

**INTEGRATED SAFEGUARDS DATA SHEET  
APPRAISAL STAGE**

**Report No.: ISDSA6379**

**Date ISDS Prepared/Updated:** 03-Apr-2014

**Date ISDS Approved/Disclosed:** 04-Apr-2014

**I. BASIC INFORMATION**

**1. Basic Project Data**

<b>Country:</b>	Ghana	<b>Project ID:</b>	P145741
<b>Project Name:</b>	Ghana Secondary Education Improvement Project (P145741)		
<b>Task Team Leader:</b>	Deborah Newitter Mikesell		
<b>Estimated Appraisal Date:</b>	21-Mar-2014	<b>Estimated Board Date:</b>	20-May-2014
<b>Managing Unit:</b>	AFTEW	<b>Lending Instrument:</b>	Investment Project Financing
<b>Sector(s):</b>	Secondary education (100%)		
<b>Theme(s):</b>	Education for all (50%), Education for the knowledge economy (50%)		
<b>Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?</b>			No
<b>Financing (In USD Million)</b>			
Total Project Cost:	155.00	Total Bank Financing:	155.00
Financing Gap:	0.00		
<b>Financing Source</b>			<b>Amount</b>
BORROWER/RECIPIENT			0.00
International Development Association (IDA)			155.00
Total			155.00
<b>Environmental Category:</b>	B - Partial Assessment		
<b>Is this a Repeater project?</b>	No		

**2. Project Development Objective(s)**

The Project Development Objective is to increase access to upper secondary education in underserved school districts and improve quality in low-performing senior high schools in Ghana.

**3. Project Description**

The proposed project would support senior secondary education through a five-year US\$155 million Investment Project Financing (IPF) instrument using a results-based-funding approach.

Component 1: Support to Increase Access with Equity and Quality in SHS (estimated cost US\$140.4 million)

Component 1 uses a results-based financing (RBF) modality. Disbursements up to a capped absolute amount will be made against specific line items in the Education sector annual budgets, referred to as eligible expenditure programs (EEPs). These disbursements will be conditioned on achievement of specified results, as measured by disbursement-linked indicators (DLIs). A matrix of indicators has been developed to measure performance annually and monitor the results achieved.

Policies and interventions to be supported under the first component of SEIP are grouped into two pillars: (i) increasing access with equity (geographic, gender, poverty, etc.); and (ii) enhancing quality of low performing SHS.

**Pillar 1: Increase Access with Equity:** The objective of this pillar is to improve access to senior secondary education and improve equity in underserved districts and subsidize students especially girls and those from low income households. This pillar will support and monitor key activities to accomplish these goals through the construction of new schools and the improvement and expansion of existing schools where demand is high and the schools have inadequate facilities to absorb and retain students.

The SEIP is expected to finance results of the Government's program to expand space through the construction of new senior secondary schools in underserved areas, rehabilitation and expansion of existing low performing schools and through support for SHS attainment of disadvantaged students. The Government plans include new construction in the 14 districts where there are no current operating public SHS. In addition, using the agreed selection criteria for eligible student population compared with available school capacity (effective demand) combined with district level poverty indicators, an additional number of districts have been identified for new construction. The ultimate objective is to create new spaces for those demanding seats in SHS and to fill these spaces with new students coming from previously underserved communities. In addition to new schools, this component would focus on improving existing SHS, particularly those with capacity for expansion, meeting criteria of school age population not attending SHS, and poverty criteria in addition to a needs assessment which will determine level of deficiency (bathrooms, science labs, computer facilities, etc.). This pillar will improve the government's targeting of resources to support increased access focusing on the first several years of the longer term secondary education strategy (which aims for universal access). Demand side investments to encourage girls' attendance and subsidize poorer students will also be expected to contribute to improving access and equity.

Given the operation's focus on under-served areas and promoting access with equity, disbursement will be linked to indicators (disbursement linked indicators) that measure increases in seat availability in these targeted locations for new construction. In addition a second indicator would be used to measure progress of utilization of existing schools where new seats are made available in selected schools. Targeting resources for girls and students from low income families in underserved communities would strengthen equity reforms. The release of IDA credit funds will be linked to achievement of the following DLIs: (i) selection based on targeting of school expansion in underserved school districts (DLI1); (ii) increasing new seats for SHS students in underserved school districts (DLI 2); (iii) increasing utilized seats in existing low-performing schools (DLI 3); and (iv) increasing enrolment in SHS in targeted districts (for girls and low-income students) (DLI 4).

