

Republic of The Gambia



Ministry of Higher Education, Research, Science & Technology

**Environmental and Social Management Plan (ESMP)
For the Second Africa Higher Education Centers of Excellence for Development Impact Project
(P169064)**

November 2021

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LIST OF ACRONYMS

AIDS	Acquired Immune Deficiency Syndrome
C-ESMP	Contractor's Environmental and Social Management Plan
COC	Code of Conduct
COVID-19	Coronavirus Disease 2019
ECD	Early Child Development
ESIA	Environmental and Social Impact Assessment
EFP	Environmental.0 Focal Point
EIA	Environmental Impact Assessment
ESHS	Environmental and Social Health & Safety
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GRC	Grievance Redress Committee
GM	Grievance Mechanism
GTTI	Gambia Technical Training Institute
HIV	Human Immunodeficiency Virus
LGA	Local Government Area
MoBSE	Ministry of Basic and Secondary Education
MoGCS	Ministry of Gender, Children and Social Welfare
MoHERST	Ministry of Higher Education, Research, Science and Technology
NAWEC	National Water and Electricity Company
NCAC	National Centre for Arts and Culture
NEA	National Environment Agency
NEMA	National Environment Management Act
NEMAC	National Environmental Management Council
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OP	Operational Policy
PAP	Project Affected Persons
PASET	Partnership for Skills in Applied Sciences, Engineering and Technology
PCU	Projects Coordination Unit (Min. of Basic and Secondary Education)
PDO	Project Development Objective
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SFP	Social Focal Point
STD	Sexually Transmitted Disease
STI	Sexually Transmitted Infection
TAC	Technical Advisory Committee
TOR	Terms of Reference
USET	University of Science, Engineering and Technology
VAC	Violence Against Children
WB	World Bank
WCR	West Coast Region
WHO	World Health Organization

EXECUTIVE SUMMARY

This report is the Environmental and Social Management Plan (ESMP) of the Second Africa Higher Education Centers of Excellence for Development Impact Project (P169064). In its drive to restore sound democratic rule, and sustainable socio-economic development, the Government of The Gambia developed a medium-term National Development Plan, 2018-2021 which is aligned with the Sustainable Development Goals, 2016-2030 and the African Union Agenda, 2063. The Project development objective (PDO) is to improve the quality, quantity, and development impact of education in selected universities through regional specialization and collaboration. The project consists of three components, namely: (i) *Establishing new and scaling-up well-performing existing ACE centers for development impact; (ii) Fostering regional partnerships and scholarships; and (iii) Enhancing national and regional level Project facilitation and M&E.*

As part of the revitalization of technical and vocational education and training, the Gambia Technical Training Institute (GTTI) will be transformed into a Technology and Engineering University, and the ACE Impact Project will contribute towards these processes by creating an emerging Centre of Excellence on Science, Technology and Engineering for Entrepreneurship. The project will be carried out on land allocated within the premises of the Gambia College in Brikama.

The project will be implemented by the Gambia Technical Training Institute (GTTI) with the support of the Projects Coordination Unit (PCU) of the Ministry of Basic and Secondary Education (MoBSE) on behalf of the Ministry of Higher Education, Research, Science and Technology (MoHERST) as the executing agency. Activities will mainly focus on improving the quality of higher education programs, increasing the impact of undergraduate and postgraduate education and applied research on economic development, and increasing the supply of higher education graduates in priority sectors such as engineering, architecture etc.

According to the World Bank Operational Policies project risk classification, the Second ACE Impact is a Category B project with respect to potential environmental and social impacts which means the potential negative environmental and social impacts have known mitigation measures which can be effective. The objective of this ESMP is to assess and mitigate potential negative environment and social (E&S) risks and impacts consistent with the Operational Policies (OP) of the World Bank. The plan also includes the procedure and organizational and reporting system for its implementation.

The effective implementation and monitoring of the ESMP will require capacity building of the project staff which is ongoing with support from World Bank environmental and social specialists (there are Environmental and Social Specialists at MoBSE who were mentored by very experienced local Environmental and Social Consultants hired by MoBSE), involvement of the National Environment Agency (NEA) in the process and effective follow up by the Safeguards Unit of the Projects Coordination Unit (PCU) at MoBSE.

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

Description of the Project

The Gambia's vision for national development has prioritized building its human capital in key national development sectors. One of its central objectives is to strengthen the capacities of Ministries, Departments and Agencies (MDAs) in a bid to increase knowledge, technology absorption, technical and operational capacity as well as knowledge-based competitive advantages. Central to this is to train the staff of training institutions to provide them with the opportunities of sustainably providing the required competencies needed in the national development priority areas. As part of the implementation process,

MoHERST will seize the opportunity provided by the ACE Impact Project to address the mismatch and the capacity gaps specific to science, technology, engineering, and entrepreneurship.

The World Bank interventions under the ACE Impact project are articulated in 3 Components:

Component 1: strengthen the capacity in 23 ACE centers and their host institutions (supply-side). This ESMP falls under this component where activities will include the construction of Academic and allied administrative buildings for the faculties of:

1. Civil Engineering,
2. Mechanical Engineering
3. Electrical/Electronics

Component 2: to expand the regional impact of the ACEs funded under Component 1 by providing demand-side funding for partnering institutions and regional students to purchase training and consulting services from the ACEs that are most relevant to their teaching and research goals.

Component 3: will fund the Association of African Universities, which will continue as the Regional Facilitation Unit (RFU). The RCU will facilitate the ACE Impact I project's regional activities and support the centers under the project. This component will also finance project implementation support at the national level.

