as well as guiding principles for survivor care and management of SEA/SH data and claims. If permitted by the survivor, a representative from a service provider should participate in the SEA/SH Compliance Team in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.

Once convened by the coordinator, the SEA/SH Compliance Team will review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The team will also make their recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions per the code of conduct, type of incident, and the appropriate labor laws and regulations. Potential disciplinary sanctions for alleged perpetrators can include, but are not limited to, informal or formal warnings, loss of salary, and suspension or termination of employment.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt

of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the SEA/SH Compliance Team can make only its recommendations.

Members of the SEA/SH Compliance Team should be chosen in accordance with the following principles:

- i. Competence in their capacity to perform the team's work;
- ii. Transparency in the choice of the team members in accordance with clearly defined criteria;
- iii. Confidentiality of all involved parties, which must be respected by team members; and
- iv. Impartiality of its chosen members, who are able to participate and perform their work without conflicts of interest.

Step 5: Monitor and evaluate

Monitoring of the SEA/SH complaints will be important to ensure that all complainants are offered appropriate service referrals, that informed consent is obtained in all cases for both filing of grievances and service referrals, and that all grievances are handled safely and confidentially, and in a timely manner. Any information shared by the GM operator back to the PIU or World Bank will be limited as noted above under Step 2. The project GM operator should enter into information-sharing protocols with service providers in order to ensure safe and confidential sharing of case data as well as appropriate closures of SEA/SH cases.

Step 6: Feedback to involved parties

Once the verification process has been concluded, the result of the process shall be communicated first to the survivor, ideally through the service provider, in order to allow the survivor and relevant advocates the appropriate amount of time to ensure adequate safety planning as needed. Once the survivor has been informed, the alleged perpetrator can be informed of the result as well.

If either party disagrees with the result, s/he is permitted to appeal the SEA/SH Compliance Team's decision via the GM appeals process and must file an appeal within fourteen days of receipt of the verification result.

ANNEXES FOR THE GRIEVANCE MECHANISM

Annex A: Code of Conduct

Annex B: Response Protocol for SEA/SH Complaints

Annex C: Grievance Log (for non-SEA/SH complaints)

Annex D: Intake Form

Annex A: Code of Conduct

A. Code of Conduct (Standards for Consultants and Contractors)

I _____ will:

Uphold the integrity and reputation of the Institution by ensuring that my professional and personal conduct is consistent with rules values and standards.

When working in an international context or travelling locally on behalf of the Institution I will be observant of all local laws and be sensitive to local customs.

I will seek to ensure that my conduct does not bring the institution or anybody into disrepute and does not impact on or undermine my ability to undertake the assignment for which I have been engaged.

I will not work under the influence of alcohol or use, or be in possession of, illegal substances during work at office duties or client premises or accommodation.

In addition, I will :

- treat all people fairly with respect and dignity and not discriminate against specific groups such as women, people with disabilities, migrant workers or children
- not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
- not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another
- not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
- not engage in sexual activity with children (persons under the age of 18).
- acknowledge that mistaken belief in the age of a child is not a defense.
- not exchange money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior
- acknowledge that this behavior is prohibited. I recognize that this includes any exchange in return for assistance that is due to a beneficiary.
- not engage in sexual relationships with beneficiaries.
- Will recognize that such relationships are based on inherently unequal power dynamics.
- not engage in any commercially exploitative activities with children or vulnerable adults including child labor or trafficking.
- not physically assault a child or vulnerable adult.
- not emotionally or psychologically abuse a child or vulnerable adult.

Ensure the safety, health and welfare of all consultants and client staff members and associated personnel (volunteers, partners, suppliers and subcontractors)

I will also:

- adhere to all legal and organizational health and safety requirements in force where I am working.
- comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines.
- avoid behavior that could result in unnecessary risk to the safety, health and welfare of myself and others, including clients, partner organizations and communities with whom we work.
- complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
- report violations of this Code of Conduct; and
- not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Mechanism.

Be responsible for the use of information, assets and resources to which I have access because of my employment with the Institution I will:

- ensure that I use Institution and client assets and resources entrusted to me in a responsible manner and will account for all money and property.
- not use the institution or client IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics. It also includes any material that encourages extremism.
- not use Institution or client IT equipment to view, download, create, distribute, or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse.

Perform my duties and conduct my private life in a manner that avoids conflicts of interest

I will

- declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of the project and not be involved in awarding benefits, contracts for goods or services, employment or promotion within the Institution or Project's clients, to any person with whom I have a financial, personal, family (or close intimate relationship) interests.
- inform the Institution of any nominations to an official role in a political party and understand that this may result in the need for me to withdraw from current and future contracts.
- not accept significant gifts or any remuneration from government, communities with whom we work, donors, suppliers and other persons which have been offered to me as a result of my engagement with them.

Uphold confidentiality

I will:

- exercise due care in all matters of official consultant business.
- not divulge any confidential information relating to colleagues, clients, work-related matters or any sensitive information unless legally required to do so.

I understand that any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

I have received a copy of this Code of Conduct written in a language that I understand. I understand that if I have any questions about this Code of Conduct, I can contact the Social Safeguards Specialist requesting an explanation.

Signed: _____

Name: _____

Date: _____

Complaints and reports

- Project staff are obligated to bring to the attention of the relevant authority any potential incident, abuse or concern, which appears to breach the Standards, contained in this Code. Staff in this context includes contracted consultants as well as employed staff. This applies to incidents that they witness, are made aware of, or suspect have occurred.
- Project staff reporting concerns are protected by the Whistleblowing policy.
- Contracted consultants who have a complaint or concern relating to breach of the Code should report it immediately to the relevant authority. This would normally be the PIU employee who contacted them about an assignment. If the complaint or concern is more general than a specific assignment, they should use either the Supervisor or appropriate authority as their first point of contact. In their absence, you should contact the PIU E&S Specialists.

Safeguarding Policy

This Safeguarding Policy lays out firm commitment to ensuring the safety and protection of all children, young people and vulnerable adults with whom the organization engages.

This includes:

- Promoting the welfare of children, young people and vulnerable adults through facilitating referral to free and quality GBV service provision
- Preventing harm through awareness raising and proactive measures to identify and mitigate risks.
- Protecting children, young people and vulnerable adults by responding quickly and effectively whenever harm or abuse is identified
- Partnership and collaboration with other organizations facilitating referrals and joint activities to prevent and respond to actual or potential harm against children, young people and vulnerable adults.

This policy covers all forms of physical abuse, emotional ill-treatment, sexual exploitation, abuse or harassment, and neglect, denial of resources, commercial or other exploitation that results in actual or potential harm. This includes harm, which is caused intentionally or unintentionally, directly or indirectly.

The policy applies to:

- All staff who are contractually employed by the project.
- All individuals who carry out work, paid or unpaid, in the name of CONSULTANT. This includes board members, volunteers/interns, consultants and service providers.
- All project visitors including journalists, media personnel, investors and any other individual visiting project during implementation work in any capacity.

Relevant Partners who are in contact (direct or indirect) with children, young people and vulnerable adults are expected to have their own safeguarding policies and procedures in place. In the case a partner do not have their own safeguarding policies they must abide by the project 's safeguarding policies. If there are areas where the policy is stronger the partner subjects to review the Policy in those areas and this will cover this in the partnership agreements.

The PIU will treat any breach of its safeguarding procedures seriously. Failure to comply with this policy may incur sanctions ranging from disciplinary action (including possible dismissal), termination of contracts or partnerships and, where appropriate, referral to the police or other relevant authorities.

