

**FEDERAL REPUBLIC OF NIGERIA  
WORLD BANK**

**PROGRAM-FOR-RESULTS FINANCING**

**NIGERIA HOPE-QUALITY BASIC EDUCATION FOR ALL  
PROGRAM-FOR-RESULTS (HOPE-EDU PforR)**

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

**Draft Final**

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## LIST OF ACRONYMS

ASC	Annual School Census
BLP	Basic Literacy Program
CST	Coordination Support Team
DLI	Disbursement-Linked Indicator
DLR	Disbursement-Linked Result
ECE	Early Childhood Education
E&S	Environment and Social
ENB	Environment, Natural Resources and Blue Economy
ESSA	Environmental and Social Systems Assessment
ESMP	Environment and Social Management Plan
FMEEnv	Federal Ministry of Environment
FMFBNP	Federal Ministry of Finance Budget and National Planning
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GoN	Government of Nigeria
GRM	Grievance Redress Mechanism
HCI	Human Capital Index
HOPE	Human Capital Opportunities for Prosperity and Equality
ICT	Information Communications Technology
IDPs	Internal Displaced Persons
IPF	Investment Project Financing
ISR	Implementation Status and Results Report
JONAPWD	Joint National Association of Persons with Disabilities
LGA	Local Government Area
LGEA	Local Government Education Authority
MDA	Ministries, Departments and Agencies
MICS	Multiple Indicator Cluster Survey
NCT	National Coordination Team
NERDC	National Education Research and Development Council
NFLC	Non-Formal Learning Centres
NGF	Nigeria Governor's Forum
NIN	National Identification Number
NPMT	National Policy and Monitoring Team
OOSC	Out-of-School Children
PAP	Program Action Plan
PCU	Program Coordinating Unit
PDO	Program Development Objective
PforR	Program-For-Results
PLP	Post Literacy Program
RA	Result Area
RANA	Reading and Numeracy Activity
SABER	State Action and Business Enabling Reforms
SAME	State Agency for Mass Education
SFTAS	State Fiscal Transparency Accountability and Sustainability
SMEnv	State Ministry of Environment
SMoF	State Ministry of Finance
SPP	Structured Pedagogy Program

SUBEB	State Universal Basic Education Board
TA	Technical Assistance
TaRL	Teaching at the Right Level
TLM	Teaching and Learning Material
TSO	Teacher Support Officer
UBE	Universal Basic Education
UBEC	Universal Basic Education Commission

## EXECUTIVE SUMMARY

1. Nigeria's human development outcomes are among the lowest in the world. Nigeria's human capital index (HCI), according to the World Bank's Human Capital Index (HCI), is 0.36, positioning it substantially below the average for Sub-Saharan Africa (0.40) and lower-middle-income countries worldwide (0.48). Nigeria's HCI of 0.36 implies that a child born in Nigeria can be expected to achieve only 36 percent of her or his potential productivity if current levels education services remain unchanged. In education, a child who starts school at age four can expect to complete 10.2 years of school by her 18th birthday; but if one factors in what is actually learned, the expected years of school are only five.
2. In addition, Nigeria has the world's largest population of out-of-school children (OOSC). Children who attend non-formal education only or do not attend any form of education are both categorized as being out-of-school. Of the estimated 60.3 million children aged 5-14 years, there are an estimated 14.8 million OOSC (or 27 percent). Importantly, an estimated 45.8 million children aged 5-14 years are unable to read and understand a simple text even as the quality of teaching is poor. At the pre-primary level, only 28 percent of students have access to instructional materials for English studies, and 24 percent for mathematics.
3. Majority of Children with disabilities are OOSC in Nigeria. Studies have revealed that up to 3.5 million children with disabilities are currently out-of-school, while a study done by the Joint National Association of Persons with Disabilities (JONAPWD) indicated that 95 per cent of children with disabilities are out of school. They are often neglected, and there are no deliberate approaches to integrate them into development programs.
4. To deal with these problems and more under basic education in Nigeria, the World Bank is proposing to support the Government of Nigeria (GoN) with a Program for Results (PforR) instrument referred to as Nigeria Human Capital Opportunities for Prosperity and Equality Program-For-Results (HOPE)- Quality Basic Education for All Program-For-Results (HOPE-Edu PforR) (hereafter, the Program). The proposed operation is a hybrid that will include a part allocated to technical assistance (TA), which uses an Investment Project Financing (IPF) instrument. The HOPE-Education operation will be financed by a World Bank IDA credit of US\$500 million and a GPE grant of US\$52.2 million.
5. The Program is expected to directly benefit 29 million children enrolled at public primary schools; 500,000 public primary teachers; and more than 65,000 public primary schools as well as their school-based management committees (SBMCs) who will cater to their students and teachers. Program beneficiaries will also include another 1.5 million children who will enroll in accelerated non-formal basic education program in 10,000 non-formal learning centers. In addition, the program will benefit government agencies at the federal, the state and the local governments through enhanced capacities to plan, implement and monitor basic education service delivery.
6. The Program Development Objectives are to improve foundational learning outcomes, increase access to basic education and to enhance key education systems in participating States. The following PDO level indicators will measure the achievement of the result:
  - a) Percentage of children in Grade 3 who are proficient in reading, disaggregated by sex

- b) Percentage of children in Grade 3 who are proficient in mathematics, disaggregated by sex
  - c) Number of out-of-school children aged 5-14 years who have been brought into a formal or non-formal literacy and numeracy program
  - d) Number of states that digitally publish complete Annual School Census Database and Report on time.
7. The operation will be structured around three results areas:
- a) Improving quality (US\$295.84 million): This area aims to ensure that foundational literacy and numeracy are taught to students in Primary Grades 1-3 (P1, P2, P3) using a Structured Pedagogy Program (SPP) in participating States. The SPP is a coherent package of four integrated elements, which together are designed to improve classroom instruction and subsequently student performance: (i) teaching-learning materials (TLMs); (ii) teacher capacities; (iii) teacher support; and (iv) action-oriented evaluation of learning.
  - b) Increasing access (US\$134 million): This area aims to increase access to, and enrollment in, primary education in participating States through the community-supported creation of new classrooms and learning opportunities in the public formal and non-formal sectors
  - c) Enhancing key systems (US\$89.955 million): This area aims to strengthen the allocation and management of UBEIF, school management, governance and accountability; and to generate information essential to system management and performance monitoring.
8. There are ten DLIs as follows:
- a) DLI 1: Number of schools with Grades 1-3 TLMs.
  - b) DLI 2: Number of Grades 1-3 teachers able to use structured pedagogy materials.
  - c) DLI 3: Number of Grades 1-3 teachers mentored on SPP.
  - d) DLI 4: Number of LGEAs evaluating early learning results. DLI 5: Number of new primary classrooms created through community participation. DLI6: Number of children who complete NFBE program.
  - e) DLI 7: Percentage of core UBE funds managed at decentralized level.
  - f) DLI 8: Percentage of public primary schools managing annual school grant.
  - g) DLI 9: Percentage of schools included in current-year Annual School Census report.
  - h) DLI 10: Number of National Learning Assessments completed.
9. The Program will exclude activities that do not meet the World Bank's Policy on eligibility for PforR financing (September 2020). The borrower shall ensure that the Program excludes any activity that, in the opinion of the World Bank, is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented and/or requires significant land acquisition, displacement, and/or resettlement of affected people. Any Program activity that entails land acquisition, negative impact on natural habitat and cultural resources, public and worker's health and safety will not be funded under the PforR without adequate environmental and social management. For example, the program will support the procurement of civil works, and materials only when an adequate e-waste management plan is in place of the bidding document and monitored and reported regularly.
10. The Environmental and Social Systems Assessment (ESSA) examines the extent to which the Federal and State Government's existing environmental and social management systems operates within, an adequate legal and regulatory framework to guide environmental and social impact assessments, mitigation, management and monitoring at the PforR Program level. It assesses their consistency with the six 'core principles' of Program for Results Policy and

recommends actions to address the gaps and to enhance performance during Program implementation. This ESSA incorporates recognized elements of good practice in environmental and social assessment and management and thereafter defines measures to strengthen the system and recommends measures that will be integrated into the overall Program. The ESSA is undertaken to ensure consistency with six core principles and key planning elements of PforR ESSA.

11. The World Bank team prepared the ESSA through a combination of detailed reviews of existing program materials and available technical literature, including policies, regulations, guidelines and examples of due diligence and design documents, interviews and extensive consultations with government staff, non-governmental organizations, regulatory agencies, private sector organizations and sector experts associated with public revenue generation.
  
12. In line with the six core principles above, the relevant risks associated with the HOPE Program and within the proposed Result Areas (RAs) under the PforR covers environmental and social issues and include:
  - a) Increased generation of e-waste due to the deployment of digital devices for recording observations by trained observers in DLI 3 and, digitization of school-based data collection and digital submission and publication of Annual School Census data in DLI9, which will involve the use of ICT systems.
  - b) The procurement and delivery of civil works, equipment, and materials, including construction of twelve thousand new public primary classrooms in areas where there are no schools and the establishment or strengthening of Non-formal learning centers (NFLCs) to enable OOSC to complete a literacy and numeracy program through government-community partnerships arrangements in DLIs 5 could lead to negative environmental and social impacts associated with these activities, such as the generation of solid waste, noise, and air pollution.
  - c) Potential exclusion of vulnerable groups, e.g. children with disabilities, those in conflict zones, nomadic households, internally displaced persons (IDPs), etc., where there are no targeted approaches to mainstream them into the educational system.
  - d) Potential discrimination of vulnerable groups due to ethnic considerations and sexual abuse or harassment of children and women in the appointment and training of a qualified teacher in DLI 2, 3 and DLI 5 and the hiring and training the instructors in Non-Formal Learning Centers (NFLC) in DLI 6.
  - e) Conflicts and security risks could disrupt the Program implementation. Schools and teacher can be targeted by insurgents and bandits.
  - f) Resistance by member of the community who may view the Program especially for girls, as conflicting with cultural beliefs. On the contrary exclusion of stakeholders can also lead to mistrust and resistance of the Program.
  - g) The procurement and delivery of civil works, equipment, and materials could also impact workers' health and safety.
  - h) Creation of new public primary classrooms for schools and the establishment or strengthening of Non-formal learning centers (NFLCs) could result in land acquisition for building more classrooms. This could result in social risks associated with land acquisition.
  - i) Potential risk of child abuse and child labor.



13. The overall environmental and social risks have been assessed and deemed to be **Substantial**. Although the program activities are not likely to require significant changes to the borrower's overall environmental and social systems, the program was generally assessed as substantial because of the procurement of civil works and material in DLI5 , possible community land acquisition for building of classrooms, e-waste as a result of the deployment of learning packages to teachers in the form of digital devices in DLI2, deployment of digital devices for recording observations by trained observers in DLI3 and, digitization of school-based data collection and transmission in DLI9 and the envisaged social risks associated with recruitment qualified teachers in DLI5 and DLI6.
14. The ESSA process includes stakeholder consultations and disclosure of the ESSA Report, in accordance with the World Bank Policy and Directive for Program for-Results Financing and Access to Information Policy. At present, the ESSA consultation process is embedded in the Program consultation process.
15. Some analysis was carried out to determine the range of environmental and social risks and benefits that are associated with the PforR program based on each of the DLIs.
16. The PforR program will deliver minimal direct environmental benefits. Environment benefits will accrue through the use of school-based management grants for cleaning and maintaining school premises as outlined in DLI8.
17. The HOPE-Edu PforR has some activities that are expected to impact the environment. The procurement of civil works, construction, rehabilitation, classroom expansion, and the establishment of classrooms by communities in DLI5 could significantly impact the environment. The procurement of civil works, construction, rehabilitation and classroom expansion is associated with significant direct and indirect environmental risks such as solid waste generation, noise, land degradation, air pollution and destruction of flora and fauna, which could lead to biodiversity loss.
18. The delivery of a foundational learning package and essential teaching-learning materials (TLMs) associated with DLI1 will involve printing textbooks, especially to facilitate literacy and numeracy. This will consume a large amount of paper, thus impacting forests and trees used to manufacture paper. The digitization of the learning packages could reduce this.
19. In addition, the deployment of learning packages to teachers in the form of digital devices, the deployment of digital devices for recording observations by trained observers, the digitization of school-based data collection and transmission, procurement of digital devices, and adoption of a standardized and automated reporting format associated with DLIs 1, 3, and 9 could result in the generation of e-waste.
20. Furthermore, the HOPE-Edu PforR has many social benefits that will result from achieving the DLIs. These benefits include increased school enrollment, enhanced literacy and numeracy among school children, reduced out-of-school children (OOSC), enhanced performance of pupils and students in basic education, enhanced economic development, and poverty reduction, especially among the most vulnerable.

21. Availability of essential teaching-learning materials (DLI1), and activities associated with enabling teachers to effectively teach foundational literacy and numeracy (DLI2), and ensuring fidelity of the structured pedagogy program (DLI3) will result in significant social benefits. Activities which include the delivery of TLM, including accessible textbooks in literacy and numeracy and building of Grades 1-3 teacher capacity to effectively use the teaching-learning materials and apply the structured pedagogical approach for literacy and numeracy reach, including observation, feedback, and support to teachers as well as regular assessment of learning, enhancing literacy and numeracy programs in non-formal learning centres (NFLCs) and increased completion rate of pupils in these NFLCs and their advancement into formal education will result in increased enrollment in basic education, reduction in OOSC, improved literacy and numeracy, enhanced performance of pupils and students in basic education as will be manifested in their end of year results and other performance assessment measures.
22. Also, activities associated with increased access to primary education (DLI5) which include the construction of public primary classrooms and recruitment of qualified teachers for primary schools by communities and the establishment or strengthening of Non-formal learning centers (NFLCs) in DLI6 to enable OOSC to complete a literacy and numeracy program will enhance access to education by people without access to education, guarantee that qualified and competent teachers are available in primary schools in rural communities and at the NFLCs thus increasing enrollment of pupils in schools, reduction in OOSC, and improved literacy and numeracy of pupils in primary education and NFLCs.
23. The HOPE-Edu PforR is also associated with some social risks. The procurement of civil works, classroom construction, and expansion by communities in DLI5 and the establishment or strengthening of Non-formal learning centers (NFLCs) in DLI6 to enable OOSC to complete a literacy and numeracy program could potentially impact workers' health and safety for workers involved in rehabilitation works related to these DLIs. The workers may be exposed to pollution caused by dust and noise at the work site. There could also be an influx of workers to the communities where rehabilitation work will occur and child labor issues. This may affect the communities as there could be cases of sexual abuse and other vices, for example, drug abuse. Where the schools are not accessible for children and staff with disabilities, it may further create more exclusion. It is critical that the construction activities adhere to the National Accessibility Regulation<sup>1</sup> that provides the standards to ensure public infrastructures are accessible for all, including Persons with Disabilities.
24. There could be potential exclusion of children with disabilities where they are not targeted approaches to include them into the program as beneficiaries or make the schools inclusive. Other vulnerable groups that may be potentially excluded include children in conflict zones, nomadic households IDPs, exclusions due to ethnic considerations, etc. Child labour may occur, as most OOSC are already engaged in various forms of labour. There could be potential issues of child abuse, SEA/SH on children and sexual abuse or harassment of women in the recruitment and hiring of qualified teachers and instructors at Non Formal Learning Centres (NFLC) associated with DLI5 and 6. In addition, although social conflict as envisaged by ESSA, especially regarding

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<sup>1</sup> [ncpwd.gov.ng/pdfs/44document.pdf](http://ncpwd.gov.ng/pdfs/44document.pdf)

armed conflict, is not applicable, exclusion of vulnerable groups and discrimination along the lines of ethnicity and religion in the recruitment and hiring of teachers can result in complaints, social unrest and demonstrations.