Policy, Legal and Institutional Framework

The National Policy Framework

Policies

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

Acts and Regulations

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

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

- UN Framework Convention on Climate Change (UNFCCC) 1994
- Convention on the Rights of the Child (CRC), August 1990
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1993
- International Covenant on Economic, Social and Cultural Rights (ICESCR), 1978
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (CMW), 2017
- Convention on the Rights of Persons with Disabilities, 2015

- African Charter on Human and People’s Rights (ACHPR) (1983) and Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018

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

- Ministry of Higher Education, Research, Science and Technology (MoHERST)
- Project Coordinating Unit (PCU) (MoBSE)
- Ministry of Health (MoH)
- Ministry of Gender, Children and Social Welfare (MoGCS)
- National Environment Agency (NEA)
- Ministry of Environment, Climate Change and Natural Resources (MECCNAR)
- Gambia Technical Training Institution (GTTI)

World Bank Safeguard Policies Triggered by the Project

These include:

- i. **OP 4.01 Environmental Assessment** (including social assessments and risk mitigation and public participation and stakeholder engagement and grievance mechanism). The objective of this policy is to ensure that projects financed by the Bank are viable and environmentally feasible. It covers the impacts on the physical environment (air, water, and land, etc.); human health and safety; social aspects (impacts on communities and vulnerable groups, Indigenous peoples, physical and/or economic displacement, and physical cultural resources); and transboundary and global environmental aspects. EA considers natural and social aspects, risks and impacts in an integrated way. It also considers the variations in project and country conditions; the findings of country environmental and social studies; the country's overall policy framework, national legislation, and institutional capabilities related to the environment and social aspects; and obligations of the country, pertaining to project activities, under relevant international environmental and social treaties and agreements. This policy requires that environmental and social consequences be identified early in the project cycle and considered in the selection, location, planning, and design of the project to minimize, prevent, reduce, or compensate for adverse impacts and thereby maximize positive impacts and include processes for mitigation and management of environmental and social impacts during the project cycle.
- ii. **OP 4.04 Natural Habitats:** protects, maintains, rehabilitates natural habitats and their functions. This Policy is triggered in the ACE Impact Project because the subproject site is located near a forest. This policy stresses on the need for conservation of natural habitats and require other measures that protect and enhance the environment.
- iii. **OP/BP 4.11 Cultural Physical Resources:** provides cultural heritage guidelines to avoid or mitigate adverse impacts of development projects. This policy applies to the following projects: (i) any project involving major excavation, demolition, earthworks, flooding, or other environmental modifications; (ii) any project located on or near a site recognized as cultural property; (iii) any project designed to support the management or conservation of physical cultural property. As part of the ACE Impact Project, this will also concern buildings of historical value, and which would be the subject of rehabilitation works.

Institutional Framework

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

- i. **National Environment Agency (NEA):** The NEA enforces the NEMA, 1994 and EIA Regulations 2014, and reviews the ESIA report to grant Environmental Approval for the Project

- ii. **Ministry of Higher Education, Research Science and Technology (MoHERST):** MoHERST Oversees Project Implementation of World Bank Policies and law of The Gambia.
- iii. **Gambia Technical Training Institution (GTTI):** Project Proponent and will lead implementation the ESMP.
- iv. **Projects Coordination Unit (PCU)**The PCU which is located in MoBSE will support GTTI in the Coordination of the project implementation process.
- v. **Ministry of Environment, Climate Change and Natural Resources (MECCNR):** Oversees the NEA and implementation of environmental laws and policies of The Gambia.
- vi. **Office of the Governor, WCR:** Oversee the Regional Technical Advisory Committees (TAC) for WCR who will support the implementation and monitoring processes of the Project at Regional levels.
- vii. **Ministry of Health:** Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development.
- viii. **Women’s Bureau**-Under the Ministry of Women, Children and Social Welfare, specifically promotes gender equity and women’s empowerment in The Gambia. It ensures the rights of women affected by the Project are protected; participates in sensitization on gender issues during pre-construction, construction, and operation phases.
- ix. **Department of Labour:** Protection of employee rights; Protection against child labour; Response to complaints and reports such as accidents, abuse, and discrimination at work.
- x. **Department of Social Welfare:** Protects and promotes the rights of vulnerable people such as children, women and the disabled; supports and guides the process during related grievances; participates in sensitization on GBV, SEA, SH, VAC, etc.

Environmental and Social Baseline

This section describes the general environmental and social baseline conditions of the West Coast Region especially in Brikama, where the Project will be implemented.

West Coast Region is a multi-ethnic society exhibiting a high degree of ethnic and religious tolerance and diversity. The region’s main ethnic groups are the Mandinka, Wollof, Fula, Jola, Manjago, Serer and Sarahule groups. The Mandinkas constitute most of The Brikama’s population, followed by the Jola and Wollof groups.

The Physical Environment

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

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

The Biological Environment

The site has no significant plants or animal species which might be affected. Only shrubs are on the land.