Duty to Safeguarding

The duty of safeguarding by the E&S Specialists is categorized into two; i) internal and ii) external incidents:

- I. Internal incidents are events that cause harm or may cause harm to children, young people and vulnerable adults which involve CONSULTANT staff, volunteers, contractors, partners, consultants, and service providers. This includes anyone having a financial/contractual relationship with the organization. These incidents are normally handled through CONSULTANT safeguarding policy and procedures.
- II. External incidents are events that cause harm or may cause harm to children, young people and vulnerable adults in the broader community or environment in which are affected in the project work. They do not involve directly. These incidents are normally referred to external service providers.

It is important to clearly outline the objectives and commitment to safeguarding. It needs to consider the welfare and protection of children, young people and vulnerable adults to be an organizational imperative, with primacy over the success of programs or strategic objectives.

The organization has a zero-tolerance approach to the harm of children, young people and vulnerable adults. CONSULTANT believes that everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender assignment, religion, political or other opinion, national, ethnic or social origin, or disability.

The project is committed to safeguarding through the following means:

- Detecting: Ensuring all staff can identify abuse situations.
- Sensitization: Ensuring that all staff and others are sensitized on safeguarding issues.
- Prevention: Ensuring through good practice, the minimization of risks to children, young people and vulnerable adults.
- Reporting: Ensuring that we are clear on what steps to take where concerns arise.
- Responding: Ensuring that action is taken to protect children, young people and vulnerable adults where concerns arise.

Obligations of Staff and Representatives

The project is committed to the following when cases of exploitation, abuse, harassment or harm to children, young people and vulnerable adults are known or suspected:

- Taking any concerns raised seriously;
- Taking positive steps to ensure the protection of children, young people and vulnerable adults who are the subject of any concerns;
- Supporting the child, young person, staff or other adults who raise concerns or are the subject of concerns;
- Acting appropriately and effectively in instigating or co-operating with any investigation;
- Being guided through all processes by the principle of the best interest of the child;
- Listening to and taking seriously the views and wishes of the child, young people and vulnerable adults;
- Working in partnership with parents/caregivers and others to ensure the protection of the child, young adults and 1-qqvulnerable adults;
- Carrying out any investigation honestly and fairly and with due regard to CONSULTANT disciplinary procedures and legal procedures.

The project staff and representatives are required to:

- Popularize and make themselves familiar with and understand these local procedures for reporting and responding to individual or specific cases of abuse;
- Report concerns that a child, young person or vulnerable adult has disclosed a risk or case of abuse or harm immediately in accordance with these local procedures.

- Document clear records of the reported or witnessed concerns.
- Concerns may include situations whereby:
 - You see, hear of, by any means or suspect a case of abuse
 - An allegation of abuse is made to you
 - Disclosure of an incident of abuse
- Respond to a child, young person or vulnerable adult who has been abused or about to be abused in accordance with these local procedures and in accordance with their best interests and safety.
- Cooperate fully and confidentially in any investigation of concerns or allegations.

Standards for Reporting Safeguarding and Impact Concerns

- i. **Mandatory Internal Reporting** - It is the responsibility of all staff, outside contractors and partners to take seriously any concerns, complaints, allegations, suspicions and incidents involving children, young people and vulnerable adults. Reporting these concerns to the designated Safeguarding Officer is a mandatory requirement in the project implementation. Failure to report will be considered a serious breach of the project Safeguarding Policy.

Mandatory reporting relates to any potential risk or actual harm caused to any child, young person or vulnerable adult regardless of their relationship with the victim and irrespective of age, religion, gender, race or socio-economic status. Concerns about harm or abuse must be internally reported where:

- The alleged perpetrator is a project staff, visitor, associate or a member of staff of a partner organization.
 - The alleged perpetrator is a member of the child's family, community or is unknown to the child, young person or vulnerable adult.
 - The alleged perpetrator is also a child, although responses should take into account the protection and safety of both the affected child and the alleged perpetrator.
 - The abuse is historical. Most abuse is not disclosed until many years after it has occurred but the risks of harm to children, young people and vulnerable adults may persist and require investigation.
 - The report is anonymous as this does not automatically mean that it bears less substance but may indicate fear of reprisal, shame or other barriers to disclosure. Anonymous reports should be taken seriously as 'named' reports although the extent to which they can be investigated may be limited by the anonymity.
- ii. **Duty of Care** Givers have a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with children, young people and vulnerable adults. When cases of abuse are identified, The duty of care encompasses:
 - Listening and providing re-assurance to the child, young person or vulnerable adult.
 - Helping the child, young person and vulnerable adult to share their concerns with a trusted adult who can help them decide what further action to take (e.g., parent/caregiver)
 - Providing details of recognized, child-friendly, youth, disabled or other agencies who can provide protection (e.g., save the children, the police) or additional advice and support (e.g., recognized telephone helpline, a local child protection agency)

- Ensuring concerns relating to project staff, consultants, partners service providers or visitors are fully investigated and action taken
 - Ensuring staff have access to their code of conducts and are familiar with the Safeguarding policy, reporting guidelines and procedures.
 - Ensuring there is a focal person designated to ensure Safeguarding policy is prioritized for implementation.
 - Appropriate follow ups of Safeguarding reports in agreement with the policy
 - Applying disciplinary measures to staff who fall short of policy principles.
 - Providing support to survivors of harm by staff or associated personnel
- iii. Organizational Responsibility – the responsibility for decisions and actions rests with GBOS as an organization and not with any individual. Staff and any other representatives of the organization must not act in isolation but must consult with the project’s designated Safeguarding Officer or the appropriate authority before taking any action in response to the child protection concerns.

B. Staff Code of Conduct

i. General Professional Conduct

- Be polite, considerate and provide an example of the good conduct that you wish others to follow.
- Never use language or behavior that discriminates on the grounds of gender, race, culture, age, disability, religion or sexuality.
- Never engage in any activity that could bring the organization into disrepute. The Policy does not seek to dictate the values by which you conduct your personal life but actions taken outside of working hours that contradict this policy will be considered a violation and will be investigated.
- Challenge unacceptable behavior and report any concerns immediately.
- No sexual activity with anyone under the age of 18
- Do not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor’s or Employer’s Personnel;
- Do not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
- Do not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
- Do not rape or attempt to rape
- Do not engage in commercial sex
- No staff should have a sexual relationship with beneficiaries
- Do not hit or physically assault a child, young people or vulnerable adults
- Do not put a person at risk or harm
- Do not use position of power to take unfair advantages of a fellow staff member, beneficiary or volunteers.
- Do not accept gift (in kind or cash) from beneficiaries
- Do not harbor GBV survivors at home
- Do not expose GBV survivor’s identity publicly without consent.

- ii. Preparation for Visits
 - Attempt to understand the local cultural and religious norms, particularly those related to contact between children and adults.
 - Ensure that you take clothing that is appropriate to the local culture and religion.
 - Discuss contact with children and young people with the appropriate person or authority in advance to identify and minimize any potential risks

- iii. Interactions with children, young people and vulnerable adults
 - Always ensure that children, young people and vulnerable adults know who you are and why you are visiting.
 - Always ask permission before taking photographs or videos and ensure that the proper consent for further usage is obtained.
 - Always treat children, young people and vulnerable adults with respect and never act in a way which could shame, humiliate or degrade them.
 - Never show favoritism or spend excessive time with one child or young person or vulnerable adult. You should avoid developing close emotional ties with any one individual.
 - Never offer money or gifts to individual children or their family. Where gifts are given, they should only be given to groups of children and should be of minimal value.
 - Never be alone with children or young people or placing yourself in any situation which could be misinterpreted.
 - Never take a child or young person or vulnerable adult in your care, to your hotel or to any other private spaces.
 - Never share personal details about yourself (your hotel, home address or contact details) or agree to connect with children or young people on social media

- iv. Physical Contact with children, young people or vulnerable adult
 - Always wait for the child to initiate any type of physical contact - remember your presence may be unsettling and any attempt to initiate physical contact may be misinterpreted.
 - Never hit or physically chastise a child or young person or vulnerable adult (including using physical restraint to contain behavior)
 - Never give assistance in aspects of personal care (e.g., dressing, bathing etc.)
 - Never engage in or allow sexually provocative games or behave in a manner which might be considered inappropriate or sexually provocative.
 - Never sleep in the same room or bed as a child or young person with whom you are working.
 - Never develop physical/sexual relationships with children, young people, vulnerable adults or other beneficiaries.