25. Following the identification of environmental and social risks, the E&S management system in place to manage the identified risks was assessed. The assessment was done using the following criteria: strengths of the system, or where it functions effectively and efficiently and is consistent with Bank Policy and Directive for Program-for-Results Financing; inconsistencies and gaps between the principles espoused in Bank Policy and Directive for Program-for-Results Financing and capacity constraints; actions to strengthen the existing system. Information from this analysis, identification of gaps and opportunities/actions, was used to inform the recommendations and Program Action Plan (PAP).
26. Given the environmental impact of this project, some recommendations are made as follows:
  - a) Strengthening the E&S capacity under the project is needed. To facilitate this, E&S specialists should be recruited for the Program.
  - b) E-waste management strategies must also be developed specifically for the program to facilitate their management. The requirements for e-waste management and EPRON should be included in the bidding document under HOPE-Edu PforR.
  - c) Also, E&S management procedures and requirements should be included in the documents for the procurement of civil works, materials and school expansion.
  - d) There is a need to develop an environmental management strategy or manual and OHS guidelines for schools.
27. Given the identified social issues and weaknesses in the federal system, the following recommendations are made:
  - a) Ensure that the recruitment of teachers to reduce staffing gap and application of mechanisms to reduce absenteeism are carried out transparently to avoid ethnic or religious bias. Also, there is a need to ensure gender inclusion in the recruitment, deployment and management of teachers.
  - b) Ensure a select number of teachers are trained on environmental management and safety in the school environment.
  - c) Establish a robust grievance redress mechanism specific to the Program to ensure that complaints from different stakeholders are well addressed.
  - d) Strengthen provisions regarding gender-based violence (GBV) prevention and response, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment. This will include reviewing and, where appropriate, updating the Code of Conduct for teaching and non-teaching staff in the education sector.
  - e) Develop and implement guidelines to make school accessible for vulnerable children, including those with disabilities, nomadic, IDPs, and ethnic considerations.
  - f) Implement a whole-school approach to make schools safer for learning.
  - g) Develop a land donation protocol for donating community land to be used for the construction and classroom expansion.

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

**Table 6.1: Program Action Plan (PAP)**

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
1	Dedicate officials responsible for ensuring E&S PAP implementation	Prior to Effectiveness	UBEC, National Program Steering Committee (NPSC), National Program Coordinator (NPC), National Deputy Program Coordinator (NDPC)	Inclusion of the listed specialist in the team and maintained throughout the Program implementation, and Training Module and Implementation Support Supervision Report of World Bank Task team
2	Hire qualified Environmental and Social Officers and provide capacity building/system-strengthening program to strengthen their skills	No later than 3 months after effectiveness (will be reported during the first mission ISR)	SUBEC, State Program Steering Committee (SPSC), State Program Coordinator (SPC), State Deputy Program Coordinator (SDPC)	Assist the E&S PAP implementation official to execute the above responsibilities.
3	Develop e-waste management strategies for managing e-waste result from the program	Within one year of effectiveness or before the first bidding document for equipment procurement, whichever is earlier.	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	E-waste and healthcare waste management strategy document.
4	Strengthen provisions on gender-based violence (GBV) prevention and response in the school management guidelines, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment. This will include reviewing and,	Within two years of effectiveness	SUBEC, State Program Steering Committee (SPSC), State Program Coordinator (SPC), State Deputy Program Coordinator (SDPC), Ministry of Education, Teachers Training, Civil Service Commission and Teaching Service Commission, the Teachers Registration Council of Nigeria (TRCN).	School management guidelines to include provisions on GBV prevention and response  Code on Conduct is reviewed and updated for GBV prevention where necessary

<b>s/n</b>	<b>Action Description</b>	<b>Due Date</b>	<b>Responsible Party</b>	<b>Completion Measurement</b>
	where appropriate, updating the Code of Conduct for education officers, teaching and non-teaching staff in the education sector.			
5	Develop a GRM specific to the Program	Within one year of effectiveness	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	Copies of GRM outlining details of implementation
6	Develop guidelines and implement them to make school accessible for vulnerable children, including those with disabilities, nomadic, IDPs, and ethnic considerations.	Within two years of effectiveness	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	Guidelines developed and under implementation
7	Implement a whole-school approach to make schools safer for learning.	Within two years of effectiveness	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	Whole school approach guidelines developed and under implementation
8	Develop a community land donation protocol specifically for the Program.	Prior to Effectiveness	SUBEC, SPSC, SPC, and SDPC	Copies of land donation protocol outlining details of implementation

## SECTION I: PROGRAM DESCRIPTION AND SCOPE

### 1.1 Introduction

1. Nigeria's human development outcomes are among the lowest in the world. Nigeria's human capital index (HCI), according to the World Bank's Human Capital Index (HCI), of is 0.36, positioning it substantially below the average for Sub-Saharan Africa (0.40) and lower-middle-income countries worldwide (0.48). Nigeria's HCI of 0.36 implies that a child born in Nigeria can be expected to achieve only 36 percent of her or his potential productivity if current levels education services remain unchanged.<sup>2</sup> In education, a child who starts school at age four can expect to complete 10.2 years of school by her 18<sup>th</sup> birthday; but if one factors in what is actually learned, the expected years of school are only five.
2. In addition, Nigeria has the world's largest population of out-of-school children (OOSC). Children who attend non-formal education only or do not attend any form of education are both categorized as being out-of-school. Of the estimated 60.3 million children aged 5-14 years, there are an estimated 14.8 million OOSC (or 25 percent). In the primary school age range, of every four OOSC, one is a drop-out, one attends a non-formal Islamic school, and the remaining two have never attended any school at all.<sup>3</sup> Non-formal education through Qur'anic schools is widespread in the Northern zones. The majority of Children with disabilities are OOSC in Nigeria. Studies have revealed that up to 3.5 million children with disabilities are currently out-of-school, while a study done by JONAPWD indicated that 95 per cent of children with disabilities are out of school. They are often neglected, and there are no deliberate approaches to integrate them into development programs. NLSS 2018-2019 finds that 44 per cent of girls with disabilities of primary school age were out of school.<sup>4</sup>
3. Also, an estimated 45.8 million children aged 5-14 years are unable to read and understand a simple text. This corresponds to an overall learning deprivation rate of 76 per cent, and is higher for boys (78) than for girls (74). The rate ranges from 47-64 per cent in the Southern zones to 82-93 per cent in the Northern zones; from 15 per cent in Lagos to 99 per cent in Jigawa. The primary school completion rate is 73.1 percent, and the junior secondary completion rate is 67.7 percent.<sup>5</sup> Among students attending Grade 3, 22.5 percent and 21.5 percent demonstrate foundational (Grade Two level) reading and numeracy skills, respectively; the rates among students attending Grade 6 are 39.2 and 35.4 percent, respectively; and among students attending the final year of JSS are 71.1 and 60.2 percent, respectively. Only 3.5 percent of children aged 7-14 years who are not in school demonstrate foundational reading skills and 3.9 percent demonstrate foundational numeracy skills. Overall, only about 1 in 4 children aged 7-14 years demonstrate foundational literacy, and even among children who attend school in these age-corresponding grades, only 4 in 10 demonstrate foundational literacy.<sup>6</sup> While the country

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<sup>2</sup> World Bank, 2022. Human Capital Index database. <https://www.worldbank.org/en/publication/human-capital#Briefs>

<sup>3</sup> National Education Data Survey (NEDS) 2020. The net attendance rates for formal education reported here are somewhat higher than those reported in MICS 2021.

<sup>4</sup> Nigeria National Bureau of Statistics. Living Standards Survey (NLSS) 2018/19.

<sup>5</sup> MICS, 2021. The National Personnel Audit (NPA) 2002 estimates that the primary completion rate is 82.9 percent, and the junior secondary completion rate is 45.1 percent (p. 19).

<sup>6</sup> The same Grade Two level questions were administered regardless of age, indicating that learning increases with the number of grades attended. Children 'not in school' includes those in non-formal education.

does not yet have official learning poverty figures, estimates using available data suggests that more than 75 percent of Nigerian children are unable to read and understand a simple text by age 10. The share is slightly higher for males when compared to females.

4. The quality of teaching is also poor. In public primary and JSS schools, the subject in which textbooks are the most available is mathematics, yet in all grades there is on average only one textbook for every five students.<sup>7</sup> Visual teaching aids needed to support language learning are commonly unavailable.<sup>8</sup> Besides, there is shortage of qualified teachers. The national average pupil-teacher ratio (PTR) for primary education is 49:1; and for JSS is 29:1. If one takes into account teacher qualifications at the primary level it is 98 (without one state having a ratio below 44:1); and at JSS, it is 75:1.
5. The national EMIS team has a minimal budget and can only issue guidance to states, who must finance data collection from limited resources. Several aid programmes have managed to provide assistance to improve the analysis of annual school census and out-of-school survey data, establishing a more reliable picture of where education investment should be prioritized.<sup>i</sup> In addition to the lack of adequate data for planning, several indicators have been identified as impediments to the education of learners with disabilities in Nigeria. These include lack of facilities and learning aids, including assistive technologies, due to their high cost; inadequate and unskilled human resources; an absence of legislation that guarantees inclusive education; inadequate funding to meet the learning and teaching needs for children with disabilities; inadequate implementation of existing education policies; discriminatory attitudes; and a dearth of early identification and intervention programs<sup>ii</sup>.

## 1.2 Program Description

6. To deal with these problems and more under basic education in Nigeria, the World Bank is proposing to support the Government of Nigeria (GoN) with a Program for Results (PforR) instrument referred to as Nigeria Human Capital Opportunities for Prosperity and Equality Program-For-Results (HOPE)- Quality Basic Education for All Program-For-Results (HOPE-Edu PforR) (hereafter, the Program). The proposed operation is a hybrid that will include a part allocated to technical assistance (TA), which uses an Investment Project Financing (IPF) instrument. The IDA and the GPE contributions to the HOPE-EDU PforR PEF will be US\$475.0 million and US\$44.8 million respectively. Together, the IDA/GPE financing of US\$519.8 million for the PforR component is about 16.5 percent of the total program financing requirements estimated at US\$3,141.15 million. When the IPF component financing of US\$32.4 million – IDA US\$25.0 million and GPE US\$7.4 million - is included, the IDA/GPE contribution totals US\$552.18 million, accounting for 17.4 percent of total financing requirement of US\$3,173.54 million for the operation.
7. The Program is expected to directly benefit 29 million children enrolled at public primary schools; 500,000 public primary teachers; and more than 65,000 public primary schools as well as their school-based management committees (SBMCs) who will cater to their students and teachers.

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<sup>7</sup> NPA 2022, pp. 273-278.

<sup>8</sup> See e.g. American Institutes for Research, 2024. Early-grade literacy instruction in Edo. A review of the lesson plans and its implementation. Draft Report, p. 20.

Program beneficiaries will also include another 1.5 million children who will enroll in accelerated non-formal basic education program in 10,000 non-formal learning centers. In addition, the program will benefit government agencies at the federal, the state and the local governments through enhanced capacities to plan, implement and monitor basic education service delivery.

8. The Program Development Objectives are to improve foundational learning outcomes, increase access to basic education and to enhance education systems in participating States. The following PDO level indicators will measure the achievement of the result:
  - a) Percentage of children in Grade 3 who are proficient in reading, disaggregated by sex
  - b) Percentage of children in Grade 3 who are proficient in mathematics, disaggregated by sex
  - c) Number of out-of-school children aged 5-14 years who have been brought into a formal or non-formal literacy and numeracy program
  - d) Number of states that digitally publish complete Annual School Census Database and Report on time
  
9. The operation will be structured around three results areas: improving quality; increasing access; and enhancing key systems. There are 10 DLIs. The summary Table of DLIs across the three result areas are presented in Table 1.1. The detail of DLIs and DLRs is presented in Annex 1.

**Table 1.1: Summary Table of DLIs across three results-areas**

Purpose of DLI	DLI	Financing allocated (US\$, Millions)
<b>Results Area One: Improving Quality</b>		<b>295.84</b>
Make essential and high-quality teaching-learning materials (TLMs) available to Grades 1-3 public teachers and students that are needed to master foundational literacy and numeracy	1: Number of schools with Grades 1-3 TLMs	
Provide Grades 1-3 public teachers with the competencies to effectively use structured pedagogical materials to teach foundational literacy and numeracy	2: Number of Grades 1-3 teachers able to use structured pedagogy materials	
Ensure Structured Pedagogy Program (SPP) delivered with fidelity by monitoring and supporting teacher practice	3: Number of Grades 1-3 teachers mentored on SPP	
Promote SPP effectiveness by evaluating early learning sub-skills and using results to strengthen SPP design and teacher support	4: Number of LGEAs evaluating early learning results	
<b>Results Area Two: Increasing Access</b>		<b>134.0</b>
Increase access to public primary education in areas where there are no schools or schools are overcrowded	5: Number of new primary classrooms created through community participation	



<b>Purpose of DLI</b>	<b>DLI</b>	<b>Financing allocated (US\$, Millions)</b>
Increase literacy and numeracy among OOSC for whom formal primary education is not an option	6: Number of children who complete NFBE program	
<b>Results Area Three: Enhancing Key Systems</b>		<b>89.955</b>
Strengthen UBE Intervention Fund Formula (IFF) and decentralize the management of UBE funds	7: Percentage of core UBE funds managed at decentralized level	
Strengthen school management, governance and financial autonomy	8: Percentage of public primary schools managing annual school grant	
Make information for education system management available on a timely basis	9: Percentage of schools included in current-year Annual School Census report	
Generate information on system effectiveness to strengthen strategy, policy and investments	10: Number of National Learning Assessments completed	
<b>Total:</b>		<b>519.795</b>

### **1.3 Program Implementation and Institutional Arrangements**

10. The Program will use the government systems and implementation structure for implementation, fiduciary, safeguards, M&E, and reporting arrangements. The program will use and strengthen existing implementation arrangements deployed by government for basic education in which the Federal Ministry of Education (FME) is mandated to formulate and coordinate policy while UBEC (federal) and SUBEB (state level) are responsible for UBE program implementation. At the National level, a joint Inter-Ministerial National Steering Committee (NSC) will be established covering all three HOPE operations. This committee will be co-Chaired by the Minister of Education, Coordinating Minister of Health and Social Welfare and Minister of Budget and Economic Planning. They will be responsible for providing high-level guidance, advice, and strategic oversight on the HOPE interdependent series of operations.