Socio- Economic Baseline

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

Environment and Social Components likely to be affected by the Project

COMPONENTS AFFECTED		
Physical	Biological	Human
Noise	Vegetation & Wildlife	Public and workers' health and safety
Air quality		Labor-related issues
Soils		Vulnerable groups (people with disabilities, women-headed households, young and old people, illiterate persons, etc.)
		College Community stability

Potential Environmental and Social Impacts and Risks

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

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

Environmental Risks and impacts	Social Risks and impacts
<ul style="list-style-type: none"> • Loss of vegetation and trees, soil erosion or contamination, interruption of natural waterways or drainage systems or the destruction of natural habitats for various fauna, and destruction of protected sites prior to construction. • Poor management of waste produced during the civil work/pollution of the receiving environment • Noise and Vibration during civil works/ Noise pollution. 	<ul style="list-style-type: none"> • Grievances between the workers and the school Community due to lack of social inclusion, SEA/SH, and other impacts. Grievances from nearby communities due to traffic, lack of information, handling of waste, etc. • Violence Against Children (VAC). As the Project is located around a community, there is a possibility of having children around especially as it is not far from the highway where they might be commuting

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| <ul style="list-style-type: none"> • Possible need of water from the College for construction/ Problem of availability of the resource. • Failure to restore the sites to, at least, their previous condition in respect to vegetation cover, protection by fences from unwanted encroachment and construction debris. • Air Quality Deterioration (Dust Pollution) • Water Pollution and Contamination including damages to major underground water pipelines and Overhead Power transmission lines. • Waste dumping or bush fire in the nearby Nyambai Forest. • Damage to infrastructure and public utilities. | <p>to go to school or run errands. This may bring about interaction between the children and the workers although this is highly unlikely.</p> <ul style="list-style-type: none"> • SEA/SH between workers and women who study and sell around the Gambia College premises particularly the female students at the College and the vendors at the livestock Market next to the Gambia College. • Illegal intrusion in the nearby Nyambai Forest by the workers. • Discrimination in the recruitment of workers. • Risks of non-payment or delayed payment for services rendered by workers to the contractor; mistreatment of contractor of workers and other labor rights infringements. • Risks of child labor when children below the minimum age for employment are used as temporary replacements for workers. • Potential risks related to work accidents or communicable diseases with the workers or community who will be recruited including the transmission of COVID-19 and STDs, |
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Environmental and Social Management Plan (ESMP)

The potential impacts and mitigation measures identified for all the various activities are further expanded in an ESMP matrix (in chapter 8). For ease of reference during implementation, each mitigation activity includes the responsible party:

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

Roles and Responsibilities for ESMP Implementation

Implementation of this ESMP is the responsibility of the PCU MoBSE and GTTI. However, mitigation measures with respect to civil works activities will be the responsibility of the contractor, and the PCU MoBSE and GTTI will monitor and supervise. The PCU MoBSE and GTTI will also be responsible for other social mitigation measures not covered and monitored by the contractor to ensure compliance with the ESMP.

The PCU MoBSE and GTTI will be responsible for follow-up, and to ensure that the ESMP is fully implemented with the support of the PCU MoBSE Environmental Safeguards Specialist (ESS) and Social Safeguards Specialists (SSS) who will work with the Environmental & Social Focal Points to be recruited by GTTI. Clauses will be included in the Contractor’s agreements that will ensure compliance and coordination with the GRM, among others.

The college and local community will also have the responsibility of ensuring that the staff, students and members of the community avoid the work site and report to MoBSE, MoHERST, GTTI or relevant authorities, issues of concern related to the Project; the PCU, GTTI and Contractor will engage the Project

affected People regularly as an oversight measure in this regard, and conduct sensitization sessions to ensure communities are aware of reporting measures and understand Project risks.

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

1. INTRODUCTION

Project Description

The Africa Higher Education Centers of Excellence (ACE) project is a World Bank capacity building initiative that funded specialized programs within 24 Centers of Excellence in Western and Central African universities, as well as the Government of The Gambia. The Gambia's vision for national development has prioritized building its human capital in key national development sectors. One of its central objectives is to strengthen the capacities of Ministries, Departments and Agencies (MDAs) in a bid to increase knowledge, technology absorption, technical and operational capacity as well as knowledge-based competitive advantages. Central to this is to train the staff of training institutions to provide them with the required competences needed in the national development priority areas. As part of the implementation process, MoHERST will seize the opportunity provided by the ACE Impact Project to address the capacity gaps specific to science, technology, engineering, and entrepreneurship. These constraints, (capacity gaps specific to science, technology, engineering, and entrepreneurship) around these disciplines weighs heavily on the nation's ability to curb youth unemployment and underemployment. The overall objective of the intervention (the construction of the 3 schools of Engineering at the University of Science, Engineering and Technology) is to contribute to socio-economic development through scientific research and innovation by creating an emerging center of excellence on science, technology, and engineering for entrepreneurship. However, by the end of the Project (expected June 2024), the intervention in the Science, Technology, Engineering and Mathematics (STEM) is expected to:

1. Improve infrastructure and systems of higher learning through the provision of adequate SMART infrastructure
2. Enhance capacity of teaching staff and faculty of the institutions of higher learning
3. Ensure relevance and responsiveness of RID to the needs of industry, society, and national development priorities
4. Establish and cement collaborative research between institutions of higher learning and the industry
5. Establish strong interdisciplinary research and innovation in strategic areas of national and regional interest
6. Mobilize resources for sustainable research, innovation, and development.

The Second Africa Higher Education Centers of Excellence for Development (ACE) Impact Project (P169064) comprises of the following three components

- 1. Establishing new and scaling-up well-performing existing ACE centers for development impact**
 - 1.1. Support to establish new centers of excellence
 - 1.2. Support to scale-up well performing ACE I centers
- 2. Fostering regional partnerships and scholarships**
 - 2.1. Support to emerging centers (non-ACEs) for networking, regional technical assistance and improving learning environment
 - 2.2. Support for PhD scholarships through the PASET Regional Scholarship & Innovation Fund
- 3. Enhancing national and regional level project facilitation and M&E**
 - 3.1. Support for project facilitation and M&E at the regional level
 - 3.2. Support for national level coordination (Nigeria and The Gambia) by government designated national higher education agencies

Component 1. Establishing new and scaling-up well-performing existing ACE centers for development impact

Component 1 will aim to strengthen capacity in 23 ACE Centers and their host institutions (supply-side). **Sub-component 1.1** aims to support the establishment of 14 new ACE Impact centers and increase the number of quality centers and relevant programs offered in the region and to introduce new thematic areas that do not exist in ACE I Project. The construction of a new campus for the University of Science, Engineering and Technology (USET) The USET Campus at the Gambia College Campus in Brikama falls under this sub-component. **Sub-component 1.2** aims to provide additional funding and support to 9 existing ACEs (currently supported under ACE I) to enable them to scale-up their activities and deepen their development impact.