- v. Use of Social Media
 - Never directly post images or stories about children, young people or vulnerable adults who are engaged with you on your personal social media accounts. Consent is given to you as an organization and not to the individual for personal use.
 - Never accept contact requests or engage with children, young people or vulnerable adults you have met through contact via personal social media.
 - Never post anything that could damage the integrity or brand of the organization
 - Never upload or post any racist, tribalism, defamatory, obscene, or abusive content.

I understand that any violation of this Code of Conduct may result in serious consequences, up to and including termination and possible referral to legal authorities.

I have received a copy of this Code of Conduct written in a language that I understand. I understand that if I have any questions about this Code of Conduct, I can contact the Social Safeguards Specialist requesting an explanation.

Signed: _____

Name: _____

Date: _____

Annex B: Response Protocol for SEA/SH Complaints

This annex provides standard operating procedures to follow for service referrals when a complaint related to SEA/SH is received through the project's grievance mechanism. This protocol should be adapted for each project intervention zone as needed to incorporate information about relevant and available local service providers.

Protocol objectives

This protocol outlines the procedures to follow when a case of SEA/SH is reported and identifies the principal response actors that provide survivor support, normally health, psychosocial (which can include social reinsertion), and legal services. This protocol also outlines the roles, responsibilities, and guiding principles regarding SEA/SH response and survivor care.

Key terms and concepts

Aggressor: The person, group, or institution that inflicts directly, or supports by any other means, violence or abuse inflicted on another against his or her will.

Consent: Consent must be informed, based on a clear appreciation, and understanding of the facts, implications, and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force, or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.

Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.¹¹ Mistaken belief regarding the age of the child and consent from the child is not a defense in SEA of children. Sexual activity with individuals below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.¹²

Gender-based violence (GBV): Umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.

Sexual exploitation: Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

¹¹ Articles 1 of the UN "Convention on the Rights of the Child" defines children as those under the age of 18. The UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and abuse, October 9, 2003, ST/SGB/2003/13 also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (para 3.2 b).

¹² The age of consent has important implications for workers employed on World Bank-financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such underage marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

Survivor or victim: An individual who has experienced an incident of GBV, including SEA/SH. The terms “victim” and “survivor” are used interchangeably. The term “victim” is most often used in the medical and legal fields, and the term “survivor” is used more often in the field of psychosocial support to denote internal individual resilience.

Survivor-centered approach: The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence or abuse. The survivor-centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.

GBVIMS classifications

The Gender-Based Violence Information Management System (GBVIMS) offers six principal and systematic classifications for GBV, as listed below. Intake forms may use these classifications to identify a particular type of GBV incident. Cases of SEA and SH, apart from rape, would be classified under sexual assault.

Rape: non-consensual penetration (however slight) of the vagina, anus or mouth with a penis or other body part. Also includes penetration of the vagina or anus with an object.

Sexual assault: any form of non-consensual sexual contact that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks. Female genital mutilation/cutting (FGM/C) is an act of violence that affects sexual organs, and as such, should be classified as sexual assault. This incident type does not include rape, i.e., where penetration has occurred.

Physical assault: an act of physical violence that is not sexual in nature. Examples include hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that results in pain, discomfort, or injury. This incident type does not include FGM/C.

Forced or child marriage: the marriage of an individual against her or his will.

Denial of resources, opportunities, or services: denial of rightful access to economic resources/assets or livelihood opportunities, education, health, or other social services. Examples include a widow prevented from receiving an inheritance, earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, a girl prevented from attending school, etc.

Psychological or emotional harm: infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, verbal

harassment, unwanted attention, remarks, gestures, or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Guiding principles for survivor care

Confidentiality: always Respect the confidentiality of the survivor and his/her family. If the survivor gives her/his informed consent, share only relevant information with others for the purpose of helping the survivor, such as referring for services. Confidentiality and anonymity of the alleged aggressor's identity must also be respected. All identifying personal information (name, address, etc.) must be withheld in the reporting, compilation and sharing of data.

Exceptions to confidentiality occur only when an adult survivor is threatening her or his own life or the life of another person and when the survivor is a child.

Non-discrimination: Any adult or child, regardless of sex, has the right to receive care and support under the same conditions. SEA/SHSEA/SH survivors must receive equal and impartial treatment, regardless of their race, ethnicity, religion, nationality, sexual orientation, or gender identity.

Respect: All actions taken will be guided by respect for the wishes, choices, rights, and dignity of the survivor.

Security: Always ensure the safety of the survivor. Remember that s/he may be frightened and need assurance that s/he is safe. In all types of cases, ensure that s/he is not placed at risk of further harm by the alleged aggressor. If necessary and with survivor informed consent, ask for assistance from police, elders, community leaders or others who can provide security. Maintain awareness of safety and security of people who are helping the survivor, such as family, friends, counselors, and health care workers.

Types of survivor support services

Actors that receive specialized training or have considerable programming experience in relation to service provision for GBV survivors are considered specialized providers, such as for health and psychosocial support services and case managers.

Actors that work in sectors outside of the GBV prevention and response arena are considered non-specialized providers though they may still be actors that offer other support services or additional entry points for orienting survivors towards assistance.

Health: A survivor, especially following an incident of rape, may need medical care to treat injuries or to receive sexual or reproductive health care services, such as prevention of STIs, screening for and prophylactic treatment of HIV/AIDS, emergency contraception, and other common treatments for the physical consequences of GBV. Medical care can also encompass medico legal evidence collection.

Legal assistance: These services offer legal counsel to survivors who wish to report or file a complaint in court against the alleged aggressor. Legal assistance also encompasses proper representation for the survivor before the court system and proper support throughout the legal process. Legal interventions in some project areas can be very limited and weak; therefore, it is important for the survivor to understand all of the advantages and disadvantages of pursuing a legal remedy in order to ensure an informed decision.

Psychosocial: These services aim to offer a response to the harmful emotional, psychosocial, and social effects of GBV. Psychosocial support seeks to improve the survivor's well-being in aiding her/him to heal, re-establishing a normal life, protecting the survivor from an accumulation of troubling events, and encouraging the survivor and her/his family to rebuild their lives and envision a positive future. These services can encompass individual case management as well as group activities that target emotional support and social reintegration.

Security: All service providers must prioritize and reflect upon the safety and security of the survivor and her/his family, as well as that of their provider colleagues offering support. Security services may encompass support from law enforcement or the court system, but this will depend upon the project context and whether these agents have been properly trained and equipped.

Additional survivor support options: For survivors or complainants who are project personnel or workers, and with the survivor's full participation and consent, the project may also be in a position to undertake further survivor support measures to ensure the survivor's safety, such as adapting personnel duties, location, or hours; facilitating safe transportation options; ensuring adequate leave for needed appointments, safe accommodation, or caregiver duties; and adopting other measures to ensure family-friendly or flexible work arrangements.