11. At FME, a National Program Steering Committee (NPSC) will be established to provide oversight of the HOPE-EDU Program. The NPSC will be comprised of heads of the parastatals including the UBEC; Commissioners for Education and SUBEB Chairpersons from the participating states; and a representative from the FMF. The NPSC Chair may at his discretion invite other key stakeholders including Development Partners (DPs) to attend NSPC meetings. The NPSC will review implementation progress and agree on future work priorities; review and approve strategic approaches to achieving DLI results and operational objectives; and facilitate effective coordination across agencies, states, development partners and other stakeholders. The NPSC will meet, at least once per year.

12. The Government will appoint a National Program Coordinator (NPC) preferably at the level of Permanent Secretary at FME and a National Deputy Program Coordinator (NDPC) preferably at

Executive Secretary or Deputy ES rank at UBEC. Both will report to the Minister of Education. NPC at FME will oversee the program across the relevant departments/agencies; and provide regular oversight of RA3 implementation (pertaining to DLIs 9/10) through the Director of the Educational Planning, Research and Development (DPR&D) department. The NDPC at UBEC will be responsible for the regular, overall coordination of program implementation pertaining to RAs 1 (DLIs 1-4), 2 (DLIs 5-6) and 3 (DLI 7-8). Directors of relevant departments at UBEC will be responsible for overseeing the delivery of respective RA activities at the state level and will report directly to the NDPC. The NPC and NDPC will work closely together and hold quarterly meetings with the relevant directors of departments across FME and UBEC. The daily coordination and supervision of activities related to DLIs 1-8 and to the IPF component will be managed by a full-time Technical Support Team (TST) Manager who will report to, and act on the delegated authority of, the NDPC; and who will be appointed by the government. The TST Manager will be in charge of a Technical Support Team (TST) that will be established at UBEC to coordinate among, and provide technical assistance and operational support to, the SUBEBs/SMEs, in order to achieve RA results and implement IPF-related activities. The TST will be comprised of specialized technical consultants and officers, who will be placed in the relevant UBEC departments to provide implementation support and build capacities. With respect to activities related to achieve DLI 7 results, the TST Manager will directly support the NDPC in the area of revising the UBEIF formula and guidelines; while support to the states to decentralize the management of UBE core funds will be provided by the relevant UBEC departments, under the supervision of the TST Manager.

13. At the state level, each State will establish a State Program Steering Committee (SPSC) to provide program oversight. The committee will be chaired by the Executive Governor of the state and will be comprised of the Commissioner for Education, the SUBEB Chairperson and all heads of relevant department and agencies. The SPSC Chair may at his discretion invite other key stakeholders including DPs to attend SPSC meetings. The SPSC will approve annual work plans and the strategic approaches adopted; ensure that applicable annual eligibility criteria are met, including the establishment of adequately resourced budget lines for the activities need to achieve DLI results; and facilitate effective coordination across agencies, states, development partners and other stakeholders. The SPSC will meet at least twice per year. The SUBEB Chairperson will be responsible for the daily coordination and supervision of activities related to DLIs 1-8. Heads of relevant departments at SUBEB will have responsibility for ensuring the delivery of DLI-related activities. A state-level TST will also be established, comprised of at least one technical consultant/officer per Results Area in which the state is participating. Each state-level TST member will support and work in close collaboration with the relevant SUBEB/SME departments and agencies and will report to the SUBEB Chairperson as well as their counterpart TST specialist at the national level. The state-level TST members will be hired by the national TST and financed under the IPF component, while the SUBEB and state government will take responsibility for their working conditions and non-salary operating costs. With respect to DLI 9 (ASC), the SME Commissioner will be responsible for the coordination and oversight of activities, with daily supervision and implementation management being the delegated responsibility of the head of the SME department responsible for education management information systems.

14. The NDPC at the federal level will manage the IPF component through the TST Manager, sharing the TA across states where relevant, thus increasing efficiency of resources and promoting common standards and approaches. The federal TST will provide and manage technical assistance support to the states to achieve the DLIs, coordinate common TA activities across states, promote adoption of similar standards and organize inter-state fora that meet periodically to exchange experiences and review progress. The federal TST will coordinate with Development Partners to ensure TA harmonization and complementarities across states and interventions. M&E, fiduciary and safeguards functions will be managed by the relevant departments within FME/ UBEC at the Federal level and SME/SUBEB at the state level. The composition and working procedures of the TST will be fully described in the Operations Manual.
15. The program Results Areas will be implemented at multiple levels. The lead agency nationally responsible for funding and implementation of RAs 1-3 (covering DLIs 1 through 8) will be UBEC, working in close collaboration with the SUBEBs, which will take the lead role for implementation at the level of participating States. The SUBEBs will collaborate closely with SMEs in each RAs as needed, as well as with the LGEAs; the LGEAs will in turn assist implementation working in cooperation with SBMCs and School Principals. SMEs will have lead responsibility on the State Annual School Census database and report, working in close collaboration with SUBEBs, LGEAs and the FME, which will have lead responsibility for the national ASC database and report. FME will have lead responsibility for the national learning assessment, working closely with SMEs as needed. The preparation of the annual state education budget and state UBE plan (an annual eligibility criterion) will be jointly led by the SME/SUBEB, with support and guidance from UBEC.
16. UBEC and FME will meet regularly with their counterparts of the HOPE-GOV operation to review complementarity and synergies between the two operations, and to monitor states' performance on HOPE-GOV annual eligibility criteria. HOPE-EDU DLIs on EMIS will feed into HOPE-GOV DLIs pertaining to state citizen reports, while HOPE-GOV DLIs on teacher recruitment and deployment will be used to inform implementation of HOPE-EDU DLIs on quality and access. HOPE-EDU and HOPE-GOV will also harmonize their operations manuals and verification protocols where they share the same implementing agency at federal or state level. Finally, implementation missions of the two operations will be coordinated to ensure alignment, efficiency and impact. Implementation arrangements will be further refined during program appraisal

#### **1.4 Program Boundaries and Result areas**

17. The government's Universal Basic Education (UBE) Program will provide the program boundary. The proposed PforR would be mapped to pillars of UBEC's 10-Year Roadmap. Five of the Roadmap's seven pillars are supported by the operation; while the other two are supported under another operation in this series, HOPE-Governance (P181476). The HOPE-EDU Program works in three results areas (RAs). RA1 supports improving the quality of education through the introduction of structured pedagogy focused on foundational literacy and numeracy. This is aligned to Pillar 3 (Quality and Learning Outcomes), particularly the strategies to introduce best pedagogical practices supporting learner literacy and numeracy, including the provision of teacher guides and textbooks; as well the Roadmap's strategy to provide regular teacher professional development. RA2 supports increasing equitable access through the creation of

new public primary classrooms and making non-formal basic education programs available to out-of-school children. This is aligned to Pillar 1 (Access and Equity), particularly the strategies to provide quality learning environments including WASH facilities and to make basic education programs more widely accessible through Almajiri schools and other non-formal learning centres. RA3 supports enhancing key systems for decentralized funding, school management and governance, and management information. This is aligned to Pillar 5 (System Strengthening), particularly the strategies to make school-based management committees (SBMCs) functional and scale up community involvement, and to build capacities in education management information; as well as the strategy to identify learning gaps through learning assessments. Pillars 2 (Crisis and Emergency Response) and 7 (Sector Coordination, Partnership and Collaboration) will be incorporated on a cross-cutting basis into all RAs. The specific boundaries of the operation will also be defined by the geographical participation of states in this operation. The program boundary is summarized in Table 1.2.

**Table 1.2: HOPE-Education Program Boundary**

	Government's UBE Program	HOPE-Education PforR Program	Extent of alignment
Objective	Accelerated, sustained, inclusive & equitable provision of quality basic education for all children	To improve foundational learning outcomes, increase access to basic education and enhance key education systems in participating states	Aligned
Duration	2021-2030	2025-2028	Aligned, HOPE-Education is a time-slice
Geographic coverage	National	Open to states that express interest and meet eligibility criteria	Aligned
Results areas	Pillar 1: Access and equity 2: Crisis & emergency response 3: Quality & learning outcomes 4: Teacher quality & management 5: System strengthening 6: Education financing and resourcing 7: Sector coordination, partnership & coordination	RA1: Improving quality RA2: Increasing access RA3: Enhancing key systems	RA1 aligned to Pillar 3, with focus on strategies to introduce best practices promoting foundational learning. RA2 aligned to Pillar 1, with focus on strategies to provide equitable and accessible learning environments in formal and non-formal settings. RA3 aligned to Pillars 5 and 6, with focus on strategies to strengthen decentralized funding, school autonomy, community involvement, strengthen EMIS and learning assessment capacities. Pillars 2, 7 incorporated on cross-cutting basis. Parts of Pillars 4, 6, 7 under HOPE-GOV
Overall Financing	US\$9,518.6 million for 2025-2028	Total: US\$3141.1 million Borrower: \$2,621.4m IDA: \$475m (+ \$25m for IPF) GPE: \$44.8m (+ \$7.4m for IPF)	HOPE-Education PforR financing accounts for approximately 33% of the total UBE program financing. Remainder, largely teacher salaries, is under HOPE-GOV PforR.

**Results Area 1: Improving Quality** (US\$295.84 million). This area aims to ensure that foundational literacy and numeracy are taught to students in Primary Grades 1-3 (P1, P2, P3) using a Structured Pedagogy Program (SPP) in participating States. The SPP is a coherent package of four integrated

elements, which together are designed to improve classroom instruction and subsequently student performance: (i) teaching-learning materials (TLMs); (ii) teacher capacities; (iii) teacher support; and (iv) action-oriented evaluation of learning.

18. Using structured pedagogical materials that have been evaluated for effectiveness in a public school system, the participating States will develop, adapt or revise student textbooks and teacher's guides for literacy and numeracy for each of Primary Grades 1-3, in the applicable national language of instruction. The materials will follow detailed language- and numeracy-specific scope and sequences, with clear skills progressions that progressively build toward higher order skills e.g. beginning students learn the foundations of alphabet knowledge, and decoding skills, on the road toward increasingly automatic reading of words, adequate oral reading fluency, and eventually full reading comprehension. Accessible format of textbooks for children with disabilities will be included to support children with disabilities. The teacher's guides will provide structured lesson plans, as well as guidance on maximizing instructional time, evidence-based learning activities, appropriate sequencing and pacing, checks for learning, engaging students, and the use of low-cost materials to develop visual teaching aids. The TLMs will be quality assured and audited for inclusion by the National Educational Research and Development Council (NERDC), which will also develop and approve physical technical specifications for the TLMs. The textbooks will be supplied to schools on a 1:1 student to book ratio; participating states may also include workbooks to complement the textbooks. To strengthen the textbook supply chain and enhance textbooks management and usage, the federal and participating state governments will operationalize a system to track and trace (TnT) the TLMs from the publisher/printer to the school; and after three years will evaluate textbooks usage, physical state and inventory, in order to develop textbooks management guidelines and improved physical specifications.

19. **Teachers will be provided with professional development in support of the SPP.** Teachers delivering the SPP will be trained on how to effectively use the lesson plans and instructional guidance in the teacher's guide. To ensure the SPP is implemented in the classroom as per design and to strengthen teaching-learning practices, teachers will also be periodically observed and mentored. The federal and state governments will build on existing SPP models to develop valid observation instruments that provide simple, meaningful measures that factor the needs of both special educators and teachers with disabilities and aligned with the TLMs. The mentors will be trained on the correct use of the instrument and good coaching practices, for which purpose they will also be provided with pedagogical support resources. Participating States will ensure that observers are experienced pedagogues, and that their observation and mentoring work is sustainably supported. In this latter regard, and depending on local resource availability, the mentor may be for example an LGEA Teacher Support Officer (TSO) or the School Principal.

20. **To monitor the effectiveness of the SPP, LGEAs will conduct annual sample-based evaluations of learning in literacy and numeracy for Grades 1 and 2.** These rapid evaluation tools will be aligned with critical sub-skills in both reading and mathematics that form the early building blocks in both subjects. To ensure sustainability, and depending on the particular institutional, resource and capacity circumstances of each participating state, the evaluations may be administered by the coaches, an office of the LGEA or other suitable agent. The evaluation results will be analyzed each year by the mentors and education authorities at the level of each

LGEA, and used to drive adjustments in the SPP design and delivery for better impact, including through advice given to teachers.

**Results Area 2: Increasing Access** (US\$134 million). This area aims to increase access to, and enrollment in, primary education in participating States through the community-supported creation of new classrooms and learning opportunities in the public formal and non-formal sectors.

21. **Government-community partnership agreements will be developed and implemented to create twelve thousand new public primary classrooms in areas where there are no schools within safe walking distance, or where accessible schools have a SCR exceeding 50 and adding an extra shift is not a solution.** The partnership agreements between the School-Based Management Committee (SBMC) and the LGEA/SUBEB/SME will detail each party's contributions, including the appointment of a qualified teacher and provision of assistive devices based on needs assessments of the children with disabilities. The agreements will adhere to certain process and end-result standards. The process standards will include the SBMC ensuring a minimum community contribution to, and community monitoring of, the construction project; as well as the transparent processing of procurements, with information made publicly available. With respect to end results, the construction works must adhere to applicable infrastructural and social-environmental standards pertaining *inter alia* to design, materials and climate resilience; and must include (if absent) a secure perimeter, physical disability access, and adequate gender-segregated accessible WASH facilities. The construction will adhere to the National Accessibility Regulation that provides the standards to ensure public infrastructures are accessible for all, including Persons with Disabilities.
22. **Non-formal learning centers (NFLCs) will be established or strengthened to enable OOSC to complete a literacy and numeracy program.** The NFLC may be a traditional Islamic school or a community non-formal learning center. It will have a Centre-Based Management Committee (CBMC) that has been trained on the essential duties of NFLC management, including instructor selection, enabling access, child protection, and security awareness and response. The CBMC will also be responsible for community mobilization to identify and attract OOSC. The mobilization process will filter out-of-school children to enroll only those for whom NFBE is appropriate, encouraging enrollment in the formal primary system of those who are able to integrate directly into, and have access to, a public school. In areas where there is an accessible formal primary school that is overcrowded, or where there is no formal primary school, the community will be encouraged to create new primary classrooms using the partnership agreements explained above. The program will be delivered in the relevant national language of instruction, using TLMs that have been formally approved; and may be any of the non-formal basic education programs that provide equivalency to the formal curriculum, such that a child who successfully completes a program and passes the formal evaluation may transition into the formal system. The program will be taught by a qualified and paid instructor.