Component 2. Fostering regional partnerships and scholarships

Component 2 seeks to expand the regional impact of the ACEs funded under Component 1 by providing demand-side funding for partnering institutions and regional students to purchase training and consulting services from the ACEs that are most relevant to their teaching and research goals. **Sub-component 2.1** will support three emerging centers to develop regional institutional partnerships with ACEs (under Component 1) and other relevant international partners to strengthen the capacity of their higher education institutions. These Emerging centers will be in the form of a department/school or a multidisciplinary center within an institution. **Sub-component 2.2** will finance regional scholarships through the Partnership for Skills in Applied Sciences, Engineering and Technology and Regional Scholarship and Innovation Fund to support primarily the training of the next generation of faculty for higher education institutions in the region. This sub-component will build institutional capacity to support improvements in the quality and quantity of academic staff in the region's higher education institutions, ultimately increasing academic capacity of these institutions.

Component 3. Enhancing national and regional level project facilitation and M&E

Sub-component 3.1 will fund the Association of African Universities to continue as the Regional Facilitation Unit (RFU), to facilitate the ACE Impact I project's regional activities and support the centers under the project. Activities will include: M&E activities such as development of an online M&E database platform, verification of results, benchmarking of ACE host universities, and graduate tracer studies; site supervision visits of ACEs by independent experts; communications, safeguards support, capacity-building; and knowledge-sharing and networking among ACEs and governments. **Sub-component 3.2** will finance project implementation support at the national level, specifically in Nigeria, where the Second ACE Impact Project investment exceeds US\$25 million (17 ACEs) and in The Gambia, where the Emerging center needs additional support from a coordinating agency.

1.1 ESMP Objective

The objective of this ESMP is to assess and mitigate all potential negative environment and social (E&S) risks and impacts consistent with the Operational Policies 4.01 and 4.04 of the World Bank which were triggered for this project.

Specific objectives of the ESMP are: (a) Identify the roles and responsibilities of key Stakeholders; (b) Identify the eligible beneficiaries and persons affected; (c) assess the potential environmental and social risks and impacts of the Project and propose mitigation measures; (d) Identify the environmental social risks and impacts during implementation of activities and subprojects that contractors to need to address in their ESMPs; (e) specify appropriate roles and responsibilities of those tasked with monitoring the

implementation of the Project, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues, risks and impacts related to the activities; (f) identify the training and capacity building needed to successfully implement the provisions of the ESMP; (g) address mechanisms for public & stakeholder consultation and participation under COVID-19 and disclosure of project documents as well as create an accessible and inclusive system of addressing possible grievances; and (i) establish the budget requirements for implementation of the ESMP.

The ESMP will provide principles, specific processes and technical guidance to the Projects Coordination Unit, GTTI and the consultant to assess the environmental and social risks and impacts of the Project activities, including ensuring that individuals or groups who, because of their particular circumstances or conditions, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project. This ESMP will be applied to all activities (works, technical assistance, and research activities) to be financed by the Project and/or its subprojects. It must be complied with through the entire project cycle from design and implementation to attain the above outlined purpose and objectives. The ESMP will be a 'living' document and will be revised when necessary.

1.2 Description of Construction Activities at the Proposed University of Science, Engineering and Technology (USET) Campus

The ESMP has been developed for infrastructure development under the ACE Impact project on the proposed USET site at the Gambia College premises. The project may generally have limited environmental and social risks because the site is enclosed within the Gambia College premises. The scope of the developmental project is briefly explained as follows:

1. Construction of Academic and allied administrative buildings for the faculties of Civil Engineering, Mechanical Engineering and Electrical/Electronics to improve infrastructure and systems of higher learning for students, faculty, and staff etc.

Table 1-1 Description of Project Activities

Phase	Construction Activities
Pre- Construction Phase	Land clearing and preparation: bulldozing, excavating, and backfilling with earth; transportation and mixing of materials
Construction Phase	Foundation excavation and construction Erecting of Super-structures Complete Roofing of all the structures Electrical and Plumbing installations Fixing of doors and windows Wall and floor finishing

2. POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 The National Policy Framework

Policies

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

Table 2-1 Relevant National Policies

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

2.2 Acts and Regulations

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

Table 2-2 The Legal Framework Relevant to the Project

TITLE OF ACT OR REGULATIONS	DESCRIPTION	RELEVANCE TO THE PROJECT
Public Health Act, 1990	Protects public and environmental health including abatement of nuisances and any condition that may be injurious to health.	Relevant to Project since pollution risk can be associated with the Project.
National Environment Management Act, 1994	Principal legislation in environmental management; Part V of Act provides for certain projects listed.	This Project falls under Schedule B.
Environmental Quality Standards Regulations 1999	Regulations declare standards set out in Schedule 1 in respect of ambient air, saline waters, surface fresh waters and groundwater.	Project implementation has potential to generate to pollute communities.
Environmental Discharge (Permitting) Regulations 2001	Regulations require that a permit be obtained for most discharges of potentially polluting liquids into or onto the ground (i.e., to groundwater) or into surface waters (such as rivers or streams).	Project implementation has potential to discharge potentially polluting liquids into the Project Affected Area.
The Children’s Act 2005	Act sets out the rights and responsibilities of children and provides for their care, protection, and maintenance	Rights of children impacted by the project need to be protected.
Labor Act (2007)	Provides the legal framework for administration of labor, recruitment and hiring of labor, and protection of wages	The project hiring and management of its labor force should adhere to this framework
Anti-littering Regulations, 2007	Addresses waste management and pollution issues in relation to environmental health and hygiene	The project must ensure that all waste produced during all phases is well managed.
The Women’s Act 2010	Aims to advance women’s rights to promote their economic and social empowerment	Relevant to this project in view of potential impact on women; need for adherence to this act to avoid gender-based violence (GBV) and sexual exploitation and abuse/ harassment (SEA/SH) during the hiring process and Project implementation period.
Environmental Impact Assessment Regulations, 2014	The EIA Regulations elaborate on the requirements for EIA procedure, environmental impact statements, approval, environmental monitoring, etc.	The Regulations provide more details for the EIA of this project and implementation of its ESMP.