Procedure for referrals or requests for assistance

❖ Reporting an incident

A survivor has the right to report an incident of SEA/SH to any actor or individual that s/he wishes and whom she trusts, such as a family member, a friend, another member of the community, a service provider, or community or religious leader. A survivor may choose to receive or not to receive support or be referred for services, such as health or psychosocial care. Any actor or individual in whom a survivor confides should give the survivor all possible information about her/his options and available services if the survivor consents. Service providers often provide helpful entry points, but any entry point into the grievance redress system must be accessible, secure, reliable, and confidential.

❖ Referring for services

Service referrals can happen in multiple directions:

- Referrals from individuals or actors who are not specialized GBV service providers;
- Referrals among specialized GBV service providers (e.g., between a medical and psychosocial support provider); and
- Referrals from specialized GBV providers to non-specialized providers, who may offer services in other areas not directly linked to GBV services.

When a non-specialized provider receives a report of SEA/SH, this actor's principal priority is to provide basic emotional support as well as offer information to the survivor as to locally available services for referral, with the survivor's consent. Immediate actions for this individual would be to:

❖ Offer active listening;

Provide basic information about locally available services;

Ask for the survivor's informed consent for referral; and

❖ **Refer to other services in a timely manner.**

The non-specialized actor should ensure that the suggested service provider can in fact provide assistance to the survivor, and once the survivor is referred for other services, the direct assistance from the non-specialized provider ends there.

Specialized providers that receive a report of SEA/SH must provide care to the survivor in accordance with international best practices and guiding principles for survivor care.¹³ Holistic support from specialized providers includes case management, medical care, psychosocial support and mental health interventions, security options, and legal assistance. These actors must likewise be active listeners and provide all information about a survivor's available options, obtaining the survivor's informed consent first before proceeding. Specialized providers should also provide survivors, and/or their caregivers where needed, information about any mandatory reporting laws, if relevant in a particular context, before proceeding.

13 See Clinical Management of Rape (World Health Organization, 2009); Caring for Child Survivors of Sexual Abuse: Guidelines for health and psychosocial service providers in humanitarian settings (UNICEF and IRC, 2012); Interagency Gender-Based Violence Case Management Guidelines (IASC, 2017); and Minimum Standards for Prevention and Response to Gender-Based Violence in Emergencies (UNFPA, 2015).

Annex C: Grievance Log (for non-SEA/SH complaints)

Case no.	Date Claim Received	Name of Person Receiving Complaint	Where/ how the complaint was received	Name & contact details of complainant (if known)	Content of the claim and type (include all grievances, suggestions, inquiries)	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication and by whom)	Expected Decision Date	Decision Outcome (include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when and via what method of communication	Was the complainant satisfied with the decision? Y/N State the decision. If no, explain why and if known, will pursue appeals procedure	Any follow up action?
001											
002											
003											
004											

Annex D: Intake Form

Other case forms, including consent form, will be developed and annexed to the grievance mechanism document and response protocol.

Instructions

1- This form must be filled out by the person providing services to the client.

2- Remind your client that all information will be kept confidential, and that they may choose not to answer any of the following questions.

Staff Code	Report Date*	Incident Date*	Survivor received services at the time of report? * <input type="checkbox"/> Yes <input type="checkbox"/> No
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SURVIVOR INFORMATION

Client's Age*	Sex of Client*	Client's Origin ^o *	Specific Needs / Vulnerabilities* (check <u>all</u> that apply)
	<input type="checkbox"/> Female <input type="checkbox"/> Male	<input type="checkbox"/> Nationality <input type="checkbox"/> <i>Region</i> <input type="checkbox"/> Cluster	<input type="checkbox"/> No <input type="checkbox"/> orphan <input type="checkbox"/> Widow/widower <input type="checkbox"/> divorcee <input type="checkbox"/> Physical Disability <input type="checkbox"/> Minor <input type="checkbox"/> Separated Child
			<input type="checkbox"/> Mental Disability <input type="checkbox"/> Unaccompanied <input type="checkbox"/> Other Vulnerable Child

DETAILS OF THE INCIDENT

Incident Time of Day *	Construction Site / Location ^o *
<input type="checkbox"/> Morning (<i>Sunrise to Noon</i>) <input type="checkbox"/> Afternoon (<i>Noon to Sunset</i>) <input type="checkbox"/> Evening / Night (<i>Sunset to Sunrise</i>) <input type="checkbox"/> Not Applicable / Unknown	<input type="checkbox"/> Site #1 <input type="checkbox"/> Site #2 <input type="checkbox"/> Site #3 <input type="checkbox"/> Site #4 <input type="checkbox"/> Site #5 <input type="checkbox"/> Other

<p>Type of incident/violence* (Select all of the types below that apply to the reported incident. Refer to the GBVIMS GBV Classification Tool for further clarification)</p> <p><input type="checkbox"/> Rape (Non-consensual penetration of the mouth, vagina, anus)</p> <p><input type="checkbox"/> Sexual Assault (includes female genital mutilation)</p> <p><input type="checkbox"/> Physical Assault</p> <p><input type="checkbox"/> Forced Marriage (includes child marriage and teenage pregnancy)</p> <p><input type="checkbox"/> Denial of resources, opportunities, or services</p> <p><input type="checkbox"/> Psychological / Emotional Abuse</p> <p><input type="checkbox"/> Non-GBV (economic and cyber)</p>	<p>Incident Location^{o*}</p> <p>Outside the camp/construction site/community</p> <p><input type="checkbox"/> While travelling from point of origin</p> <p><input type="checkbox"/> Travelling from transit center to camp/construction site</p> <p><input type="checkbox"/> While collecting firewood</p> <p><input type="checkbox"/> While herding livestock</p> <p><input type="checkbox"/> Travelling from camp/site to camp/site</p> <p><input type="checkbox"/> While travelling to school</p> <p><input type="checkbox"/> Other location outside of camp/site</p> <p><input type="checkbox"/> Inside the camp/site/community</p> <p><input type="checkbox"/> At the latrine</p> <p><input type="checkbox"/> At water point</p> <p><input type="checkbox"/> At distribution point</p> <p><input type="checkbox"/> In the market/lumo</p> <p><input type="checkbox"/> At a service center/garrage</p> <p><input type="checkbox"/> While at school</p> <p><input type="checkbox"/> Inside the home</p> <p><input type="checkbox"/> Outside the home</p> <p><input type="checkbox"/> At the farm</p> <p><input type="checkbox"/> Other location inside of camp/construction site</p>
<p>Were money, goods, benefits, and / or services exchanged in relation to this incident*</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes</p>	
<p>Type of abduction at time of the incident*</p> <p><input type="checkbox"/> None</p> <p><input type="checkbox"/> Forced Conscription</p> <p><input type="checkbox"/> Trafficked</p> <p><input type="checkbox"/> Other Abduction / Kidnapping</p>	

Has the client reported this incident anywhere else?* No Yes (specify) :

ALLEGED PERPETRATOR INFORMATION

Number of alleged perpetrator(s)*	Age*	Perpetrator – Survivor Relationship *		Perpetrator occupation^{o*}
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> More than 3 <input type="checkbox"/> Unknown	<input type="checkbox"/> Adult <input type="checkbox"/> Minor <input type="checkbox"/> Adult & Minor <input type="checkbox"/> Unknown	<input type="checkbox"/> Intimate partner <input type="checkbox"/> Former partner <input type="checkbox"/> Family member <input type="checkbox"/> NGO/construction worker/Service provider	<input type="checkbox"/> Other	<input type="checkbox"/> Labourer <input type="checkbox"/> Masoner <input type="checkbox"/> Carpenter <input type="checkbox"/> Electrician <input type="checkbox"/> Engineer <input type="checkbox"/> Other

Planned Action / Action Taken	Survivor referred to...	Not Referred Because...				
		Service provided to survivor	Service received prior to this visit	Service declined by survivor	Service not available	Service does not apply
Safety services						
Health/Medical services						
Psychosocial services						
Security services						
Child protection services						
Legal aid services						
Education services						

Resources

GBVIMS, GBV Classification Tool (used with the GBVIMS).