**Results Area 3: Enhancing Key Systems** (US\$89.955 million). This area aims to strengthen the allocation and management of UBEIF, school management, governance and accountability; and to generate information essential to system management and performance monitoring.

23. **The operation will support strengthening the UBE IF formula (IFF) and decentralizing the management of UBE funds.** The IFF will be revised to allocate funds across states based on needs and performance; and to give states the flexibility to use their allocation in line with state-defined priorities and performance. The IF Guidelines (IFG) will also be revised to allow for greater decentralization in the management of UBE funds, and to strengthen gender-based planning and how funds are used to address climate change and support vulnerable groups. The states will operationalize and strengthen systems to enable this, particularly pertaining to core funds for: i) SUBEBs, to manage TLMs procurement and distribution; ii) LGEAs and community-based organizations, to manage teacher continuous professional development (CPD), the monitoring and quality assurance of education services, and community-based civil works (CBCW).
24. **The federal and participating state governments will sustainably finance an annual operating grant for public primary schools in participating States; to be managed by the school in accordance with strengthened grant and school management guidelines.** The amount of the grant will be established and inscribed in the state annual education budget, in line with available state and federal resources; automatically disbursed each year in regular tranches; and allocated equitably across schools within any given state according to a transparent formula. The strengthened guidelines will cover *inter alia* the process for developing the grant budget and expending the funds, including fiduciary obligations and requirements pertaining to community participation and monitoring; and a positive list of eligible (including mandatory) expenditures, including resources to monitor and encourage attendance, particularly of children who have dropped out or are at-risk of dropping out; for TLMs; and cleaning, maintenance and small repairs. The guidelines will also strengthen the school's governance and accountability functions, with greater reporting to the community on school activities, and on teacher and student performance; an enhanced attention to child safety and protection, security awareness and response, climate change and resilience, and support to vulnerable groups; and more parental involvement in the school community including to establish developmental priorities and monitor school performance.
25. **The education management information system will be strengthened in all states and the FCT, to ensure that the annual school census (ASC) database and statistical report are digitally published using current-year data from at least 95 per cent of schools.** The digital annual school census (ASC) form maintained by NEMIS will be adopted in all states/FCT, which will follow one standard schedule and set of procedures for data collection, transmission and reporting. To this end, the federal and state/FCT governments will cooperate to ensure that the ASC data template and platform are fully accessible, and capacities are in place to operate the system at all levels; states will ensure that SMEs and LGEAs have adequate IT infrastructure for data collection, processing and validation. Digital platforms will be upgraded as needed to enable the publication and downloading of disaggregated ASC results down to the school level. Further, data requirements and school codes will be aligned across the ASC and National Personnel Audit (NPA) platforms, to ensure their interoperability. Two national assessments of learning in basic education will be conducted covering at least one grade in each of lower primary, upper primary and JSS. The assessments will be representative at the state level; benchmark learning against clearly articulated proficiency levels; include strata of children who have completed a NFBE program; and allow computation of learning poverty both at the state level and nationally. The

results will be discussed by high-level decision makers to review and strengthen education sector strategies and policies.

### 1.5 Excluded Activities

26. The Program will exclude activities that do not meet the World Bank's Policy on eligibility for PforR financing (September 2020). The borrower shall ensure that the Program excludes any activity that, in the opinion of the World Bank, is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented and/or requires significant land acquisition, displacement, and/or resettlement of affected people.
27. Any Program activity that entails land acquisition, negative impact on natural habitat and cultural resources, public and worker's health and safety will not be funded under the PforR without adequate environmental and social management. For example, the program will support the procurement of civil works, and materials only when an adequate e-waste management plan is in place of the bidding document and monitored and reported regularly.

### 1.6 Scope of the Environmental and Social Management System Assessment (ESSA)

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



- d) **Land Acquisition:** To manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards.
- e) **Vulnerable Groups:** To give due consideration to the cultural appropriateness of and equitable access to Program benefits, giving special attention to the rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.
- f) **Social Conflict:** To avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial dispute.

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

- a) Increased generation of e-waste due to possible use of digital devices in monitoring the effectiveness of structured pedagogical program (SPP) materials in DLI 4 and, digitization of annual school census (ASC) and digital submission and publication of validated data in DLI9, which will involve the use of ICT systems.
- b) The procurement and delivery of civil works, equipment, and materials, including the construction of twelve thousand new public classrooms through government-community partnerships in DLIs 5 and the creation of new public primary classrooms through government-community partnerships in DLI 6 could lead to adverse environmental and social impacts associated with these activities, such as the generation of solid waste, noise, and air pollution.
- c) Potential exclusion of vulnerable groups, e.g. children with disabilities, those in conflict zones, nomadic households, internally displaced persons (IDPs), etc., where there are no targeted approaches to mainstream them into the educational system.
- d) Potential discrimination of vulnerable groups due to ethnic considerations, sexual abuse or harassment of children in the provision of teaching and learning materials (TLM) in DLI 1 and women in the recruitment of a qualified teacher and instructors in Non-Formal Learning Centres (NFLC) in DLI 6.
- e) Conflicts and security risks could disrupt the Program's implementation. Insurgents and bandits can target schools and teachers.
- f) Resistance by members of the community who may view the Program, especially for girls, as conflicting with cultural beliefs. On the contrary exclusion of stakeholders can also lead to mistrust and resistance of the Program.
- g) The procurement and delivery of civil works, equipment, and materials in DLI5 could also impact workers' health and safety.
- h) Construction of twelve thousand new classrooms in public primary under DLI5 could result in land acquisition for building more classrooms. This could result in social risks associated with land acquisition.
- i) Potential risk of child abuse and child labour during the construction of new public primary classrooms

31. The details of the applicability of Core Environmental and Social Principles (CP) to HOPE PforR Result Area and Disbursement Linked Indicators (DLIs) are presented in Annex 2. A summary of DLI applicability by Core Principle is presented in the table below.

**Table 1.3: Summary of DLIs Applicability by Core Principle**

DLI No	DLI	Applicability by Core Principle	
		Environment	Social
1	1: Number of schools with Grades 1-3 TLMs	CP1	CP5
2	2: Number of Grades 1-3 teachers able to use structured pedagogy materials		CP5
3	3: Number of Grades 1-3 teachers mentored on SPP		C5
4	4: Number of LGEAs evaluating early learning results	CP1	
5	5: Number of new primary classrooms created through community participation	CP1, CP2	CP3, CP4, CP5, C6
6	6: Number of children who complete NFBE program	CP1, CP2	CP3, CP4, CP5, C6
9	9: Percentage of schools included in current-year Annual School Census report	CP1	
10	10: Number of National Learning Assessments completed	CP1	

**1.7 Objectives of this ESSA**

32. The specific objectives of this ESSA are to:

- a) Identify the potential environmental and social impacts/risks applicable to the Program's interventions.
- b) Review all relevant Nigerian policy and the legal framework of the Government of Nigeria (GoN) and relevant State Governments related to the management of environmental and social impacts of the Program's interventions.
- c) Review the environmental and social due diligence management procedures and institutional responsibilities that the GoN is using for the HOPE-Education program.
- d) Assess capacity within domestic revenue generation institutions and Environmental and Social management within the public sector operating systems of the GoN put in place for environmental and social impact management within the Program system.
- e) Assess the Program's system performance concerning the core principles of the Program-for-Results (PforR) instrument, as well as identify gaps in the Program's performance.
- f) Recommended actions to fill gaps identified that will be embedded into the Program Action Plan (PAP) to strengthen the Program's performance with respect to the core principles on Environment and Social of the PforR instrument to ensure sustainable implementation via good due diligence

33. The overall environmental and social risks have been assessed and deemed to be **Substantial**. Although the program activities are not likely to require significant changes to the borrower's overall environmental systems, the program was generally assessed as substantial because of the procurement of civil works and material in DLIs 5 , possible community land acquisition for building of classrooms, e-waste as a result of possible deployment of learning packages to teachers in the form of digital devices in DLI 1, and, digitization of annual school census and database and publishing of statistical report digitally in DLI9 and the envisaged social risks associated with recruitment qualified teachers and instructors DLI6.

### **1.8 Approach of ESSA**

34. The World Bank team prepared the ESSA through a combination of detailed reviews of existing program materials and available technical literature, including policies, regulations, guidelines and examples of due diligence and design documents, interviews and extensive consultations with government staff, non-governmental organizations, regulatory agencies, private sector organizations and sector experts associated with public revenue generation. Based on the analysis conducted, the findings, conclusions and opinions expressed in the ESSA are those of the Bank.
35. An environmental and social risk screening of proposed activities was undertaken at the concept stage. The purpose of the screening was to:
- Confirm that there are no activities which meet the defined exclusion criteria included in the PforR in line with the Bank Guideline for the ESSA; and
  - Establish the initial scope of the ESSA. This includes identification of relevant systems under the PforR and relevant stakeholders for engagement and consultations.
36. System Assessment (September 2020). The guidance sets out core principles (See Section I.5) and planning elements used to ensure that PforR operations are designed and implemented in a manner that maximizes potential environmental and social benefits while avoiding, minimizing or mitigating environmental and social harm.
37. Following the initial screening, the system review was conducted using a two-step approach:
- Identification of relevant systems that are pertinent to the ESSA was addressed in Section IV which presents an overview of relevant government environmental and social management systems; and
  - Assessment of CLIENT'S environmental and social management systems for consistency with the applicable Core Principles, including capacity and enforcement of certain environmental and social measures, was addressed in Section V, while environmental and social recommendations were addressed in Section VI.

## SECTION II: STAKEHOLDER CONSULTATION

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

**Table 2.1: Summary of the stakeholder’s concerns and responses from the bank team**

Comments and Concerns of Stakeholders	Responses
There were concerns about the lack of explicit mention of key agencies such as the Universal Basic Education Commission (UBEC) and State Universal Basic Education Boards (SUBEB) in the program action plan, despite their important roles in education.	The was noted.
Despite their inclusion in vulnerable groups, the action plan did not specifically mention children with disabilities. The alignment with Nigeria's National Inclusive Education Policy raised questions	It was noted that vulnerable groups also include children with disabilities and others but none was explicitly mentioned in the PAP.
There were also concerns about the lack of involvement of relevant stakeholders, such as the National Commission for Persons with Disabilities (NCPWD) and organizations representing persons with disabilities (OPDs), as well as the omission of key legislative references, like the Disability Act and the UN Convention on the Rights of Persons with Disabilities	It was noted that all stakeholders were involved in the formulation of the Program by the World Bank Technical Team for Education. The team noted that the disability act will be included as part of institutional framework for vulnerable people.
For long-term sustainability, there was a strong emphasis on the program's full integration into Nigeria's educational ecosystem	The team indicated that it was already the case as the technical took account of the Nigeria educational ecosystem in Program design.
Engaging all stakeholders at federal, state, and local levels, such as national education boards, local authorities, state assemblies, and development partners, was a concern to ensure effective participation and prevent weak links in the program	It was observed that the technical team has made effort to engage all the stakeholders and that consultation with stakeholders is a continuous process.
Need for capacity building for new environmental and social safeguard (ESS) teams, particularly in emerging rural communities and areas with empty classrooms	This was noted and is already part of the PAP
Stakeholders in attendance recommended a holistic approach to program implementation, involving all levels of government and stakeholders and leveraging local partnerships to strengthen accountability and inclusion	Noted

## **SECTION III: DESCRIPTION OF EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL IMPACTS**

### **3.1 Overview of Program Risks and Benefits**

44. The PforR component of HOPE-Edu will generate some E&S benefits and risks. The environmental risks include e-waste, which could result from possible deployment of learning packages to teachers in the form of digital devices and digitization of annual school census and database and publishing of statistical report digitally. Also, construction and classroom expansion, would pose some environmental risks associated with construction. On the other hand, the environmental benefits are minimal and limited to the benefits of maintaining and cleaning school compounds. The detailed range of key environmental and social risks and benefits associated with specific DLI in HOPE-Edu PforR is presented in Annex 3.

### **3.2 Expected Environmental Benefits**

45. The PforR program will deliver minimal direct environmental benefits. Environment benefits will accrue through the use of school-based management grants for cleaning and maintaining school premises as outlined in DLI 8.

### **3.3 Expected Environmental Risks and Impacts**

46. The HOPE-Edu PforR has some activities that are expected to impact the environment. The construction, and classroom expansion associated with DLI 5 and DLI 6, could significantly impact the environment. The procurement of civil works, construction, and classroom expansion is associated with significant direct and indirect environmental risks such as solid waste generation, noise, land degradation, air pollution and destruction of flora and fauna, which could lead to biodiversity loss.

47. The supply of teaching-learning materials (TLMs) associated with DLI1 and printing and distribution of Non-Formal Basic Education (NFBE) TLMs will involve printing textbooks and teacher guides with structured lesson plans. This will consume a large amount of paper, thus impacting forests and trees used to manufacture paper. Digitizing the learning packages could reduce the impact.

48. In addition, the possibility of deploying learning packages to teachers in the form of digital devices, digitizing teacher observation instruments, possible use of digital means in the evaluation of learning in literacy and numeracy by Local Government Education Authorities (LGEAs) the digitization of annual school census and transmission, , and adoption of a standardized and automated reporting format associated with DLIs 1, 3, 4 and 9 could result in the generation of e-waste.

### **3.4 Expected Social Benefits**

49. The HOPE -Edu PforR has many social benefits that will result from achieving the DLIs. These benefits include increased school enrollment, enhanced literacy and numeracy among school children, reduced out-of-school children (OOSC), enhanced performance of pupils and students in basic education, enhanced economic development, and poverty

reduction, especially among the most vulnerable. The pathway for the social benefit of the intervention is shown in Figure 3.1 below



Figure 3.1: Pathway of social benefits of interventions under the Program.