TITLE OF ACT OR REGULATIONS	DESCRIPTION	RELEVANCE TO THE PROJECT
Sexual Offences Act, 2013	Updates the law and procedures regarding the trial of rape, sexual offences, and related matters	This Act is relevant to the Project due to the need for protection of vulnerable persons within the Project sites against sexual offences, as defined in the Act

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

- UN Framework Convention on Climate Change (UNFCCC) 1994
- African Charter on Human and People’s Rights (ACHPR) (1983) and Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018
- Convention on the Rights of the Child (CRC), August 1990
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1993
- International Covenant on Economic, Social and Cultural Rights (ICESCR), 1976
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (CMW), 2017
- Convention on the Rights of Persons with Disabilities, 2009

Table 2-3 Relevant International Conventions Ratified by The Gambia

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
United Nations Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and the Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (OP-CEDAW)	Ratified 1993	Convention ensures the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men	The Convention highlights the right of women is central to their financial independence and may be critical to their ability to earn a livelihood and to provide adequate housing and nutrition for themselves and for their children; women should have access to benefits of this project as men
UN Framework Convention on Climate Change (UNFCCC) 1994	Ratified 1994	The ultimate objective of the Convention is to stabilize greenhouse gas concentrations "at a level that would prevent dangerous anthropogenic (human induced) interference with the climate system".	The project could potentially cause Air pollution on the site and the surrounding area from emissions which follow construction activities.
UN convention on the rights of the child, (UNICEF 1989)	Ratified 1990	The rights in the treaty include the right to education, the right to play, the right to health and the right to respect for privacy and family life	The project could potentially affect the right to health of the child through the generation of air pollution, poor waste management

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
Convention on the rights of persons with disabilities (CRPD) 2006	Ratified 2013	The Convention intends to protect the rights and dignity of people with disabilities; to promote, protect, and ensure the full enjoyment of human rights by people with disabilities	Persons with disabilities could potentially be impacted negatively by the project activities
Protocol to the African Charter on Human and Peoples Rights on the Rights of Persons with Disabilities in Africa, 2018 Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor	Ratified Jul 2001	The Protocol seeks to promote, protect, and ensure the full and equal enjoyment of all human and peoples, rights by all persons with disabilities. The convention aim is to protect children from treatment or activities which can be very harmful for their physical and mental health.	People with disabilities could be potentially impacted during project activities.
International Covenant on Economic, Social and Cultural Rights (ICESCR), 1976	Ratified 1978	The Convention aims to ensure the protection of economic, social and cultural rights including: the right to self-determination of all peoples; the right to non-discrimination based on race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status; the equal right of men and women to enjoy the rights in the ICESCR; the right to work; the right to form and join trade unions (article 8); the right to social security; protection and assistance to the family; the right to an adequate standard of living; the right to health; the right to education; and the right to cultural freedoms.	The project can potentially discriminate against workers in every aspect mentioned in the previous column and this can affect their overall development.
International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (CMW), 2017	Ratified Sept. 2018	The Convention is a global diplomatic deal to guarantee dignity and equality in an era of globalization.	Migrants are also eligible to work in the Project as long as they meet the labour requirements of The Gambia. As such, there is a potential for any of them to be discriminated upon based on the country of origin or refugee status.

2.4 Institutional Framework

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

- Ministry of Higher Education, Research, Science and Technology (MoHERST)
- PCU (MoBSE)
- Ministry of Health (MoH)
- Ministry of Gender, Children and Social Welfare (MoGCS)
- National Environment Agency (NEA)
- Ministry of Environment, Climate Change and Natural Resources (MECCNAR)
- Gambia Technical Training Institution (GTTI)

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

Table 2-4 Institutional Framework

Institutions	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
Ministry of Higher Education, Research Science and Technology	<p>Oversees Project Implementation of World Bank Policies and law of The Gambia.</p> <p>GTTI and MoHERST do not have a Projects Coordination Unit and so MoBSE PCU supports the implementation of both MoBSE and MoHERST Projects such as the ACE IMPACT Project under an agreement made between the authorities of both Ministries.</p> <p>On that note, the MoBSE PCU will support GTTI (the implementing Agency) in implementing this Project as the institution is under MoHERST.</p>	<p>Policy guidance</p> <p>Supervise GTTI management to implement the applicable Environmental and Social Safeguard Policies</p>	During the lifecycle of the Project
PCU (MoBSE)	Provides coordination support of the project implementation process.	Supports the development and implementation of the Safeguard Instruments. Support in the coordination of construction activities.	During the lifecycle of the Project