Pillar 2: Enhancing Quality in low-performing Senior High Schools: The objective of this pillar is to improve the quality of SHS, with a focus on math and science education in selected low performing schools. The SEIP would also strengthen school management, leadership and expansion of ICT in the selected schools. The low performing schools typically have inadequate: infrastructure, management, equipment, learning resources and sources of internally generated funding. In order to improve quality, the Project will support the government's program to (i) strengthen school management, leadership and accountability; (ii) target interventions to improve the quality of science and math education; and (iii) introduce School Performance Partnerships based on School Improvement Plans. In addition to school-based quality inputs, training and financing, this pillar will support the systematic collection and publication of school data for stakeholders, (i.e., parents, guardians and wards to make better informed decisions about the choice of senior secondary school to attend.

The School Performance partnerships would develop mutual accountability between school management and the MOE to improve learning performance with the commitment from government agencies to provide the necessary resources and the responsibility of schools to implement quality improvement activities with verifiable outcomes.

The focus on math and science subjects is aligned with the government strategy to encourage these program areas throughout all education levels (STEM policy citation). The expansion of ICT wireless connectivity would also allow strengthened science, math and other subject education through digital content for teachers and students. Schools will have access to an education portal where teachers and students can utilize multiple online resources that are expected to support improved teaching and learning. ICT will be used for intensive in-service support to teachers to improve content knowledge as well as lesson plan preparation, teaching and learning aids, and videos on good teaching practices and classroom management. The portal could also serve as a platform for knowledge exchange with national and international networks and for participation in relevant discussion forums. The SEIP will provide connectivity to an additional 125 secondary schools.

As an intermediate result, completion rates in the targeted schools would be expected to increase. A longer term impact would be an increase in student achievement as measured by performance in the WASSCE which is a year 4 DLI. For this pillar, release of IDA credit funds would be linked to the achievement of the following DLIs: (i) annual publication of School Performance Report (DLI 5); (ii) School Performance Partnerships in 125 beneficiary schools (DLI 6); and (iii) improved learning outcomes in low-performing beneficiary schools (DLI 7).

Component 2: Management, Research and Monitoring and Evaluation (estimated total cost US\$14.6 million): This component aims to strengthen the implementation capacity of the Ministry of Education and Ghana Education Service and its related implementing agencies and assist them to achieve the objectives of the Government's SHS strategy. This component will support monitoring and evaluation, coordination, planning, communication, financial management, procurement, and safeguards. In addition it will support an active and evolving research agenda to continue to inform Government SHS policy, particularly with regard to financing, social targeting, quality initiatives, teacher rationalization, and curriculum relevance. This component would complement implementation of the program pillars with ongoing analyses, strengthening data collection for school mapping, and establish priorities for new construction, renovations and maintenance. The establishment of a web platform for school reporting and real time monitoring of all SHS implementation activities would enhance and strengthen the Education Management Information System (EMIS) and ongoing school mapping in order to help government report on achievement of results. In addition, funding will be provided to support the independent verification of disbursement

linked indicators and achievement of results. Support would also be provided to help the MOE to design and realize policy reforms, including piloting and evaluating innovative approaches. This component would finance training, recruitment of short and long-term technical experts, procurement of goods needed for specific activities, and incremental operating costs.

#### **4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)**

The project supports the Government strategy to expand access to secondary education in underserved communities by constructing new schools, expanding enrollment in under subscribed and low performing schools, and targeting girls and students from low income families to attend SHS. The project also aims to improve the quality of existing selected low performing schools. The expected increases in enrollment and learning outcomes are targeted to previously underserved communities and schools that are neediest.

Environment and social safeguards issues are addressed using an Environment and Social Management Framework (ESMF). New school construction will be supported under the project and the sites are not yet known. Therefore, a Resettlement Policy Framework is also prepared. Site selection for school construction will seek to encourage equity targeting while avoiding resettlement.

#### **5. Environmental and Social Safeguards Specialists**

Kenneth M. Green (OPSOR)

Paula F. Lytle (AFTCS)

<b>6. Safeguard Policies</b>	<b>Triggered?</b>	<b>Explanation (Optional)</b>
Environmental Assessment OP/ BP 4.01	Yes	Potential environmental and social impacts resulting from project activities are related to school infrastructure rehabilitation, expansion and new construction. These planned activities trigger the Environment Assessment OP 4.10. Since the exact location of investments and/or services is not yet known, Government of Ghana has finalized an Environmental and Social Management Framework (ESMF) which was disclosed. Environmental and Social Management Plans will be prepared during project implementation.
Natural Habitats OP/BP 4.04	No	This project does not involve or affect natural habitats.
Forests OP/BP 4.36	No	This project does not involve or affect forests or forestry.
Pest Management OP 4.09	No	This project does not involve pest management.
Physical Cultural Resources OP/ BP 4.11	No	This project does not involve physical cultural resources.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project areas.
Involuntary Resettlement OP/BP	Yes	Resettlement policy will be triggered as school