GBV Working Group (Whole of Syria), Standard Operating Procedures for Prevention of and Response to Gender-Based Violence, 2017.

The World Bank, Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment in Investment Project Financing Involving Major Civil Works, February 2020 (2d ed.).

The World Bank, Interim Technical Note: Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects, April 2020.

World Health Organization, Ethical and safety recommendations for researching, documenting, and monitoring sexual violence in emergencies, 2007.

Annex 2: The list of community representatives consulted

No	NAME	DESIGNATION	ADDRESS	TEL. NO
1.	Sarjo Sallah	Deputy General Manager	GTUCCU	7063582
2.	Lamin Samateh	Head of EIA	NEA	2159036
3.	Sering Mass Jallow	Director of Audit	NAO	9947646/7000556
4.	Abdou Jane	Technical Director	GAI Construction	7442295
5.	Sheriff B Njie	Admin/HR Development Officer	GBoS	7770896
6.	Abiala B. Samson	Headteacher	WAIS (Junior Section)	7795972
7.	Kajally Sonko	Deputy Permanent Secretary	Ministry of Gender, Children and Social Welfare	7444158
8.	Ms Matty Sanyang	Food Seller	Located around the Project Site.	
9.	Mr Ousman Sonko	Detergent Vendor		
10.	Ms Fatou Sarr	Food Vendor		
11.	Mr Babucarr Sawaneh	Shop Keeper		
12.	Mr Momodou Sowe	Shop Keeper		

Annex 3: Terms of Reference (TOR)

I. CONTEXT AND JUSTIFICATION

The Government of The Gambia through the Ministry of Finance & Economic Affairs (MoFEA) received financial support from the World Bank to improve and modernize the statistical system of The Gambia through the Harmonizing And Improving Statistics in West And Central Africa, Series of Projects One (HISWACA-SOP1) (P178497) which was approved by the World Bank in May 2023. The Project Development Objective (PDO) is to improve country statistical performance, regional harmonization, data access and use, and to enhance modernization of the statistical system in participating countries. To achieve this objective, the project will consist of four (4) components: (1) Harmonization and Production of Core Statistics using International Data Quality Standards; (2) Statistical Modernization, Institutional Reform, Human Capital, Data Accessibility and Use; (3) Construction and Physical Infrastructure Upgrading and Modernization; and (4) Project Management.

The strategic objective on the statistical performance of the National Statistical System (NSS) relates to their ability to generate data based on international standards, on time, and their wide availability and use. The strategic objective on harmonization involves harmonization of statistical methodologies, key data collection instruments, and tools in line with international standards and country-specific realities, to produce comparable, accurate, and up-to-date statistics to inform both national development and regional integration agendas.

It is expected that the project will: provide GBoS (as the custodian of the NSS of The Gambia) with common regional guidelines and tools and have trained staff with adequate skills to implement them resulting in a stable and sustainable statistical system with adequate institutions and using innovative solutions and alternative data sources required for production of quality statistics, along with modern equipment and infrastructure.

This TOR is for: (i) the screening of the potential impact of the proposed rehabilitation of GBoS building which will inform the risk rating and determine which E&S document must be developed (an Environmental and Social Management Plan (ESMP), or E&S measures for such rehabilitation exercise, as per umbrella Environmental and Social Management Framework (U-ESMF); (ii) preparation of the E&S instrument as per the screening report; (iii) preparation of the project Stakeholder Engagement Plan (SEP) and Labor Management Plan (LMP) based on the Umbrella SEP and LMP prepared during project preparation and approved by the Bank. Along with Umbrella's documents alongside the relevant ESSs will guide the preparation of the required instruments (ESMP, SEP and LMP).

2. Project Intervention Areas

The project will support several statistical activities including a population and housing census and surveys of households and will be implemented throughout the country. The limited experience and capacities that the government at different levels might have with the application of the new ESF and the high number of stakeholders- including various government ministries and institutions, the population, business enterprises, etc. that will participate in project implementation; capacities to supervise, evaluate, mitigate and prevent environmental impact will be challenging.

There will also be minor civil works (rehabilitation of the GBoS complex) which will be supported by the Project.

3. Relevant guidance and support materials to be used by the consultant:

- The Project's approved umbrella instruments (U-ESMF, U-SEP and U-LMPF).
- **Guidance notes for Borrowers** in support of the development of the ESMP, the LMP, and the SEP. <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

A. Scope of Work

The objective of this consultation is to develop instruments that meet the requirements of the Bank's environmental and social standards applicable to the project.

The following environmental and social risk documents is to be developed by the consultant;

1. Environmental and Social Management Plan (ESMP) (Environmental and Social Standard - ESS1) for the rehabilitation of GBoS office; including SEA/SH Action Plan – see Good Practice Note on SEA/SH Risk Management mentioned in Section 3) - **Appendix A**
2. Labor Management Plan (LMP) (ESS2) (the new template for moderate risk projects to be completed can be found in the link in section 3) - **Appendix B**
3. The Stakeholder Engagement Plan (SEP), including the Grievance Management (GM) (ESS 10) - **Appendix C** (Grievance Management checklist - see link in section 3).

NB1: The government team in charge of the preparation of the project, will make available to the team of consultants all documentation and information relating to the nature of the investments as well as the potential areas of intervention proposed for The Gambia.

NB2: The specific tasks for the elaboration of each document are presented in the annexes.

B. Terms of reference of the team of consultants

Consultants will be recruited to support the preparation of the project specific instruments (ESMP, SEP and LMP) under the HISWACA project for The Gambia. These instruments will be based on the 3 umbrella Environmental and Social instruments approved by the Bank for the Project. All instruments relating to environmental and social standards will have to be subjected to a consultation and disclosure procedure. The environmental and social risk rating for the Project is **Moderate**.

Consultants recruited must hold a university degree + 5 years minimum with specialization in environmental and/or social sciences and must meet the following conditions:

- Have at least 5 years of experience in environmental and social assessments (ESMF, ESIA, ESMP, etc.)
- Experience in developing at least two (2) Environmental and Social Management Frameworks (ESMFs) for World Bank-funded projects that are implemented under the new Environmental and Social Framework.

- At least five years of experience in overseeing Gender-Based Violence (GBV) prevention and response activities. In addition, the GBV/SEA/SH consultant should have excellent knowledge of the guiding and ethical principles governing working with GBV survivors and good practices in the implementation of GBV/SEA/SH prevention and control activities. If the consultants on the team lack sufficient experience to conduct the security risk assessment, a consultant with such capacity will be required to undertake this aspect of the GBV.

The composition of the team should include:

- A Senior Environmental Consultant** who will be responsible for the overall coordination of the screening of the potential impact of the proposed rehabilitation of GBoS building and preparation of the ESMP which will be guided by the U-ESMF and its finalization.
- A Senior Social Consultant** who will be responsible for the overall coordination of all social management instruments and their finalization. (ii) he/she will revise the Stakeholder Engagement Plan (SEP) which was prepared earlier to ensure that it is in line with the SEF which was approved; and also produce the LMP following the approved U-LMPF. Both documents shall follow the new template for moderate risk projects.