Institutions	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
		Ensure that they are in line with World Bank's Safeguard Policies	
Gambia Technical Training Institution	Coordinate the project implementation	<p>Coordinate all construction activities in the project.</p> <p>Work with the Safeguard Team at PCU, to implement the ESMP of the project.</p>	During the lifecycle of the Project
National Environment Agency (NEA)	The NEA enforces the NEMA, 1994 and EIA Regulations 2014	<p>Evaluation of the ESMP report</p> <p>Grant Environmental Approval for the Project</p> <p>Monitoring the ESMP implementation</p>	During the lifecycle of the Project
Ministry of Environment, Climate Change and Natural Resources	Oversees the NEA and implementation of environmental laws and policies of The Gambia	<p>Policy guidance</p> <p>Oversees the NEA Management that is key to this Project</p>	During the lifecycle of the Project
Office of the Governor West Coast Region (WCR)	Oversee the Regional Technical Advisory Committee (TAC) for region 2.	The TAC will support the implementation and monitoring processes of the Project at Regional levels	During the lifecycle of the Project
Ministry of Health	Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development	<p>Providing guidance on transmissible diseases to consider during sensitization.</p> <p>Promoting safe and healthy environments at project sites, including response to incidents of GBV or VAC during construction (Occupational Health and Safety).</p> <p>In response to GBV or VAC, there are one-stop Centers under the Ministry of Health. These are where survivors are referred to for social and psychological therapy</p> <p>Responding to accidents</p>	During the lifecycle of the Project

Institutions	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
Women's Bureau	Under the Ministry of Gender, Children and Social Welfare, the Women's Bureau specifically promotes gender equity and women's empowerment in The Gambia.	Ensures women's rights affected by the Project are protected. Participates in sensitization on gender issues, including, prevention and response to GBV, VAC, SEA/SH, etc.	During the lifecycle of the Project
Department of Social Welfare	This government department protects and promotes the rights of vulnerable people such as children, women and the disabled.	Supports and guides the process during cases of grievance. Participates in sensitization on prevention and response to GBV, SEA/SH, VAC etc.	During the lifecycle of the Project

2.5 World Bank Safeguards Policies

The World Bank Environmental and Social Safeguards Guidelines and Operational Policies enable the integration of environmental and social considerations into the development, planning and execution of development projects.

These policies are designed to: (i) protect the environment and society from the potential negative effects of projects, plans, programs, and policies; (ii) reduce and manage the risks associated with implementation of project activities; and (iii) assist in better decision-making to ensure sustainability of activities.

The ACE Impact project is classified as "category B" because its adverse effects on the population or areas of environmental importance are limited, site-specific, and likely reversible, and mitigation measures can be more easily designed / implemented. There are three triggered World Bank environmental and social safeguard policies under the ACE Impact Project: OP/BP 4.01 Environmental Assessment, which covers impacts on the environment, human health and safety, physical cultural resources, and global trans boundary and environmental issues, OP/BP 4.04 (Natural Habitats) and OP/BP 4.11 (Cultural Physical Resources).

OP 4.01 is triggered because the Project is likely to have environmental and social risks and impacts on its area of influence. This policy requires that environmental and social consequences be identified early in the project cycle and considered in the selection, location, planning, and design of the project to minimize, prevent, reduce, or compensate for adverse impacts and thereby maximize positive impacts and include processes for mitigation and management of environmental and social impacts during the project cycle.

OP 4.04 (Natural Habitats) is triggered in the ACE Impact Project because the subproject site is located near a forest. This policy stressed on the need for conservation of natural habitats and require other measures that protect and enhance the environment, is essential for long-term sustainable development. It therefore supports the protection, maintenance, and rehabilitation of natural habitats and their functions in its economic and sector work, project financing, and policy dialogue.

OP/BP 4.11 Cultural Physical Resources, which provides cultural heritage guidelines to avoid or mitigate adverse impacts of development projects. This policy applies to the following projects: (i) any project involving major excavation, demolition, earthworks, flooding or other environmental modifications; (ii) any project located on or near a site recognized as cultural property; (iii) any project designed to support the management or conservation of physical cultural property. As part of the ACE Impact Project, this will also concern buildings of historical value, and which would be the subject of rehabilitation works.

3. ENVIRONMENTAL AND SOCIAL BASELINE

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

3.1 The Physical Environment

i. Climatic Conditions

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

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

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

At Yundum (which is about 8km from Brikama where the site is located), the average annual rainfall is about 50 inches (1,300 mm) and the mean monthly temperature tends to be in the upper 70s F (mid-20s C).

ii. Soil Conditions

The soil characteristics around the site contains mostly alluvial and colluvial soils. Most of the alluvial soils are hydromorphic and fine textured usually comprising more than 80% silt plus clay throughout.

3.2. The Biological Environment

The Gambia College is surrounded by the Nyambai (202ha) and Kabafita (243ha) Forest Parks which are reserved for preservation and to maintain forest resources capable of protecting natural ecosystems. There is no presence of significant plant (few shrubs on site) and animal species at the site.

3.3 The Socio-Economic Baseline

The population figures for Brikama are rapidly growing due to the pattern of migration (rural - urban), where people migrate to urban areas in search of jobs. The rapid increase in urban population has brought with it several environmental and socio-economic problems including deforestation, soil erosion, pollution, waste generation, and stress on health, education, and employment services. The protected forests in Brikama have survived the expansion of agricultural land and the use of trees for fuel. Decrease in rainfall over the last 30 years has increased the rate of desertification in the area. Gender disparities and inequalities in access to education and employment are among the fundamental causes of poverty in Brikama.

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

High population in the urban area increases the level of poverty as there would be strain of the existing water supply, environmental sanitation and poor waste disposal. The Gambia's hub of key economic activities that includes tourism, trade, and government administration, the poverty rate was about 17 percent. In other urban areas—scattered across the country, but mostly concentrated in the Brikama LGA where the poverty rate, at 41 percent, was more than twice as high.