4.12		construction may require land acquisition. A Resettlement Policy Framework (RPF) was finalized by the government, consulted upon, and disclosed in country and at the World Bank Infoshop. Once sites are selected during implementation, RAPs will be prepared in line with the RPF, and when necessary. The adoption of the RPF guidelines and procedures will be validated during year 0 disbursement linked indicators. Resettlement audits will be conducted for sites which are already acquired or in the process of acquisition between the Districts and MoE.
Safety of Dams OP/BP 4.37	No	N/A
Projects on International Waterways OP/BP 7.50	No	N/A
Projects in Disputed Areas OP/BP 7.60	No	N/A

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

<p><b>1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:</b></p> <p>The components of the Ghana SEIP will be implemented by various organizations including Government agencies, District Administrations, Architectural firms, and Construction Contractors. The environmental concerns require that some aspects of project design and implementation and tender and contractual document preparation should be environmentally sensitive. The organization for the construction activities and implementation of the Ghana SEIP, will screen for site selection; potential environmental and social impacts; mitigation of impacts; and to be able to outline steps for monitoring of potential impacts, with a process for triggering subsequent environmental and / or social assessments, where necessary.</p> <p>There are no large scale, significant or irreversible impacts.</p>
<p><b>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</b></p> <p>There are no indirect and/or long term impacts due to any activities in the project area.</p>
<p><b>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</b></p> <p>For those new school subprojects, there will be screening and site selection provisions followed that address negative environmental and social impacts applied on a one by one basis. Land acquisition will be avoided, siting in low lying areas with potential flooding or in sensitive habitats will be prohibited. The MoE also has in place an existing screening form to avoid land acquisition where there are land disputes or where the land has cultural heritage or sacred sites.</p>

<p><b>4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.</b></p>
<p>The MOE will be responsible for establishing a set of procedures in a to- be- developed Technical Planning Guidelines that covers all aspects for new school construction as well as rehabilitation including the environmental clauses to be inserted in contractors' bidding documents. In addition, MOE has already updated its environmental and social due diligence processes with a site selection screening form and clarified all EPA submission and permit requirements. These procedures are integrated with the principles established in the RPF in terms of land allocation etc. MOE is committed to improving its capacity across these procedures by hiring environmental and social specialists, conducting training across national, district and contractor actors as well as other key community stakeholders.</p> <p>All school construction activities including design and site selection, community engagement, construction etc. will be documented and tracked over time for satisfactory completion of all environmental and social requirements via internal and external third party audits and reporting</p>
<p><b>5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.</b></p>
<p>A team consisting of the staff of Ministry of Education and representatives of the Environmental Consulting Firm collected data for the consultations. Community opinion leaders such as assemblymen/women, faith based organization leaders, youth leaders, chiefs, or headmen served as key contacts to encourage meeting attendance. Meetings held at the community center were interactive, with questions from the communities and answers and explanations from the consultant and Ministry of Education Staff. The main issues discussed were regarding compensations, job creation, and provision of schools.</p>

### ***B. Disclosure Requirements***

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	29-Mar-2014
Date of submission to InfoShop	31-Mar-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
<i>Comments:</i>	
<b>Resettlement Action Plan/Framework/Policy Process</b>	
Date of receipt by the Bank	01-Apr-2014
Date of submission to InfoShop	01-Apr-2014
"In country" Disclosure	
<i>Comments:</i>	
<b>If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	

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### C. Compliance Monitoring Indicators at the Corporate Level

<b>OP/BP/GP 4.01 - Environment Assessment</b>			
Does the project require a stand-alone EA (including EMP) report?	Yes [ <input type="checkbox"/> ]	No [ <input checked="" type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>OP/BP 4.12 - Involuntary Resettlement</b>			
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>The World Bank Policy on Disclosure of Information</b>			
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
<b>All Safeguard Policies</b>			
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Have costs related to safeguard policy measures been included in the project cost?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [ <input checked="" type="checkbox"/> ]	No [ <input type="checkbox"/> ]	NA [ <input type="checkbox"/> ]

### III. APPROVALS

Task Team Leader:	Name: Deborah Newitter Mikesell	
<b>Approved By</b>		
Regional Safeguards Advisor:	Name: Alexandra C. Bezeredi (RSA)	Date: 03-Apr-2014
Sector Manager:	Name: Peter Nicolas Materu (SM)	Date: 04-Apr-2014