II. DURATION OF CONSULTANCY

The consultancy will last for 30 working days, including the validation period, which takes effect on the start date and will cover the screening of the potential impact of the proposed rehabilitation of GBoS building; and preparation, drafting and submission of ESMP, drafting and submission of the LMP and revision and submission of the SEP; draft and final documents. The consultants should take into account any additional comments and observations from the World Bank prior to the publication of the final reports.

The Project Coordination Unit (PCU) of the Ministry of Finance and Economic Affairs of The Gambia is seeking to recruit one senior environmental consultant and one social consultant, with the following profiles:

a) The social consultant should be an expert in social assessment, holding at least a master's degree in a relevant field related to social risk management (e.g., political science, sociology, anthropology, social sciences, etc.), with proven experience of at least 5 years in the preparation of social safeguard instruments.

He /she shall:

- Possess good knowledge of the World Bank's Environmental and Social Framework (ESF) and requirements for procedures and operations in the field of environmental and social studies and excellent knowledge of environmental standards and regulations in the field of environmental and social studies;
- Have knowledge of social and employment policies, laws and regulations relevant to The Gambia, including procedures for land acquisition and involuntary resettlement;
- Understand issues that require a good understanding of the issues, characteristics and locations of pastoralist and traditional communities, conflict risks, inclusive engagement practices, gender-related risks and other vulnerable groups.

- Understand how to engage traditional communities and understand sensitivities related to traditional livelihoods, and also the languages and customs of those who practice transhumance.
- Have experience in inclusive and accessible public consultations, including complaint management mechanisms and disclosure;
- Know the context of The Gambia related to gender-based violence, sexual exploitation and abuse (including sexual exploitation and abuse of children, women and men, employment issues (including child labor, trafficking and labor exploitation, and the impacts of labor influxes), community health and safety, livelihood issues (including pastoralism), and property and livelihood issues, including their gender aspects, access to land and natural resources, disparities in land use and living conditions, problems of unemployment, especially among young people and women, lack of work, poverty, domestic violence, exploitation of human resources, etc.
- Be aware of the risks associated with the global COVID-19 pandemic
- Working knowledge of English (written and spoken). Knowledge of local languages is an asset.

b) The environmental consultant must be an environmental assessment expert holding at least a master's degree in a relevant field related to environment including occupational health and safety (e.g., environmental sciences, environmental engineering, biological sciences, etc.), with at least 5 years of experience in the preparation of environmental safeguards instruments.

He/she shall:

- Good knowledge of the World Bank's environmental and social framework
- Relevant knowledge of policies, laws and regulations related to environmental risk assessment and management, including occupational health and safety, biodiversity and natural resources at the national level of Gambia, and at the regional and international levels;
- Experience in inclusive and participatory public consultations
- Know the risks related to the global COVID-19 pandemic and how to mitigate them for public consultations
- Have a working knowledge of English (written and spoken). Knowledge of local languages is an asset.

D. Reports, Deliverables and Timelines

The consultants will prepare and submit to GBoS through the PCU for review: (i) screening report of the potential impact of the proposed rehabilitation of GBoS building; ii) draft Environmental and Social Management Plan (ESMP), (iii) draft Stakeholder Engagement Plan (SEP) which was prepared already but needs to be revised to reflect the new World Bank SEP Template and ensure it is in line with the Stakeholder Engagement Framework (SEF) and (iv) the Labor Management Plan (LMP). It is expected that the Consultants will complete the 3 instruments within a maximum of 30 days.

Scale of payments

- 30% upon contract signing: **xxx 2023**

- 10% upon submission of the report describing the screening of the potential impact of the proposed rehabilitation of GBoS building;
- 50% upon submission of the first draft of ESMP (with an SEA/SH prevention and response action plan), SEP and LMP: **xx 2023**
- 10% to the submission of the final reports of the above-mentioned instruments:¹⁴ **the xx 2023**

APPENDIX A: ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) FOR THE REHABILITATION OF GBOs OFFICE AND PROVISION OF FURNITURE AND EQUIPMENT

The Environmental and Social Management Plan (ESMP) is based on the approved U-ESMF which provides guidance for screening the potential impact of the proposed rehabilitation of the GBoS building. Results from the screening exercise will inform the design of the ESMP. It will include a waste management plan and a Sexual Exploitation and Abuse and Sexual Exploitation Action Plan which are to be used during project implementation and operation.

The ESMP shall consist of the set of mitigation, monitoring, and institutional measures to be taken during the implementation and operation of the project to eliminate adverse environmental and social risks and impacts, (including those related to SEA/SH) offset them or reduce them to acceptable levels. The ESMP will also include the measures and actions needed to implement these measures.

For the civil works (renovation of the GBoS Building) and provision of furniture and equipment supported by the Project in The Gambia, there shall be information in the ESMP which shall (a) identify the set of measures to potentially adverse impacts; (b) determine requirements for ensuring that those mitigation measures are made effectively and in a timely manner; and (c) describe the means for meeting those requirements.

APPENDIX B: LABOR MANAGEMENT PLAN (LMP)

Use the template provided in the link in section 3.2 above for Labor Management Plan (LMP) and review the ESS2 and the Borrower's guidance note for ESS2 in the link in section 3.1.

The LMP is based on the U-LMPF and will be in line with the Bank's new template for moderate risk projects. It will contain chapters under the following topics;

1. Overview Of Labor Use On The Project
2. Assessment Of Key Potential Labor Risks
3. Brief Overview Of Labor Legislation

¹⁴ To see pages 3-11, World Bank Environmental and Social Policies for Investment Project Financing. In addition, To see The article 48, p. 9: "The Bank will ask the Borrower to prepare, submit to the Bank for approval, and the implementation of work a procedure that allows Adaptive management of proposed changes in the event of unforeseen circumstances. The agreed adaptive management process will be defined in EASP. The process will specify how these changes or circumstances are to be managed and reported, and how any necessary changes will be made to the EASP and management tools used by the Borrower.

4. Policies And Procedures
5. Labor Grievance Mechanism for direct and contracted workers including community workers

APPENDIX C: OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP)

The Stakeholder Engagement Plan is to be based on the Stakeholder Engagement Framework which has already been approved by the Bank. It was submitted to the Bank but needs to be revised to ensure that it is in line with the Bank's new SEP Template and the SEF.

It will contain a chapter on Project Description, Objective of the SEP, Stakeholder Identification and Analysis, Stakeholder Engagement Program, Resources, Grievance Mechanism and Monitoring and Reporting.

Annex 4: Waste Management Plan

WASTE MANAGEMENT

Proper construction/installation of furniture and equipment waste management is valuable for several reasons:

- **It promotes environmental responsibility:** It keeps excessive waste and toxic materials out of our air, soil and water.
- **It supports public health:** It keeps hazardous materials away from areas where people could come into contact with them and become ill.
- **It encourages sustainability:** It enables reuse and recycling of many materials and slows natural resource consumption.