The land on which the University is to be built belongs to the Brikama College and there is no formal or informal use whatsoever currently. Brikama College is subleasing the land to GTTI who is the implementing agency of the Project. Both Brikama College and USET are under the Ministry of Higher Education.

During Project implementation, materials to be delivered on site are likely to pass through Kembujeh, Jambangjelly and Jalambang and with an effective delivery plan (type of vehicle and time of delivery etc.), less or no negative impact to these communities is envisaged. The overwhelming majority of the population are Muslims.

i. Youth

The 2015 National Youth Policy (2015) which defines youth 'as all young males and females aged 15–35 years, who are citizens of The Republic of The Gambia.' The youth population is estimated 36.7 per cent of the total population; females represent 38.5 per cent and males 34.8 per cent. Banjul, Kanifing and Brikama have higher youthful population than the national average in 2013 census which means that youth are more concentrated in urban areas as opposed to rural areas. The census also showed that the proportion of female youth is higher than the male in all the Local Governments Areas (LGAs). Due to lack of employment for youth, there are a number of youth who are resorting to being smuggled overseas particularly to Europe in often precarious conditions which have sometimes resulted in death during migration. This project can assist in providing youth necessary skills development and training and ultimately employment opportunities.

ii. Gender

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

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

In 2020, The Gambia was ranked 172 out of 189 countries with a score of 0.496, according to the UNDP Human Development Report's Index ranking. According to the Gender Inequality Index¹ (GII), 2019,

¹ The Gender Inequality Index (GII) reflects women's disadvantage in three dimensions—reproductive health, empowerment, and the labor market—for as many countries as data of reasonable quality allow. The index shows the loss in human

Gambia was ranked 148th with a value of 0.612; poverty of women is closely linked with very low literacy levels (32 percent for women and 44 percent for men) and education attainment rates for a variety of reasons, including restrictive cultural norms and challenges in physical access to school.

Women and girls in The Gambia likewise experience violence at high levels. For example, women and girls marry very young in The Gambia, with nearly a quarter (24%) of females aged 15-19 already married; three out of four women aged 15-49 have likewise undergone female genital mutilation. In addition, one out of four (26%) ever-married women has experienced physical, sexual, or emotional abuse from an intimate partner.² Women, especially in rural areas, also play a limited part in decision-making in the family and in how the family income is spent. This low participation in decision-making processes in the household extends to the political sphere.

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

iv. **Gender-Based Violence (GBV)**

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development due to inequality between female and male achievements in these dimensions. It ranges from 0, which indicates that women and men fare equally, to 1, which indicates that women fare as poorly as possible in all measured dimensions.

² Demographic and Health Survey, 2013.

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v. Violence Against Children (VAC)

Violence Against Children (VAC) is defined as physical, sexual, emotional and/or psychological harm, neglect, or negligent treatment of minor children (i.e., under the age of 18), including exposure to such harm,³ that results in actual or potential harm to the child’s health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power. This includes using children for profit, labor⁴, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography. In The Gambia, for instance, there have been reports of children, mostly girls, subjected to domestic service and commercial forms of exploitation (i.e., tourism).⁵ Boys in urban areas are known to work as taxi or bus attendants whilst girls work as street vendors, selling food items such as candy, water, food, or fruits for their parents.

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

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

In this regard, the Project Coordination Unit (PCU) and Contractors must ensure that no aspect of Project works involve children under the minimum age of 16 for light work (as per *The Children’s Act, 2005*), and none under the age of 18 for hazardous work and work that affects their schooling and social or moral development.

³ Exposure to GBV can also be considered VAC where there is a gender bias and/or the act is of a sexual nature, such as SEA, which is a form of GBV and can be experienced by both girls and boys.

⁴ The employment of children must comply with all relevant national legislation, including labor laws in relation to child labor and the World Bank’s policies on child labor and minimum age. They must also be able to meet the Project’s Occupational Health and Safety competency standards.

⁵ See note 5.

The Labor Act, 2007, prohibits children under 18 from engaging in agricultural, industrial, or non-industrial work for economic gains. In addition, to strengthen and protect children against possible violence and exploitation, Project code of conduct, Action Plan for Implementing ESHS and OHS Standards, as well as the SEA/SH Prevention and Response Action Plan must be rigorously applied and monitored for compliance (See sub-annex A & B of Annex 3) . These codes of conduct will be included in the Contractor’s ESMP.

vi. Disadvantaged and Vulnerable Groups

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

vii. Education: Access and Equity

A recently concluded tracer study on Gambian graduates indicates that there is a high employment rate (≈100%) associated with the professional programs, as opposed to a high unemployment rate (14% - 23% in 2008 and 32% - 68% in 2010) for the Technical and Vocational Education and Training programs. The study also suggests that a high proportion of those employed from the professional programs are in the public sector/parastatals (46% - 100%), whereas a high proportion of TVET graduates are employed in the private sector/family businesses (52% - 82%).

Although universal primary completion has not been achieved, gender parity of girls has been met at all levels of education. The “traditional” gender disparities have been eliminated from ECD to senior secondary schools; however, the post-secondary education level is still lagging at 69 percent in 2015. Although there was a slight increase of 1.5 percent between 2010 and 2015. Inadequate access to post-secondary education is caused by several factors. It is either due to lack of enough educational facilities (weak teaching skills and lack of infrastructure plus materials), poverty (or lack of interest) or restrictive cultural norms whereby due to illiteracy, parents believe it is best to marry off their daughters to avoid them getting pregnant out of wedlock. There is also mismatch and the capacity gaps specific to science, technology, engineering, and entrepreneurship. The constraints around these disciplines weigh heavily on the nation’s ability to curb youth unemployment and underemployment.

viii. Health Sector and COVID-19

The health system continues to be under great pressure due to a number of factors, which include limited budgetary allocation, equipment and Human Resource. Brikama has one health Center which is about 10 minutes’ drive from the site. The health Center is open and accessible to all at any point in time, so should workers have any issue related to OHS or accidents, they will be attended to upon arrival at the center.