50. Activities associated with ensuring the availability of essential teaching-learning materials (DLI1), enhancing teachers' competencies in teaching foundational literacy and numeracy through professional development support (DLI2) and mentoring of teachers on SPP (DLI3) will result in significant social benefits. Activities which include the supply of teaching-learning materials (TLMs) that are designed to foster mastery of foundational literacy and numeracy, including textbooks and teacher guides with structured lesson plans, professional development of teachers to effectively use the teaching-learning materials and apply the structured pedagogical approach for literacy and numeracy, mentoring of teachers and training of mentors on the correct use of the instrument and good coaching practices, enhancing literacy and numeracy programs in non-formal learning centres (NFLCs) by OOSC in DLI 6 will result in enhanced performance of pupils and students in basic education as will be manifested in their end of year results and other performance assessment measures, increased enrollment in basic education, reduction in OOSC, and their improved literacy and numeracy,.
51. Furthermore, activities associated with increased access to primary education (DLI 5), which include the establishment of twelve thousand public primary classrooms specially in areas where they do not exist and recruitment of qualified teachers and instructors for NFLCs will enhance access to education by people without access to education, guarantee that qualified and competent teachers are available in in NFLCs and primary schools in rural communities thus increasing enrollment of pupils in schools, reduction in OOSC, and improved literacy and numeracy of pupils in primary education.
52. Also, achieving DLI 8 (strengthened school management, governance, and financial autonomy) will ensure that schools receive and properly manage school grants, which will, in turn, encourage school attendance, particularly for children who have dropped out or are at risk of dropping out, and enable school management to purchase materials for teaching-learning purposes. This will ultimately reduce the number of OOSCs and improve the literacy and numeracy of pupils in primary education. Also, ensuring that school management committees are well constituted and own bank or other financial accounts that can be accessed and managed transparently will equally facilitate financial inclusion in Nigeria. Although formal financial inclusion has grown significantly in Nigeria

from 52 percent in 2020 to 64 percent in 2023, over 28.9 million adult Nigerians (26.0 percent) are still financially excluded<sup>9</sup>.

53. In addition, enhancing the availability of information for education system management, especially through digitizing school-based data collection and transmission, as detailed in DLI9, will facilitate the availability of data for basic education management in the states and Nigeria. Effective management of basic education will facilitate improved education outcomes, reduction in unemployment, and enhanced economic development.

### **3.5 Social Risks and Impact**

54. The HOPE-Edu PforR is also associated with some social risks. The construction and establishment of twelve thousand classrooms by communities in DLI 5 could potentially impact workers' health and safety for workers involved in construction works related to these DLI. The workers may be exposed to pollution caused by dust and noise at the work site. There could also be child labour, and influx of workers to the communities where rehabilitation work will occur which could lead to complaints from the host communities. This may affect the communities as there could be cases of sexual abuse and other vices, for example, drug abuse. Where the schools are not accessible for children and staff with disabilities, it may further create more exclusion. It is critical that the construction activities adhere to the National Accessibility Regulation<sup>10</sup> that provides the standards to ensure public infrastructures are accessible for all, including Persons with Disabilities.
55. There could be potential exclusion of children with disabilities where they are not targeted approaches to include them into the program as beneficiaries or make the schools inclusive. Other vulnerable groups that may be potentially excluded include children in conflict zones, nomadic households IDPs, exclusion due to ethnic considerations, etc. Child labour may occur, as most OOSC are already engaged in various forms of labour. There could be potential issues on child abuse, SEA/SH on children and sexual abuse or harassment of women in the hiring and appointment of qualified instructors, in 6. In addition, although social conflict as envisaged by ESSA, especially regarding armed conflict, is not applicable, exclusion of vulnerable groups and discrimination along the lines of ethnicity and religion in the distribution of TLMs, training of teachers in the use of structured pedagogy materials, coaching of mentors on the correct use of the instrument and good coaching practices, recruitment and hiring of trained instructors and teachers can result in complaints, social unrest and demonstrations. Conflicts and security risks could disrupt the Program, as schools and teacher can be targeted by insurgents. Resistance by member of the community who may view the Program especially for girls, as conflicting with cultural beliefs. On the contrary exclusion of stakeholders can also lead to mistrust and resistance of the Program.
56. In addition, the acquisition of land for civil works, construction and expansion of classrooms in communities associated with activities of DLI 5 could result in conflict among community members if not well handled, especially through an acceptable land donation protocol.

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<sup>9</sup> EfnA (2023) Access to financial services in Nigeria, 2023 report.

<sup>10</sup> [ncpwd.gov.ng/pdfs/44document.pdf](https://ncpwd.gov.ng/pdfs/44document.pdf)



57. In addition, the constitution of the School-Based Management Committee (SBMC) and the disbursement of grants and school-based management of grant may potentially be open to corruption and mismanagement of funds notwithstanding the recommendation that a bank account should be used for transparent management.

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

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

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

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

### 4.2 Policies Relevant to the HOPE-Edu Program

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

**Table 4.1: Nigerian Policies Relevant to the HOPE Program**

Policy	Objectives
National Policy on the Environment (Revised 2016)	<p><b>Overall Policy Goal</b></p> <p>To define a new holistic framework for guidance, management and protection of the environment as well as the conservation of natural resources for sustainable development' of the country.</p> <p><b>Objectives</b></p> <ul style="list-style-type: none"> <li>▪ Ensuring and securing the quality of Nigeria's environment to support good health and well-being;</li> <li>▪ Promoting efficient and sustainable use of Nigeria's natural resources and the restoration and maintenance of the biological diversity of ecosystems;</li> <li>▪ Promoting understanding of essential linkages between the environment, social and economic developmental issues;</li> <li>▪ Encouraging individual and community participation in environmental improvement initiatives;</li> <li>▪ Raising public awareness and engendering a national culture of environmental preservation; and</li> <li>▪ Building partnership among all stakeholders, including government at all levels, international institutions and governments, non-governmental agencies and communities on environmental matters.</li> </ul>
National Policy on Education	<p><b>Overall Policy Goal</b></p> <p>Nigeria's national education policy aims to standardize education across all levels, as outlined in the Constitution of the Federal Republic of Nigeria, 1999.</p>

	<ul style="list-style-type: none"> <li>▫ <b>Objectives</b> Philosophy: fostering national unity, promoting social mobility, and developing the individual's potential.</li> <li>▫ Universal Basic Education: Ensuring equal access to quality education for all citizens, regardless of background or socio-economic status.</li> <li>▫ Science &amp; Technology Education: Developing a skilled workforce and promoting technological advancement.</li> <li>▫ National Development: Preparing students to contribute to Nigeria's economic, social, and cultural development.</li> <li>▫</li> <li>▫ To Achieve These, the policy emphasizes: <ul style="list-style-type: none"> <li>▫ Accessibility: Expanding educational opportunities to underserved populations.</li> <li>▫ Relevance: Aligning education with Nigeria's development needs.</li> <li>▫ Quality: Improving teaching standards, curriculum, and infrastructure.</li> <li>▫ Efficiency: Optimising resources utilization and management.</li> </ul> </li> </ul> <p>The Federal Ministry of Education oversees the implementation of these policies, ensuring consistencies and progress towards Nigeria's educational objectives.</p>
National Gender Policy (2006)	<p><b>Overall Policy Goal</b></p> <p>The goal of the gender policy is to “build a just society devoid of discrimination, harness the dull potentials of all social groups regardless of sex or circumstance, promote the enjoyment of fundamental human rights and protect the health, social , economic and political well- being of all citizens in order to achieve equitable rapid economic growth, evolve an evidence based planning and governance system where human, social, financial and technological resources are efficiently deployed for sustainable development”. One of the principles of the gender policy is a general recognition that gender issues are central and critical to the achievement of national development goals and objectives and by extension water, sanitation and hygiene programs.</p> <p><b>Objectives</b></p> <ul style="list-style-type: none"> <li>▫ Establish the framework for gender responsiveness in all public and private spheres and strengthen capacities of all stakeholders to deliver their component mandate of the gender policy and National Strategic Framework</li> <li>▫ Develop and apply gender mainstreaming approaches, tools and instruments that are compatible with the macro- policy framework of the country at any given time towards national development.</li> <li>▫ Adopt gender mainstreaming as a core value and practice in social transformation, organisational cultures and in the general polity in Nigeria.</li> <li>▫ Incorporate the principles of CEDAW and other global and regional frameworks that support gender equality and women empowerment in the country's laws, legislative processes, judicial and administrative systems</li> <li>▫ Achieve minimum threshold of representation for women in order to promote equal opportunity in all areas of political social and economic life of the country for women as well as for men. <ul style="list-style-type: none"> <li>▫ Undertake women and men- specific projects as a means of developing the capabilities of both women and men, to enable them take advantage of economic and political opportunities towards the achievement of gender equality and women's empowerment.</li> <li>▫ Educate and sensitize all stakeholders on the centrality of gender equality and women's empowerment to the attainment of overall national development.</li> </ul> </li> </ul>

### 4.3 Relevant Nigerian National Laws

61. The national laws relevant to HOPE-Edu PforR are presented in Table 4.2.

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

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

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

11	Compulsory, Free and Universal Basic Education Act	<ul style="list-style-type: none"> <li>• This Act which took effect from 26<sup>th</sup> May 2004 was to ensure the Federal Government intervention for uniform and qualitative basic education in Nigeria, as assistance to states and local government areas which are constitutionally responsible for primary education. As stated in the Act, “without prejudice to the provisions of item 30 of Part II of the Second Schedule and item 2 (a) of the Fourth Schedule to the 1999 Constitution dealing with primary school education, the Federal Government's intervention under this Act shall only be an assistance to the States and Local Government in Nigeria for the purposes of uniform and qualitative basic education throughout Nigeria”.</li> <li>• The Act provides that every government in Nigeria shall provide free and compulsory free basic education for every child of primary and junior secondary school age and that parents shall send their children to school and ensure that their wards complete primary and junior secondary education. The government and stakeholders are to ensure that parents take their wards to school. The Act provides that services in public schools for primary and junior secondary education are free of charge.</li> <li>• The Act also established the Universal Basic Education Commission (UBEC) charged with the responsibility of policy formulation regarding basic education in Nigeria, receive block grant from federal government and allocate to states, among others. The Act also established the State UBEC and the local government education authority.</li> </ul>
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#### 4.4 Relevant Nigerian National Environmental Regulations

62. The national environmental regulations relevant to HOPE-Edu PforR are presented in Table 4.3.

**Table 4.3: Relevant Nigerian National Environmental Regulations**

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

#### 4.5 Nigeria’s Institutional Framework

##### 4.5.1 Nigeria’s Institutional Framework

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

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

S/N	Ministry	Relevant Functions and Responsibilities
1	Federal Ministry of Finance, Budget and National Planning	In collaboration with the World Bank controls disbursement of funds. Program funds will be channeled through the Federal Ministry of Finance.
2	Federal Ministry of Environment (FMEnv)	The focal ministry of environmental issues in Nigeria. They will lead in implementing environmental actions at the federal level as recommended in the PAP. They are also responsible for oversight and disclosure regarding EIA at the federal level.
3	The Federal Ministry of Labor and Employment	<ul style="list-style-type: none"> <li>▪ Development and promotion of productive employment policies and programs for employment generation and actualization of national employment policies of the Federal Government.</li> </ul>

		<ul style="list-style-type: none"> <li>▪ Skills Development, upgrading, certification, placement and empowerment of artisans, tradesmen, and applicants in various areas of national needs</li> <li>▪ Provision of Social Security Coverage, Welfare and Employee's Compensation to the nation's workforce</li> <li>▪ Provision of Labor Protection Services, supervision, enforcement, Education, Promotion of Social Justice, Ratification, Implementation and Review of National Labor Laws and Policies including collective bargained agreements.</li> <li>▪ Trade Unions Education and Training</li> <li>▪ International Labor Diplomacy</li> <li>▪ Promotion of Occupational Safety and Health under the Occupational Safety and Health Department</li> <li>▪ Enforcement of the Labor Laws under the Inspectorate Department (INSP)</li> </ul>
4	Federal Ministry of Women Affairs, Community and Social Development	<ul style="list-style-type: none"> <li>▪ The focal ministry of social issues in Nigeria. They will lead in implementing and monitoring environmental and social actions at the federal level as recommended in the PAP</li> </ul>
5	Federal Ministry of Education	<ul style="list-style-type: none"> <li>▪ The Federal Ministry of Education (FME) is responsible for policy formulation, coordination and management of education at the federal level. It has a mission to "to use education as a tool for fostering the development of all Nigerian citizens to their full potentials, in the promotion of a strong, democratic, egalitarian, prosperous, indivisible and indissoluble sovereign nation under God". The ministry in collaboration with its agencies, especially UBEC, is the focal ministry responsible for the Implementation of the education aspects of the Program at the federal level.</li> </ul>

#### 4.5.2 State Ministries Relevant to HOPE-Edu PforR

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

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

#### 4.6 Management of Land Acquisition in Nigeria

65. Land holdings in Nigeria can be broadly classified into public/government, private, and communal. Public/government lands are lands owned by the government comprising federal, state and local governments and their agencies. Private lands are defined as those whose ownership is vested in private individuals, families, and lands under

customary tenancies. Communal lands are lands which have their ownership vested in communities. These lands are usually administered by community leaders with the assistance of their councils of elders.

66. The legal basis for land acquisition and resettlement in Nigeria is the Land Use Act of 1978 which was modified in 1990. The critical sections regarding land acquisition are as follows:

- a) Section 1: Subject to the provision of this Act, all land comprised in the territory of each state in the Federation is hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provision of this Act.
- b) Section 2: (a) All land in urban areas shall be under the control and management of the Governor of each State, and (b) all other land shall be under the control and management of the local government within the area of jurisdiction in which the land is situated.

67. Therefore, according to the Land Use Act, all land in Nigeria is vested in the Governor of each State and shall be held in trust for the use and common benefit of all people. The administration of land area is divided into urban land which is directly under the control and management of the Governor in each State; and non-urban land, which is under the control and management of the Local Government. The Governor of each State has the right to grant statutory rights of occupancy to any person or any purpose; and the Local Government will have the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes.

#### **4.7 Grievance Redress Mechanism**

68. In Nigeria, there are different approaches, (but often specific to issues, institutions involved or projects), to make complaints and get redress. First, the justice system provides for courts where aggrieved persons can seek redress. Also there is the Public Complaints Commission where individuals and groups can lodge complaints against administrative injustice and get redress. Besides, the Ministry of Justice has the Legal Aids Council established under the law (Legal Aids CAP L9, 2011) which provides legal aid and advice to people with low income, among others. Some state governments also have different institutional arrangements for providing free legal services to the poor and vulnerable, for example, Public Defender Law and Multidoor Courthouse Law in Delta State Nigeria; and the Special People's Law in Lagos State Nigeria.