ELECTRONIC WASTE (E-WASTE)

E-waste or Electronic waste and is defined as any end-of-life or end-of-use piece of “equipment which is dependent on electrical currents or electromagnetic fields to work properly”. It covers a broad range of electronic devices, ranging from large household appliances, information technology and telecommunications equipment, lighting equipment, medical devices, monitoring and control instruments, automatic dispensers, and consumer electronics, such as electrical and electronic tools, toys, leisure and sports equipment, and mobile phones to computers. Components of electric and electronic equipment (EEE), such as batteries, electric cables from end-of-life vehicles (ELVs), printed circuit boards (PCBs), plastic casings, cathode-ray tubes (CRTs), activated glass, and lead capacitors are also classified as e-waste. Possible waste electric and electronic equipment to be covered by this sub-project may include computers, scanners, printers, servers, copiers, electric cables, backup generators, etc. E-waste contains materials that, if mishandled, can be hazardous to human health and the environment, but, most importantly, also materials that are valuable and scarce. E-waste is one of the fastest growing waste streams worldwide, growing at a rate of 3–5% per year simply because of the market demand. The market demand for production of EEE is continuously increasing, but the life span/replacement interval of such products continues to decline in the course of technological evolution. The proper treatment of e-waste avoids negative impacts and yields many benefits. E-waste, if not properly treated, can have negative impacts, both on human health and on the environment. However, sustainable treatment of e-waste

avoids these negative impacts. The appropriate handling of e-waste can both prevent serious health and environmental damage and recover valuable materials, especially common metals and precious metals. For this project, such waste can include servers, modems, computers, monitors, and other digital devices. Many of these products can be reused, refurbished, or recycled. However, electronic discard can also be another way of handling these e-wastes.

A. TYPES OF WASTE EXPECTED DURING THE REHABILITATION/CONSTRUCTION ACTIVITIES

1. Surplus Concrete/mortar
2. Plastic packaging
3. Empty cartons
4. Empty cement packaging
5. Broken blocks
6. Wood
7. Iron rods/Nails
8. Dredging waste (shrubs, vegetation etc.)
9. Empty Paint cans
10. Empty Paint thinner bottles
11. Waste corrugate portions
12. Empty Pesticide Containers
13. Surplus excavated soil, Sand and gravel
14. Broken Tiles
15. Debris from chipped walls and removal of old flooring
16. Damaged electrical and Plumbing fittings
17. Old doors and windows

PESTICIDES

Pesticides include insecticides, rodenticides, surface disinfectants, animal repellent and insect repellent. Should the Contractor find it necessary to use pesticides in work areas of this contract, he shall do so safely and efficiently. If any product remains in the container, it must be disposed of as household hazardous waste. The containers should be rinsed adequately so as to reduce the chances of soil contamination when buried.

TOXIC SUBSTANCES IN E-WASTE

No.	Substance	Occurrence in E-waste
Halogenated Compounds		
1	<p><u>TBBA (tetrabromo-bisphenol-A)</u> <u>PBB (polybrominated biphenyls)</u> <u>PBDE (polybrominated diphenyl ethers)</u></p> <p>Combustion of halogenated case material and printed wiring boards at lower temperatures releases toxic emissions, including dioxins, which can lead to severe hormonal disorders.</p>	<p>Fire retardants for plastics (thermoplastic components, cable insulation) TBBA is presently the most widely used flame retardant in printed circuit boards</p>
2	<p><u>Chlorofluorocarbon (CFC)</u> - when released into the atmosphere, they accumulate in the stratosphere and have a deleterious effect on the ozone layer. This results in an increased incidence of skin cancer in humans and in genetic damage in many organisms.</p>	<p>Cooling unit, Insulation foam</p>
3	<p><u>PVC (polyvinyl chloride)</u> - is hazardous because it contains up to 56% chlorine. When burned, it produces large quantities of hydrogen chloride gas, which combines with water to form hydrochloric acid and is dangerous because when inhaled, it leads to respiratory problems.</p>	<p>Cable insulation</p>
Heavy metals and other metals:		
4	<p><u>Arsenic</u> - Chronic exposure to arsenic can lead to various diseases of the skin, decrease nerve conduction velocity and lung cancer</p>	<p>Small quantities in the form of gallium arsenide within light emitting diodes</p>
5	<p><u>Barium</u> - Short-term exposure to barium could lead to brain swelling, muscle weakness, damage to the heart, low blood potassium, cardiac arrhythmias, respiratory failure, gastrointestinal dysfunction, paralysis, muscle twitching, and elevated blood pressure, liver, and spleen.</p>	<p>Getters in cathode ray tubes (CRTs)</p>
6	<p><u>Beryllium</u> - can also affect organs such as the liver, kidneys, heart, nervous system, and lymphatic system may develop beryllium</p>	<p>Power supply boxes which contain silicon-controlled rectifiers and x-ray lenses</p>

	sensitization or chronic beryllium disease. Exposure to beryllium also causes a form of skin disease that is characterized by poor wound healing and wart-like bumps.	
7	<u>Cadmium</u> - Acute exposure to cadmium fumes causes flu-like symptoms of weakness, fever, headache, chills, sweating and muscular pain. The primary health risks of long-term exposure are lung cancer and kidney damage. Cadmium also is believed to cause pulmonary emphysema, possibly reproductive damage, and bone disease (osteomalacia and osteoporosis).	Rechargeable computer batteries, fluorescent layer (CRT screens), printer inks and toners, photocopying-machines (printer drums)
9	<u>Chromium VI</u> - Chronic exposure to chromium (VI) compounds can cause permanent eye injury unless properly treated, human carcinogens, impacts on neonates, and reproductive and endocrine functions. Chromium VI may also cause DNA damage.	Data tapes, floppy-disks
10	<u>Lead</u> - Short-term exposure to high levels of lead can cause vomiting, diarrhoea, convulsions, coma or even death. Other symptoms are appetite loss, abdominal pain, constipation, fatigue, sleeplessness, irritability, and headache. Continued excessive exposure, as in an industrial setting, can affect the kidneys.	CRT screens, batteries, printed wiring boards, television sets, PC monitors, light bulbs, lamps
11	Lithium	Li-batteries
12	<u>Mercury</u> - bio-accumulates, causing brain and liver damage if ingested or inhaled.	Fluorescent lamps that provide backlighting in LCDs, in some alkaline batteries and mercury wetted switches
13	Nickel	Rechargeable NiCd-batteries or NiMH-batteries, electron gun in CRT
14	Rare Earth elements (Yttrium, Europium)	Fluorescent layer (CRT-screen)
15	<u>Selenium</u> - Exposure to high concentrations of selenium compounds causes selenosis. The major signs of selenosis are hair loss; nail brittleness, and neurological abnormalities (such as numbness and other odd sensations in the extremities).	Older photocopying-machines (photo drums)

16	Zinc Sulphide	Interior of CRT screens, mixed with rare earth metals
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B. CLEAN-UP AND DISPOSAL OF WASTE MATERIALS

i. Clean – Up

The Contractor shall, at all times keep the construction or installation area, including storage areas used free from accumulation of waste material or rubbish. All new and unused materials should be stored in an organized manner in the temporary storage facility on site. Waste should be segregated at an identified area on site away from people for safety. Arrangements should be made by the Contractor or Supplier to ensure weekly disposal of all waste (from construction or installation of equipment) by the Kanifing Municipal Council (Regional Council responsible for waste disposal in the Municipality) is recommended.

Prior to the completion of the work, the Contractor or Supplier (in the case of provision of furniture and equipment) shall remove from the vicinity of the work, all waste materials, unused materials, concrete forms and other related material, belonging to him or used under his directions during construction or installation. All work areas shall be graded and left in a neat manner conforming to the natural appearance of the landscape as it was before disturbance.

Failure to carry out the above recommendation, the work may be performed by the Client at the expense of the Contractor or Supplier, and his surety or sureties shall be liable, therefore.

ii. Disposal of Waste Material

1. Construction Waste

Waste materials including, but not restricted to refuse and garbage shall be disposed of by the Contractor or Supplier. Sometimes the plastic packaging and empty cartons can be reused by the community members. However, to avoid littering on site, excess of these wastes should be disposed of efficiently. Debris from chipped walls can be used to backfill the land around the site and compacted properly after completion of the works. Surplus Concrete and mortar should be hardened on a surface first prior to disposal. Surplus excavated soil if existing after completion of the works should be spread evenly on the ground onsite. Leftover sand and gravel should be disposed of offsite by the Contractor.

2. Electronic Waste (E-Waste)

E-waste management should be addressed through an e-waste management system that addresses issues linked to e-waste, which include generation, waste management (reduction, reuse, recycling), transportation, disposal, and monitoring.

As part of the E-waste Management Plan (EWMP), e-waste should be characterized according to composition, sources, types of e-waste and generation rates. Effective planning and implementation of e-waste management strategies should include: i) Revision of new e-waste sources during all project phases including planning, siting, and equipment upgrades, in order to identify e-waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure; ii) Collection of data and information about the process and e-waste streams in existing facilities, including characterization of e-waste streams by type, quantity, and potential use/disposition; iii) Establishment of priorities based on a risk analysis that takes into account the potential Environmental Health and Safety (EHS) risks during the e-waste cycle and the availability of the infrastructure to manage the e-waste in an environmentally sound manner; iv) Definition of opportunities for source reduction, as well as for reuse and recycling; v) Definition of procedures and operational controls for onsite storage; and, vi) Definition of options/procedures/operational controls for treatment and final disposal.

Hazardous e-waste should always be segregated from non-hazardous e-wastes. If the generation of hazardous e-waste cannot be prevented through the implementation of the above general e-waste management practices, its management should focus on the prevention of harm to health, safety, and the environment, according to the following additional principles: i) Understanding potential risks and impacts associated with the management of any generated hazardous e-waste during its complete life cycle; ii) Ensuring that the contractor or supplier handling, treating, and disposing of hazardous e-waste are reputable and legitimate enterprises, licensed by the relevant regulatory agency and following good international industry practice for the e-waste being handled; iii) Ensuring compliance with applicable local and international regulations and WB ESHG.

An average person involved in e-waste management can recognize hazardous e-waste by looking for warning labels or markings on the device, such as a "crossed-out trash can symbol" or the word "danger." These labels are often found on electronic devices that contain hazardous materials, such as lead, mercury, or other toxic chemicals. In addition, hazardous e-waste may also be identified by the presence of certain

materials or substances, such as batteries, toner or ink cartridges, and old television sets and computer monitors. These items may contain hazardous materials that can be harmful to human health and the environment if they are not handled and disposed of properly.

If a person is unsure whether a particular electronic device is hazardous e-waste, he or she can check the manufacturer's website or contact them directly to find out more about the materials used in the device and how to properly dispose of it. He or She can also consult the Kanifing Municipal Council or National Environmental Agency for guidance on e-waste disposal.

If e-waste materials are still generated after the implementation of feasible e-waste prevention, reduction, reuse, recovery, and recycling measures; then, e-waste materials should be treated and disposed of following all measures to avoid potential impacts to human health and the environment. Selected management approaches should be consistent with the specifications of e-waste characteristics and local regulations and may include one or more of the following: i) On-site or off-site chemical or physical treatment of the e-waste material to render it non-hazardous prior to final disposal; ii) Treatment or disposal at permitted facilities specially designed to receive the e-waste; iii) Permitted and operated landfills or disposal facilities designed for the respective type of e-waste or other methods known to be effective in the safe, final disposal of e-waste materials.

The project will avoid E-waste's disposal by reusing, recycling, and recovering. Where E-waste cannot be reused, recycled, or recovered then the project will treat, destroy, or dispose of E-waste in accordance with ESS 1 and ESS 3, and the guidelines prescribed by the National Authorities. That is, when hazardous waste management is conducted by third parties, the program will ensure all E-waste will be disposed of in hazardous waste landfill or licensed disposal facilities in accordance with the Environmental Management Regulations.

CONSTRUCTION WASTE MANAGEMENT PLAN

Environmental / Social Impact	Proposed Mitigation and Aspect for Monitoring	Responsibility for intervention and implementation	Responsibility for mitigation monitoring	Recommended frequency of monitoring
Construction waste	<ul style="list-style-type: none"> Proper disposal of construction wastes including solid wastes and debris 	Contractor	PIU Environmental Specialist	Monthly
Workmanship	<ul style="list-style-type: none"> provide adequate sanitation and solid waste disposal facilities for workers on site. 	Contractor	PIU Environmental and Social Specialists	Monthly
Demobilization	<ul style="list-style-type: none"> Clean up site Remove all debris Return earth to original condition 	Contractor	PIU Environmental Specialist	Final inspection (once) and before issue of certificate of completion
Public Health and Occupational safety	<ul style="list-style-type: none"> Proper disposal of solid and sanitary waste on site. 	Contractor	PIU Environmental & Social Specialists	Monthly for RCM

E-WASTE MANAGEMENT PLAN

Impact	Mitigation Measures	Monitoring	Responsibility
<p>Air Pollution through Improper Disposal</p> <p>Which leads to release of toxic, hazardous, and carcinogenic gases.</p> <p>Human Health</p>	Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices.</p>	PIU Environmental Specialist and NEA

<p>Electrical and electronic equipment contain different hazardous materials, which are harmful to human health. For instance, bio-accumulative toxins (PBTs) have been associated with cancer, nerve damage and reproductive disorders. Chronic exposure to arsenic can cause lung cancer and can often be fatal. Also, exposure to barium can lead to brain swelling, muscle weakness, damage to the heart, liver, and spleen.</p> <p>Pollution of Water Bodies</p> <p>Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment including ground and surface water if not disposed of carefully.</p>	<p>Reuse and recycle all E-waste where applicable and possible.</p> <p>Establish E-Waste collection points on site, including collection bins/receptacles.</p> <p>Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>	<p>Availability of E-waste receptacles on site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste.</p>	
<p>Pollution of Land Resources including Landfills</p> <p>Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment including soil if not disposed of carefully.</p>	<p>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. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.</p> <p>Reuse or Recycle all E-waste.</p> <p>Establish E-Waste collection points on site, including collection bins/receptacles.</p> <p>Use contractors with a knowledge of licensed hazardous waste landfill sites/disposal facilities.</p>	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices.</p> <p>Availability of E-waste receptacles on site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste.</p>	<p>PIU Environmental Specialist and NEA</p>

	<p>Create and maintain records of all E-waste items for disposal, securely store and prepare for shipment correctly.</p> <p>Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>		
<p>Growth of Informal E-waste Disposal Centers</p> <p>Improper and indiscriminate disposal of E-waste is likely to lead to the exponential increase of informal waste disposal centers in communities near the project site which may further exacerbate the problem of E-waste.</p>	<p>Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.</p> <p>Reuse or Recycle all E-waste.</p> <p>Establish E-Waste collection points on site, including collection bins/receptacles.</p> <p>Use contractors with a knowledge of licensed hazardous waste landfill sites/disposal facilities.</p> <p>Create and maintain records of all E-waste items for disposal, securely store and prepare for transport correctly.</p> <p>Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.</p>	<p>Warranty and take back schemes for Electronic Devices purchased.</p> <p>Credibility of manufacturers supplying the electronic devices.</p> <p>Availability of E-waste receptacles on site.</p> <p>Number of awareness and training conducted for users of electronic devices on E-waste.</p>	<p>PIU Environmental Specialist and NEA</p>