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

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

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

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

## 5.1: Summary of Systems Assessment

### Core Principle 1: General Principle of Environmental and Social Management

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

Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in Program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program's			
<b>Bank Directive for Program-for-Results Financing:</b> Program procedures will:			
<ul style="list-style-type: none"> <li>▪ Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level.</li> <li>▪ Incorporate recognized elements of environmental and social assessment good practice, including:               <ul style="list-style-type: none"> <li>▪ early screening of potential effects;</li> <li>▪ consideration of strategic, technical, and site alternatives (including the “no action” alternative);</li> <li>▪ explicit assessment of potential induced, cumulative, and trans-boundary impacts;</li> <li>▪ identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized;</li> <li>▪ clear articulation of institutional responsibilities and resources to support implementation of plans; and</li> <li>▪ Responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.</li> </ul> </li> </ul>			
<b>Applicability:</b> <u>YES</u> / NO			
The E&S team has conducted a screening of initial risks of the PforR. Environmental and social risks are posed due to ensuring the availability of essential teaching-learning materials (DLI1) ensure fidelity of the structured pedagogy (DLI3), increased access to quality pre-primary education (DLI4), and increased access to primary education (DLI5) , promote literacy and numeracy programs through non-formal basic education (DLI6) and enhanced availability of information for education system management (DLI8).			
Applicable RA/DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 1: Number of schools with Grades 1-3 TLMS</p> <p>DLI4: Number of LGEAs evaluating early learning results.</p> <p>DLI 5: Number of new primary classrooms created through community participation.</p> <p>DLI 6: Number of children who complete NFBE program.</p>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ At the Federal level, National Policies, Acts, Regulations for environmental management as well as institutional system's identifying environment procedures, roles and legislation to be followed in the country (See Chapter 4) are well defined and are consistent with Core Principle 1 of the Bank Policy and Directives on PforR Operation.</li> <li>▫ The national EIA system (EIA Act No. 86 of 1992) provides a comprehensive legal and regulatory framework for environmental and social impact</li> </ul>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ The EIA Act only focuses on the environmental standards. The World Bank standards on social issues is not addressed by the EIA particularly requirements on stakeholder engagement, labor, resettlement and land acquisition or ecosystem services.</li> <li>▫ At the national level there is no direct/ single ministry that is responsible for the totality of the social sustainability components, that is required by the World Bank Standards. What we have are</li> </ul>	<ul style="list-style-type: none"> <li>▫ Support should be provided at specific project levels and a technical assistance component be used to fill capacity gaps and establish E&amp;S risk management systems.</li> <li>▫ There is also a need to strengthen the E&amp;S capacity at the agencies, especially UBEC, responsible for the program implementation at the federal level.</li> <li>▫ There is a need to strengthen the E&amp;S management capacities of the Federal Government in terms of management of</li> </ul>

<p>DLI9: Percentage of schools included in current-year Annual School Census report. DLI 10: Number of National Learning Assessments completed.</p>	<p>assessment that is broadly consistent with the Core Principle 1 of the Bank Policy and Directive.</p> <ul style="list-style-type: none"> <li>▫ Environmental Assessment (EA) Department of the Federal Ministry of Environment is responsible for ensuring that the environmental risks are assessed, and adequate measures are taken to mitigate and or manage potential project impacts in line with the Federal Republic of Nigerian EIA Act of 1992.</li> <li>▫ E-waste regulation compels all manufacturers and importers of electrical equipment, e-waste collection centres, and recycling facilities to register with the <a href="#">E-waste Producer Responsibility Organization Nigeria</a> (EPRON)</li> <li>▫ NESREA is also empowered to enforce non-compliance with environmental laws and regulations.</li> </ul> <p>STATE LEVEL</p> <ul style="list-style-type: none"> <li>○ Most States in the federation have their own state environment Ministry or agency.</li> <li>○ Most of the sample states have robust framework regarding environmental assessment and management, for example, Delta State has environmental sanitation law, ecology law and waste management law. Lagos State has environmental protection law, etc.</li> <li>○ States also have strong coordination with Federal Ministry of Environment and NESREA.</li> </ul>	<p>isolated ministries performing isolated roles related to social concerns. See Chapter 4.</p> <ul style="list-style-type: none"> <li>▫ There is no requirement for consulting with local communities or vulnerable people in EIA process.</li> <li>▫ The capacity of the ministry and responsible agency to monitor and enforce environmental assessments is weak.</li> </ul> <p>STATE LEVEL</p> <ul style="list-style-type: none"> <li>▫ There are weak infrastructural and human resources capacities in delivering a robust ESIA process at the State level</li> <li>▫ The State environment ministries have weak capacities and mirror gaps in the federal environmental regulation and laws</li> <li>▫ The corresponding ministries to E&amp;S thematic areas at the state level do not interface well with the Ministry of Education and Health.</li> </ul>	<p>e-waste, and provision of adequate skilled human resources.</p> <ul style="list-style-type: none"> <li>▫ Need to strengthen the capacities of the E&amp;S officers that will be involved in the program.</li> <li>▫ Need for e-waste management procedure for the program to ensure that e-waste disposal is well covered under the Program.</li> <li>▫ There is a need to strengthen the E&amp;S management capacities of the states involved in terms of OHS, and provision of adequate skilled human resources to tackle E&amp;S issues especially at SUBEB.</li> </ul>
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## Core Principle 2: Natural Habitats and Physical Cultural Resources

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

<p><b>Bank Policy for Program-for-Results Financing:</b> Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.</p>			
<p><b>Bank Directive for Program-for-Results Financing:</b> As relevant, the program to be supported:</p> <ul style="list-style-type: none"> <li>▪ Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas.</li> <li>▪ Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities.</li> <li>▪ Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects</li> </ul>			
<p><b>Applicability:</b> <u>YES</u> / NO</p> <p>It is t expected that the Program will have any impact on natural habitats and physical cultural resources since it will involve new construction as twelve thousand new primary school classrooms will be constructed.</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 5: Number of new primary classrooms created through community participation</p> <p>DLI 6: Number of children who complete NFBE program</p>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>○ The Government of Nigeria also has introduced a number of forest policies, programmes and instruments (e.g., the National Forest Policy 2006 revised in 2020, National Biodiversity Strategy and Action Plan, Nigeria REDD+ Strategy) in an effort to reverse the deforestation trend and facilitate natural resources management and biodiversity conservation</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▪ Most of the State Governments have forest commissions or forest departments in their Ministry of Environment that are responsible for forest management and biodiversity conservation.</li> <li>□</li> </ul>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>○ Most of the forest laws and edits are old and outdated even dating back to colonial times and needs to be updated.</li> <li>○ Although strategies were developed, the have not been operationalized.</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▪ Most of the state forest laws and edits are old and outdated even dating back to colonial times and needs to be updated.</li> <li>▪ Most states have not implemented community forestry initiatives thus, most communities rarely conserve their forest resources</li> </ul>	<ul style="list-style-type: none"> <li>□ The federal and state governments should update their forest laws to reflect current realities.</li> <li>□ Federal and State UBEC should ensure that new primary school classrooms are not established in community forests or sacred groves and important biodiversity sites in the communities.</li> <li>□</li> </ul>

### Core Principle 3: Public and Worker Safety

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

<p><i>Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</i></p>			
<p><b>Bank Directive for Program-for-Results Financing:</b></p> <ul style="list-style-type: none"> <li>▪ Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed.</li> <li>▪ Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions.</li> <li>▪ Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.</li> </ul>			
<p><b>Applicability: YES / NO</b></p> <p>It is expected that the Program will have impact on public and worker safety since it may involve construction, rehabilitation and expansion of classrooms through increased access to quality pre-primary education (DLI4) and increased access to primary education (DLI5).</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 5: Number of new primary classrooms created through community participation</p> <p>DLI 6: Number of children who complete NFBE program</p>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ The legal/regulatory system of the country includes provisions for protecting worker, community and public safety. Some of these include, Labour Act of 2004, the Trade Union Amended Act of 2005, and the Employees Compensation Act of 2010. See Table III.5</li> <li>▫ NESREA has regulations to protect the public from hazardous chemicals, pesticides, and agrochemicals (National</li> </ul>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ The national EIA system does not comprehensively encompass aspects of public and worker safety.</li> <li>▫ There is limited awareness by the general public, especially farmers, on public health and safety issues, particularly in relation to exposure to hazardous materials, fertilizers and pesticide handling and safety precautions.</li> </ul>	<ul style="list-style-type: none"> <li>▫ The Federal Ministry of Environment should work towards improving the EIA system to incorporate important aspects lacking in the system, for example, issues relating to public and workers' safety and broader ESHS. Meanwhile, they should ensure that EIA reports submitted for review cover social issues especially relating to public and worker safety.</li> <li>▫ States and Federal Ministry of Environment, States and Federal</li> </ul>

	<p>Environmental (Hazardous Chemicals and Pesticides) Regulations, S.I. No 65, 2014).</p> <ul style="list-style-type: none"> <li>▫ The country also has some legal statutes and provisions to protect workers. Some of these include, Labour Act of 2004, the Trade Union Amended Act of 2005, and the Employees Compensation Act of 2010.</li> <li>▫ The federal government has the Ministry of Labor and their responsibilities include the protection of the rights of workers.</li> <li>▫ The Federal Child’s Right Act (CRA) (2003) codifies the rights of children in Nigeria. It has penalties on the use of child labour</li> <li>▫ The Nigerian Labor Law requires compliance with all national and international labor laws on occupational health and safety. The law requires routine inspection of workplaces, accident investigation, preparation of safety and health regulations, code of practice, guidelines and standards for various operations, processes and hazards.</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ Most state governments also have Ministries of Labor and these ministries also work to protect the rights of workers at the state level.</li> <li>▫ Some of the states have standalone laws and regulations to protect the rights of children and workers, e.g. Plateau State Child’s Right Law 2005 was gazette in the state in 2017.</li> <li>▫</li> </ul>	<ul style="list-style-type: none"> <li>▫Lack of awareness of relevant authorities’ staff to appreciate the need to ensure occupational health and safety. The FME have little experience in OHS in a project environment.</li> <li>▫The enforcement of national labor laws is weak.</li> <li>▫The national EA Department of the FMEnv and NESREA have not comprehensively incorporated OHS management into civil works.</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▫Some States lack OHS guidelines and procedures to be adopted by contractors, firms (especially MSEs), employers of labour and workers in most of the States</li> <li>▫Lack of awareness of relevant authorities’ staff to appreciate the need to ensure occupational health and safety.</li> <li>▫There is limited awareness and lack of interest by the general public, on public health and safety issues,</li> <li>▫Inadequate awareness of relevant authorities’ staff to appreciate the need to ensure OHS.</li> </ul>	<p>Ministry of Labour and States and Federal Ministry of Education should collaborate and build the capacity of the leaders in the different institutions in the sector in order for them to become knowledgeable on issues relating to occupational health and hazard and how to deal prevent and deal with it.</p> <ul style="list-style-type: none"> <li>▫ State governments should ensure that government and employers of labour in the state enroll or cover their workers under the Workers Compensation Insurance.</li> <li>▫ Provide on-site training to workers and laborers that will be involved in construction, rehabilitation and classroom expansion so that they will be familiar with OHS issues at their workplace.</li> <li>▫ Provide training supply chain laborers/employers</li> <li>▫ State governments should ensure that contractors, and other employers of labour especially those involving construction, rehabilitation, and waste management provide personal protective equipment for their workers.</li> <li>▫ Ensure that all workers engaged under medical waste collection are provided with a relevant personal protective and safety equipment.</li> <li>▫ Put in place a Grievance redress mechanism to handle workers conflicts.</li> <li>▫ State governments should ensure that first aid facilities are provided in schools.</li> </ul>
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## Core Principle 4: Land Acquisition

**Table 5.4: Assessment Core Principle 4: Land Acquisition**

Bank Policy for Program-for-Results Financing: <i>Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.</i>			
<p><b>Bank Directive for Program-for-Results Financing:</b> As relevant, the program to be supported:</p> <ul style="list-style-type: none"> <li>▪ Avoids or minimizes land acquisition and related adverse impacts;</li> <li>▪ Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy;</li> <li>▪ Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access;</li> <li>▪ Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and</li> <li>▪ Restores or replaces public infrastructure and community services that may be adversely affected.</li> </ul>			
<p><b>Applicability:</b> <u>YES</u> / NO</p> <p>The Program could involve land acquisition for the civil works including construction and expansion of classrooms for increased access to quality pre-primary education (DLI∞) and increased access to primary education (DLI6).</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 5: Number of new primary classrooms created through community participation</p> <p>DLI 6: Number of children who complete NFBE program</p>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ Nigeria has the Land Use Act of 1978 which was modified in 1990 is the legal basis of land acquisition and administration but doesn't include anything with regards land donation</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ States have Ministry of Land responsible for land acquisition, and documentation including issuing of right of occupancy and certificates of occupancy. In some states, the process has been digitized.</li> </ul>	<ul style="list-style-type: none"> <li>▫ The Land Use Act vests the Governor of a state with the control and management of urban lands while the non-urban lands are under the control of the local government. Given this, the Act does not provide for equitable resettlement of land owners when taken over by government for possible use based on what the Act refers to as overriding public interest.</li> <li>▫ Although community members can freely donate their lands under customary practices, there is no provision for voluntary land donation in the Land Use Act.</li> <li>▫ Given that there is no framework or legislation regarding voluntary land donation, there could be coercion for land donation leading to impoverishment of the people.</li> </ul>	<ul style="list-style-type: none"> <li>▫ There is need for each state to establish a framework/protocol for voluntary land donation under the program.</li> </ul>

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

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

<p><b>Bank Policy for Program-for-Results Financing:</b> Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.</p>			
<p><b>Bank Directive for Program-for-Results Financing:</b></p> <ul style="list-style-type: none"> <li>• Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program.</li> <li>• Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples.</li> <li>• Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.</li> </ul>			
<p><b>Applicability: YES / NO</b></p> <p>It is expected that vulnerable people may be impacted through discrimination based on gender and disability, ethnic bias, complaints given that the Program will involve recruitment and hiring of teachers and instructors in NFLC (DLI 4, 5 and 6). Note that there are no groups in Nigeria that meet the World Bank's criteria for Indigenous Peoples. However, we followed the third point on Bank Directive for indigenous peoples and vulnerable groups to look at the systems that address the needs of groups vulnerable to hardships, including women, youths and people with disabilities. The applicability in terms of specific DLIs is indicated below.</p>			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 1: Number of schools with Grades 1-3 TLMs</p> <p>DLI2: Number of Grades 1-3 teachers able to use structured pedagogy materials.</p> <p>DLI3: Number of Grades 1-3 teachers mentored on SPP</p> <p>DLI 5: Number of new primary classrooms created through community participation</p>	<p><b>FDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ Chapter IV of the Nigerian Constitution contains a variety of fundamental rights set out in Sections 33 - 44. of particular relevance is Section 42, which prohibits discrimination on the grounds of ethnic origin, sex (gender), religion, or linguistic affiliation.</li> <li>▫ There is a Federal Ministry of Women Affairs and Social Development that deals with all gender related issues especially as it concerns the vulnerable especially women youths and People living with</li> </ul>	<p><b>FFEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ There is a serious lack of trust in government and government ministries and agencies responsible for effective communication and engaging with the people, for example, the National Orientation Agency, Federal Ministry of Information and Culture and the Federal Ministries of Women Affairs and Social Development lack the requisite capacity and trust to build social contract.</li> <li>▫ There is lack of information and weak knowledge of the public especially vulnerable groups regarding the issues relating to the</li> </ul>	<ul style="list-style-type: none"> <li>▫ Deliberate efforts to strengthen multi-agency coordination e.g. between the National Orientation Agency, Federal Ministry of Information and Culture and the Federal Ministries of Women Affairs and Social Development to facilitate effective communication of government policies to the citizens, build trust in government and to strengthen the social contract, such as actions to tackle corruption and improve the delivery of services. Although these agencies are not directly involved in the implementation of HOPE.</li> </ul>



<p>DLI 6: Number of children who complete NFBE program</p>	<p>Disabilities (PWDs). They have a unit that deals with GBV and discrimination.</p> <ul style="list-style-type: none"> <li>▫ The Federal Ministry of Information and Culture has some institutions and agencies under it, for example, Radio Nigeria, Nigeria Television Authority and the National Orientation Agency that are responsible for communicating government programs and building trust with citizens.</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ Also, most state governments have Ministry of Women Affairs/Gender Affairs and Social Development. These ministries help to address the issues of GBV and discriminations of vulnerable people. Specifically, the Law in Ekiti State provides welfare package (cash/in-kind) to the elderly.</li> <li>▫ Many States have robust legal framework for Gender considerations, youths' affairs and social exclusions and discrimination.</li> <li>▫ Many states have laws and frameworks in dealing with violence and discrimination while some states, in addition, some have response teams to deal with GBV for example Kaduna State GBV Response Team.</li> <li>▫ Few States have adopted the Violence against persons Law, e.g Kaduna State (adopted in 2018) and Ekiti State (adopted in 2019)</li> </ul>	<p>economy, the need for effective tax system and payment of tax and the benefits of petroleum subsidy removal.</p> <ul style="list-style-type: none"> <li>▫ There is weak of capacity in Ministries of Women Affairs and Social Development to tackle the issues of GBV and other issues relating to gender and youths</li> <li>▫ There is no coordinated strategy for implementing a broad social inclusion agenda across public services in Nigeria.</li> </ul> <p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ Many States are yet to adopt the Violence Against Persons (Prohibition) Law.</li> <li>▫ Many states do not have adequate framework and institutional arrangement for combating GBV or prosecuting and punishing those involved in GBV thus offenders often do not get punished.</li> <li>▫ Many of the states do not have policy to ensure inclusion of minority/ ethnic groups at local level or the extreme poor in programs</li> <li>▫ Also, many of the States do not have gender policy or guidelines for dealing with vulnerable people and PWDs to ensure that they are not treated with contempt and partiality</li> <li>▫</li> </ul>	<ul style="list-style-type: none"> <li>▫ There is also a need to strengthen the capacities of the technical staff of these agencies to enhance communication of government programs and build trust with the citizens.</li> <li>▫ States without Gender Policy should set in motion the process of developing their gender policy which will contain guidelines and processes of preventing discrimination against vulnerable groups and PWDs.</li> <li>▫ States without a gender-based violence response team should quickly set up Domestic and Gender-based (Sexual) Violence Response Team (DSVRT) to for quick response to issues of GBV in the states.</li> <li>▫ Sates should carryout regular enlightenment programs for the public and capacity building programs for staff of gender/women ministries.</li> <li>▫ The program's implementing agencies should ensure that there is no discrimination in the recruitment of teachers and also put in place an effective GRM to ensure that people's complaints, especially regarding recruitment, are addressed effectively. .</li> <li>▫</li> </ul>
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## Core Principle 6: Social Conflict

**Table 5.6: Assessment Core Principle 6: Social Conflict**

<b>Bank Policy for Program-for-Results Financing:</b> Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.			
<ul style="list-style-type: none"> <li><b>Bank Directive for Program-for-Results Financing:</b> Considers conflict risks, including distributional equity and cultural sensitivities.</li> </ul>			
<b>Applicability:</b> YES / No			
Armed conflicts are not expected during the implementation of the Program, however, there could be disagreements, complaints, demonstrations and grievances may arise during the Program implementation due to lopsided or biased recruitment and deployment of teachers and possible conflict in land acquisition for construction and expansion of classrooms.			
Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>DLI 5 DLI 5: Number of new primary classrooms created through community participation</p> <p>DLI 6: Number of children who complete NFBE program</p>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>The constitution of the Federal Republic of Nigeria 1999 (as amended) provides in Section 17 (3) (g) that “the State shall direct its policy towards ensuring that provision is made for public assistance in deserving cases, or other conditions of need.</li> <li>Federal throughout the country with well-trained police and security forces who maintain the rule of law and also provides security against bandits and other forms of violent crimes and attacks.</li> <li>The military also provides security against armed insurgency and terrorism.</li> <li>There is also a justice system with courts where people can seek redress.</li> <li>The federal government also has the public complaints commission where people can make complaints regarding administrative injustices.</li> </ul>	<p><b>FEDERAL LEVEL</b></p> <ul style="list-style-type: none"> <li>Lack of a Grievance Redress Mechanism (GRM) for the poor and vulnerable. Although Nigeria has a justice system with courts where people can seek justice, poor and vulnerable people do not have the capacity to seek justice in courts.</li> <li>The available GRM are weak and ad-hoc and not properly institutionalized. This is a need to ensure that people’s grievances are properly redressed even when there is need to seek further redress if the individual is not satisfied with the outcome of existing arrangements.</li> </ul> <p><b>STATE LEVEL</b></p>	<ul style="list-style-type: none"> <li>Strengthened stakeholder engagement and grievance redress mechanisms and increased transparency to provide information and communication avenues for complaints and their resolutions.</li> <li>Build social contract with the people to facilitate success of proposed reforms.</li> <li>States without a framework to provide free legal services/legal aid and advice to the citizens should work towards providing that.</li> <li>States without an agency responsible for grievance redress and peaceful resolution of disputes should make effort to provide one.</li> <li>States should strengthen their GRM to facilitate resolution of conflicts.</li> </ul>

	<p><b>STATE LEVEL</b></p> <ul style="list-style-type: none"> <li>▫ State presence is strong throughout the country with well-trained police and security forces who maintain the rule of law and also provides security against bandits and during clashes between farmers and herders. There is also a justice system with courts where people can seek redress.</li> <li>▫ Some state government also have different institutional arrangements, e.g. Multidoor Courthouse Law and Public defender Law in Delta State.</li> </ul>	<ul style="list-style-type: none"> <li>▫ Most of the states do not have a GRM where poor and vulnerable can make complaints and get redress.</li> <li>▫ Although some states have ways of settling grievances, these arrangements are ad-hoc and needs to be properly institutionalized.</li> <li>▫ Available GRM frameworks are not formalized and not well recognized.</li> <li>▫</li> <li>▫ Most of the states do not have GRM mechanisms where poor and vulnerable can make complaints and get redress.</li> </ul>	
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## **SECTION VI: PROGRAM ACTION PLAN (PAP) AND RECOMMENDATIONS**

71. This section recommends measures that will be taken to strengthen system performance in line with the gaps and risks identified in section iv of the system assessment section to ensure that the Program interventions are aligned with the Core Principles 1, 3, 4, 5 and 6 of Bank Policy for Program-for-Results financing as stated below:
- a) Core Principle 1: General Principle of Environmental and Social Management:
  - b) Core Principle 3: Public and Worker Safety
  - c) Core Principle 4: Land Acquisition
  - d) Core Principle 5: Social Considerations - Indigenous Peoples and Vulnerable Groups:
  - e) Core Principle 6: Social Conflict.
72. These actions may be further refined and adjusted during the consultation process and the implementation of the Program.

### **6.1 Environmental Summary and Recommendations**

73. Although Nigeria has a well-defined environmental system that is close to the core principle of environmental assessment, some gaps remain. For example, the monitoring of EIA implementation is weak, as there is no tracking system to monitor environmental and social risks and performance. At the State and local levels, there is a weak capacity to deliver a robust environmental assessment process. OHS framework is also lacking, especially in schools. There is equally weak monitoring and evaluation of environmental and social systems at the state level, and enforcement is weak.
74. Given the environmental impact of this project, some recommendations are made as follows:
- e) Strengthening the E&S capacity under the project is needed. To facilitate this, E&S specialists should be recruited and trained for the Program.
  - f) E-waste waste management strategies must also be developed specifically for the program to facilitate their management. The requirements for e-waste management and EPRON should be included in the bidding document under HOPE-Edu PforR.
  - g) Also, E&S management procedures and requirements should be included in the documents for the procurement of civil works, materials and school expansion.
  - h) There is a need to develop an environmental management strategy or manual and OHS guidelines for schools.

### **6.2 Social Summary and Recommendations**

75. Given the identified social issues and weaknesses in the federal system, the following recommendations are made:
- a) Ensure that the recruitment of teachers and health workers to reduce the staffing gap and application of mechanisms to reduce absenteeism are carried out transparently to avoid ethnic or religious bias. Also, there is a need to ensure gender inclusion in the recruitment, deployment and management of teachers and health personnel.
  - b) Ensure a select number of teachers are trained on environmental management and safety in the school environment.
  - c) Establish a robust grievance redress mechanism specific to the Program to ensure that complaints from different stakeholders are well addressed.

- d) Strengthen provisions regarding gender-based violence (GBV) prevention and response, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment. This will include reviewing and, where appropriate, updating the Code of Conduct for education officers, teaching and non-teaching staff in the education sector.
- e) Develop guidelines and implement guidelines to make school accessible for vulnerable children, including those with disabilities, nomadic, IDPs, and ethnic considerations.
- f) Implement a whole-school approach to make schools safer for learning.
- g) Develop a land donation protocol for donating community land to be used for the construction and classroom expansion.

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

**Table 6.1: Program Action Plan (PAP)**

s/n	Action Description	Due Date	Responsible Party	Completion Measurement
1	Dedicate officials responsible for ensuring E&S PAP implementation	Prior to Effectiveness	UBEC, National Program Steering Committee (NPSC), National Program Coordinator (NPC), National Deputy Program Coordinator (NDPC)	Inclusion of the listed specialist in the team and maintained throughout the Program implementation, and Training Module and Implementation Support Supervision Report of World Bank Task team
2	Hire qualified Environmental and Social Officers and provide capacity building/system-strengthening program to strengthen their skills	No later than 3 months after effectiveness (will be reported during the first mission ISR)	SUBEC, State Program Steering Committee (SPSC), State Program Coordinator (SPC), State Deputy Program Coordinator (SDPC)	Assist the E&S PAP implementation official to execute the above responsibilities.
3	Develop e-waste management strategies for managing e-waste result from the program	Within one year of effectiveness or before the first bidding document for equipment procurement, whichever is earlier.	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	E-waste and healthcare waste management strategy document.
4	Strengthen provisions on gender-based	Within two years of effectiveness	SUBEC, State Program Steering Committee (SPSC), State Program	School management guidelines to include provisions on GBV prevention

<b>s/n</b>	<b>Action Description</b>	<b>Due Date</b>	<b>Responsible Party</b>	<b>Completion Measurement</b>
	violence (GBV) prevention and response in the school management guidelines, including clear protocols for identifying, reporting, and addressing instances of GBV within the school environment. This will include reviewing and, where appropriate, updating the Code of Conduct for education officers, teaching and non-teaching staff in the education sector.		Coordinator (SPC), State Deputy Program Coordinator (SDPC), Ministry of Education, Teachers Training, Civil Service Commission and Teaching Service Commission, the Teachers Registration Council of Nigeria (TRCN).	and response  Code on Conduct is reviewed and updated for GBV prevention where necessary
5	Develop a GRM specific to the Program	Within one year of effectiveness	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	Copies of GRM outlining details of implementation
6	Develop guidelines and implement a whole school approach to make school accessible for vulnerable children, including those with disabilities, nomadic, IDPs, and ethnic considerations.	Within two years of effectiveness	UBEC, NPSC, NPC, NDPC, SUBEC, SPSC, SPC, and SDPC	Guidelines developed and under implementation
7	Develop a community land donation protocol specifically for the Program.	Prior to Effectiveness	SUBEC, SPSC, SPC, and SDPC	Copies of land donation protocol outlining details of implementation

## SECTION VII. SUPPORTING ANNEXES AND REFERENCE DOCUMENTS

### A. Annex 1: Disbursement Linked Indicators (DLI)

Baseline	Prior Results	Period 1	Period 2	Period 3	Period 4
<b>1: Number of schools with Grades 1-3 teaching-learning materials (TLMs) (Number )</b>					
0	DLR 1.0: Grades 1-3 literacy/numeracy titles quality-assured and track-trace system approved in 18 states.	DLR 1.1: Competitive tenders for Grades 1-3 TLMs published.	DLR 1.2: Grades 1-3 TLMs available in 40,000 public primary schools.		DLR 1.3: Textbooks usage guidelines approved
<b>2: Number of Grades 1-3 teachers able to use structured pedagogy materials (Number )</b>					
0	0	DLR 2.1: Number of states that approve teacher training package	DLR 2.2: Number of grades 1-3 teachers able to use structured pedagogy materials.		
<b>3: Number of Grades 1-3 teachers mentored on Structured Pedagogy Program (Number )</b>					
0	0	DLR 3.1: Number of states that approve mentors training package and procure digital instruments	DLR 3.2: Number of public primary teachers mentored on SPP	DLR 3.3: Number of public primary teachers mentored on SPP	
<b>4: Number of LGEAs evaluating early learning results (Number )</b>					
0	0	DLR 4.1: Number of states that approve learning evaluation mechanism for Grades 1-2 literacy and mathematics		DLR 4.2: Number of LGEAs that evaluate early learning results.	DLR 4.3: Number of LGEAs that evaluate early learning results.
<b>5: Number of new primary classrooms created through community participation (Number )</b>					
0	DLR 5.0: Number of states that issue community partnership requests	DLR 5.1: Number of communities that sign government-community agreement to create new classrooms	DLR 5.2: Number of new classrooms created	DLR 5.3: Number of new (additional) classrooms created	DLR 5.4: Number of new (additional) classrooms created
<b>6: Number of children who complete NFBE program (Number )</b>					
0	0	DLR 6.1: Number of NFLCs that have Management	DLR 6.2: Number of children that complete NFBE program	DLR 6.3: Number of (additional) children that complete NFBE program	DLR 6.4: Number of (additional) children that complete NFBE program

		Committee, teacher, and TLMs			
<b>7:Percentage of core UBE funds managed at decentralized level (Percentage )</b>					
0	DLR 7.0: Revised UBE IFF/IFG approved	DLR 7.1: UBE funds allocated as per revised formula	DLR 7.2: Twenty per cent of core UBE funds de-centrally managed	DLR 7.3: Fifty per cent of core UBE funds de-centrally managed	DLR 7.4: Eighty per cent of core UBE funds de-centrally managed
<b>8:Percentage of public primary schools managing annual school grant (Percentage )</b>					
0	0	DLR 8.1: Number of states that approve ASG amount and management regulations	DLR 8.2: 70 percent of public primary schools that manage ASG	DLR 8.3: 80 percent of public primary schools that manage ASG	DLR 8.4: 90 percent of public primary schools that manage ASG
<b>9:Percentage of schools included in current-year Annual School Census (ASC) Report (Percentage )</b>					
0	DLR 9.0: National digital ASC model available.	DLR 9.1: State digital ASC system operational.	DLR 9.2: 90 percent of schools included in current-year State ASC Report	DLR 9.3: 90 percent of schools included in current-year National ASC Report	DLR 9.4: 95 percent of schools included in current-year State ASC Report
<b>10:Number of National Learning Assessments (NLAs) completed (Number )</b>					
0	DLR 10.0: First NLA completed				DLR 10.1: Second NLA completed

**Annex 2: Applicability of Core Environmental and Social Principles (CP) to the HOPE-Edu Program Result Area and Disbursement Linked Indicators (DLIs)**

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
RA 1: Improving Quality	DLI 1: Number of schools with Grades 1-3 TLMs	Applicable as the DLI will involve the printing and distribution of	Not Applicable	Not Applicable	Not Applicable	Applicable as vulnerable people may be	Not Applicable



<b>Result Area</b>	<b>DLI</b>	<b>CP1 Environment</b>	<b>CP2 Natural Habitats</b>	<b>CP3 Public &amp; Worker Safety</b>	<b>CP4 Land Acquisition</b>	<b>CP5 Vulnerable groups</b>	<b>CP6 Social Conflict</b>
		books which may impact on the environment through the forest destruction given the use of wood in paper production.				discriminated against in the distribution and use of TLMs	
	DLI 2: Number of Grades 1-3 teachers able to use structured pedagogy materials	Not Applicable, device (including the lesson plans and other materials), which will be linked to a computer back-end platform.	Not Applicable	Not Applicable works supported by the DLI	Not Applicable	Applicable as vulnerable people may be discriminated against in training of teachers in SPP. .	Not applicable.
	DLI3: Number of Grades 1-3 teachers mentored on SPP	.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are construction and rehabilitation works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI	Applicable as vulnerable le people may be discriminated against in training of mentors. le	Not Applicable

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
RA 2: Increasing access.	DLI4: Number of LGEAs evaluating early learning results	Applicable, as there could be e-waste given possible use of digital devices for evaluating of learning in literacy and numeracy.	Not applicable as there are no civil works supported by the DLI.	Not applicable as there are no civil works supported by the DLI..	Not applicable as there are no civil works supported by the DLI..	This is not applicable.	This is not applicable.
	DLI5: Number of new primary classrooms created through community participation	This is Applicable as there are procurement of civil works, construction and expansion of classrooms supported by the DLI	This is applicable as civil works procurement and construction may impact natural habitats.	This is applicable as procurement of civil works, construction activities may impact public and workers health and safety.	This is applicable as there could be land acquisition in communities to facilitate construction and expansion of classrooms.	This is applicable as the hiring of qualified teachers may be biased against vulnerable people especially women.	Social conflict as envisaged by ESSA especially regarding armed conflict is not applicable. However, there could be conflicts over land acquisition and in the hiring of qualified teachers.

<b>Result Area</b>	<b>DLI</b>	<b>CP1 Environment</b>	<b>CP2 Natural Habitats</b>	<b>CP3 Public &amp; Worker Safety</b>	<b>CP4 Land Acquisition</b>	<b>CP5 Vulnerable groups</b>	<b>CP6 Social Conflict</b>
	DLI 6: Number of children who complete NFBE program	This is Applicable as there are procurement of civil works, construction and expansion of classrooms for NFLCs supported by the DLI	This is applicable as civil works procurement and construction may impact natural habitats	This is applicable as procurement of civil works, construction and rehabilitation activities may impact public and workers health and safety able	This is applicable as there could be land acquisition in communities to facilitate construction and expansion of classrooms	This is applicable as the hiring of instructors for NFLCs may be biased against vulnerable people especially women. Risk of exclusion of Persons with Disabilities.	Social conflict as envisaged by ESSA especially regarding armed conflict is not applicable. However, there could be conflicts over the hiring and training of instructors for NFLC.
RA 3: Enhancing key systems	DLI7: Percentage of core UBE funds managed at decentralized level	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI
	DLI8: Percentage of public primary	Not Applicable as there are no physical works	Not Applicable as there are no physical works	Not Applicable as there are no physical works	Not Applicable as there are no physical works	Not Applicable as there are no	Not Applicable

<b>Result Area</b>	<b>DLI</b>	<b>CP1 Environment</b>	<b>CP2 Natural Habitats</b>	<b>CP3 Public &amp; Worker Safety</b>	<b>CP4 Land Acquisition</b>	<b>CP5 Vulnerable groups</b>	<b>CP6 Social Conflict</b>
	schools managing annual school grant	supported by the DLI	supported by the DLI	supported by the DLI	supported by the DLI	physical works supported by the DLI	
	DLI9: Percentage of schools included in current-year Annual School Census report	Applicable, as there could be e-waste due to digitization of annual school census (ASC) database and digital publication of statistical report	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI
	DL10: Number of National Learning Assessments completed	Applicable, as there could be e-waste due to possible digitization of national learning assessments.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI

**Annex 3: Key Environmental & Social Risks and Benefits Associated with Program Activities**

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
1: Improve quality	1. Number of schools with Grades 1-3 TLMs	Negligible	The delivery of essential teaching-learning materials (TLMs) associated with this DLI will involve printing textbooks, especially to facilitate literacy and mathematics. This will consume a large amount of paper, thus impacting forests and trees used to manufacture paper. The digitization of the learning packages could reduce this.	The delivery of teacher guides (lesson plans and other material) and text books in literacy and mathematics and the training of teachers on these materials under this DLI will result in increased enrollment in basic education, reduction in OOSC, improved literacy and numeracy, enhanced performance of pupils and students in basic education.	Potential exclusion if textbooks or learning materials are not accessible
	2. Number of Grades 1-3 teachers able to use structured pedagogy materials literacy and numeracy	Negligible	Negligible	The building of Grades 1-3 teacher capacity to effectively use the teaching-learning materials and apply the structured pedagogical approach for literacy and	.Negligible

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				numeracy will result in increased enrollment in basic education, reduction in OOSC, improved literacy and numeracy, enhanced performance of pupils and students in basic education, thus enhancing education outcome and subsequent poverty reduction and economic development impact.	
	DLI 3: Number of Grades 1-3 teachers mentored on SPP	Negligible	Negligible	Supporting teachers to effectively teach literacy and numeracy using the structured pedagogy approach and to the regular evaluation of foundational numeracy and literacy sub-skills	Negligible

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				will result in increased enrollment in basic education, improved literacy and numeracy, enhanced performance of pupils and students in basic education, thus enhancing education outcome and subsequent poverty reduction and economic development impact.	
RA 2: Increasing Access.	4. Number of LGEAs evaluating early learning results	Negligible	The evaluations of learning in literacy and numeracy for Grades 1 and 2 could be done using digital devices and thus may lead to the generation of e-waste.		
	5. Number of new primary classrooms created through community participation	Negligible	The construction and establishment of new classroom is associated with significant direct and indirect environmental risks such as solid waste generation, noise, land degradation, air pollution and destruction of flora	The establishment of public primary classrooms and will enhance access to education by people without access to education, guarantee that qualified and competent teachers are	The establishment of classrooms by communities especially for NFLC could potentially impact workers' health and safety The workers may be exposed to

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
			and fauna, which could lead to biodiversity loss	available in pre-primary and primary schools in rural communities thus increasing enrollment of pupils in schools, reduction in OOSC, and improved literacy and numeracy of pupils in pre-primary and primary education.	<p>pollution caused by dust and noise at the work site. There could also be child labour issues, influx of workers to the communities where rehabilitation work will occur. This may affect the communities as there could be cases of sexual abuse and other vices, for example, drug abuse.</p> <p>There could be potential exclusion and discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of children and women in the hiring of qualified teachers.</p>



Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
					<p>Discrimination along the lines of ethnicity and religion in the recruitment and hiring of teachers can result in complaints, social unrest and demonstrations.</p> <p>In addition, the acquisition of land for construction and expansion of classrooms in communities could result in conflict among community members.</p>
	6. Number of children who complete NFBE program	Negligible	The construction and establishment of new classroom is associated with significant direct and indirect environmental risks such as solid waste generation, noise, land degradation, air pollution and destruction of flora and fauna, which could lead to biodiversity loss	The establishment of public primary classrooms and will enhance access to education by people without access to education, guarantee that qualified and competent teachers are available in pre-primary and primary schools in rural communities thus increasing enrollment of	The establishment of classrooms by communities especially for NFLC could potentially impact workers' health and safety The workers may be exposed to pollution caused by dust and noise at the work site. There could also be child labour

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				<p>pupils in schools, reduction in OOSC, and improved literacy and numeracy of pupils in pre-primary and primary education</p>	<p>issues, influx of workers to the communities where rehabilitation work will occur. This may affect the communities as there could be cases of sexual abuse and other vices, for example, drug abuse.</p> <p>There could be potential exclusion and discrimination of vulnerable groups, ethnic considerations and sexual abuse or harassment of children and women in the hiring of qualified teachers.</p> <p>Discrimination along the lines of ethnicity and religion in the</p>

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
					<p>recruitment and hiring of teachers can result in complaints, social unrest and demonstrations.</p> <p>In addition, the acquisition of land for construction and expansion of classrooms in communities could result in conflict among community members.</p>
Result Area 3: Enhancing key systems	DLI 7: Percentage of core UBE funds managed at decentralized level	Environment benefits will accrue through the use of school-based management grants for cleaning and maintaining school premises.	Negligible	Achieving this DLI will ensure that schools receive and properly manage school grants, which will, in turn, encourage school attendance, particularly for children who have dropped out or are at risk of dropping out, and enable school management to purchase materials for teaching-	The constitution of the School-Based Management Committee (SBMC) and the disbursement of grants and school-based management of grants may potentially be open to corruption and mismanagement of funds, notwithstanding the recommendation that

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				<p>learning purposes. This will ultimately reduce the number of OOSCs and improve the literacy and numeracy of pupils in primary education.</p> <p>Also, ensuring that school management committees are well constituted and own bank or other financial accounts that can be accessed and managed transparently will equally facilitate financial inclusion in Nigeria</p>	<p>a bank account should be used for transparent management. Also, there could be discrimination of vulnerable people in the use and management of the grants.</p>
	<p>DLI8: Percentage of public primary schools managing annual school grant</p>	<p>Environment benefits will acre through the use of school-based management grants for cleaning and maintaining school premises.</p>	<p>Negligible</p>	<p>Achieving this DLI will ensure that schools receive and properly manage school grants, which will, in turn, encourage school attendance, particularly for children who have dropped out or are at risk of dropping out, and enable school</p>	<p>The constitution of the School-Based Management Committee (SBMC) and the disbursement of grants and school-based management of grants may potentially be open to corruption and mismanagement of funds,</p>

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				<p>management to purchase materials for teaching-learning purposes. This will ultimately reduce the number of OOSCs and improve the literacy and numeracy of pupils in primary education.</p> <p>Also, ensuring that school management committees are well constituted and own bank or other financial accounts that can be accessed and managed transparently will equally facilitate financial inclusion in Nigeria</p>	<p>notwithstanding the recommendation that a bank account should be used for transparent management.</p> <p>Also, there could be discrimination of vulnerable people in the use and management of the grants.</p>
	DLI 9: Percentage of schools included in current-year Annual School Census report	Negligible	The digitization of annual school census and data collection and transmission could result in the generation of waste from electrical electronic equipment (WEEE) or e-waste.	Enhancing the availability of information for education system management, especially through digitizing annual school census and school-based data collection and transmission will facilitate the availability of data for	Negligible

<b>Result Areas</b>	<b>DLIs</b>	<b>Environmental Benefits</b>	<b>Environmental Risks</b>	<b>Social Benefits</b>	<b>Social Risks</b>
				basic education management in the states and Nigeria. Effective management of basic education will facilitate improved education outcomes, reduction in unemployment, and enhanced economic development.	
	DLI10: Number of National Learning Assessments completed	Negligible	The assessments could be digitized and thus generate waste from electrical electronic equipment (WEEE) or e-waste.	Achieving this DLI will equally facilitate the measurement and reporting of education outcomes in Nigeria and, ultimately facilitate improved education outcomes and the associated benefits.	Negligible

**Annex 4: Attendance at Stakeholder Consultation Held on December 5, 2024**

Name	Organization	Designation	State
Felicia Vanessa Ango	SUBEB	DPRS	Kebbi
Hussaina Bello	UBEB	Principal Project Officer	FCT
Tracy Onabis	Inclusive Friends Association (IFA)	Program Officer (Inclusive Education)	FCT
Obanla Akindele	SUBEB	M&E Officer	Lagos
Inyingi Irimagha	Gender and Development Action	Senior Programme Officer	Lagos
Florence Nene Ugwu	PAV	Southeast Regional Rep	
Maina Tata Adams	SUBEB		Gombe
Agbo Christian Obiora	The Qualitative Magazine	ED (Editor)	
Oluwakemi Odusanya			
Andrew Orlando Oaikhena	BudgIT Foundation with PAV	Stakeholder Manager	
Greg Chijioke Anyaegbudike	Partnership Amplified Voices (PAV), a society partnership that supports accountability and social inclusion in Nigeria, with significant support from the World Bank		
Vahyala Kwaga			
Florence			
Jide			
Rejoice Asoloko Manasseh			
Rasak Adekoya			
Judith Nwokoro			
Akindele Obanla			
Adams Maina Tata			
Olufunmilola Temitayo	Social Development specialist	WB	
Nnaemeka Chukwuone	Consultant	WB	

Cindy Ijeoma Ikeaka	Senior Social Development specialist	WB	
Elijah Abiodun Siakpere	Senior Social Development specialist	WB	
Lucky Erhaze	Environmental Specialist	WB\$	
Halima Femi Pat Natson	Social Development consultant	WB	
Stella Nneka Eze		WB	
Samson Thomas		WB	
Oluwafunmilayo R Aladesuyi		WB	

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<sup>i</sup> Paper commissioned for the 2020 Global Education Monitoring Report, Inclusion and education

<sup>ii</sup> World Bank. 2016. Disability Inclusion in Nigeria. A Rapid Assessment