COVID Cases in The Gambia

The COVID-19 global pandemic has impacted the Gambia and led to government responses such as declaring public state of emergencies to put in place physical distancing, business closures and other measures in line with WHO guidelines. The last state of emergency expired 17 September 2020, ending the nightly curfew and allowing all businesses and markets to resume normal business hours. Currently, the population have been advised to follow the WHO and Ministry of Health’s guidelines (avoid being in a crowded area and wear masks when going out, wash hands frequently and observe social distance). Vaccination efforts have been ongoing, and there is limited access to and uptake of vaccines as of 31 October 2021 (see Table 3-3) around two percent of eligible Gambians have been fully vaccinated.

Table 3-1 COVID 19 Cases as of 31 October 2021

Country	Active cases	New cases registered	Total Confirmed cases	Cumulative number of recoveries	Total Deaths
The Gambia	14	6	9, 973	9, 618	341
Senegal	16	3	73, 920	72, 025	1, 878

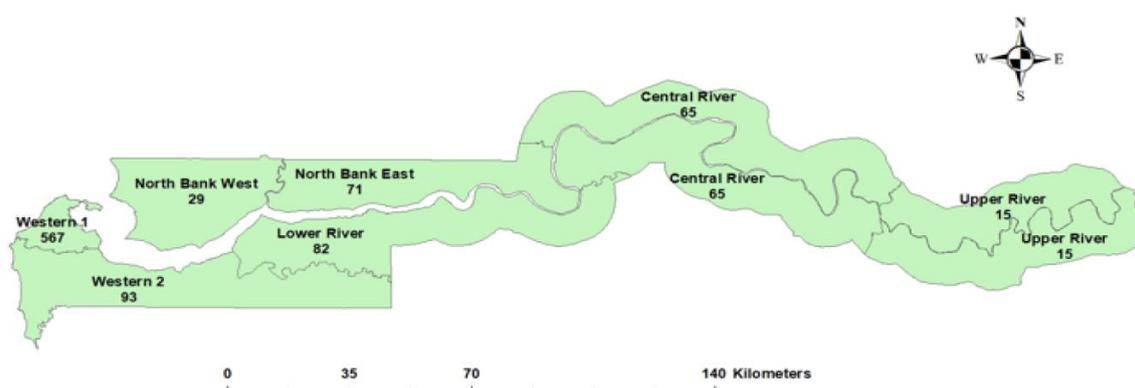
Table 3-2 Vaccination Data in the Gambia as of 31 October 2021

Country	Received First Dose	Fully Vaccinated	Number of people eligible for vaccination	Percentage of eligible population fully vaccinated
The Gambia	40,418	216, 356	1,233,944	2%
Senegal	0	1,292 494	8,792,559	1.5%

Sources: 345th National Situation report on COVID 19 as of 31st October 2021: Ministry of Health Pandemie Covid-19 / Senegal Communiqué 610 : Ministère de la Santé et de l'Action sociale

All regions have reported cases of COVID 19 as indicated in Figure 3.1 with about 9% of the confirmed cases (93/1002) in the western region 2, notably Brikama area which is where project activities are taking place.

Figure 3.1 Distribution of COVID 19 confirmed cases in The Gambia by 22 July 2021



Source: COVID-19 National Situation Report #345 | 22nd July 2021

In terms of age and sex distribution, about 59% of the confirmed cases are male while 60% of the confirmed cases are below 58.6% years old. However, the age category 20 years and less have a few more female cases than males (COVID-19 National Situation Report #345 | 22nd July 2021)

Presently, the main challenges related to addressing COVID-19 according to the Ministry of Health are:

- a) Community Based Surveillance (CBS) activities not translating to increase in the number of daily tests being conducted.
- b) Support for innovative countrywide risk communication strategies and activities on COVID-19 is suboptimal.
- c) Security lapses at some of the treatment centers resulting in the abscondence of patients.
- d) Dwindling compliance with mask-wearing requirements.
- e) Low turn-out at COVID-19 sample collection sites resulting in fewer number of daily tests.
- f) Denial, misinformation, stigma, and discrimination against COVID-19 affected families.
- g) Weak and unreliable internet connection at the National Public Health Laboratory is hampering the implementation of e-surveillance at the laboratory.

4. PUBLIC CONSULTATION

This chapter presents the approach that was taken to conduct stakeholder consultations in the process of developing the ESMP. It describes the process through which the stakeholders, among other things, shared local information with the consultant and Safeguards Team.

Since COVID-19 requires social distancing and measures in place to prevent transmission, large assemblies are not encouraged which is why consultations were limited to consulting with heads of institutions and individuals within the communities. Consultation will continue with project affected communities during the implementation of the Project.

4.1 Overview

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

A review of the ESMF prepared by the Association of African Universities (AAU) was conducted by the Safeguard Team at MoBSE, PCU in June 2021. The team called for a multi-stakeholder consultation meeting to engage all stakeholders in order to get their opinion on the ESMP. After the presentation, the safeguard team reviewed participants on the background, intended scope and process for ESMP, the floor was opened for participants' comments and recommendation.

4.2 Objectives of consultation

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

- i. discuss the Project with potential beneficiaries, highlighting its components and the potential positive and negative impacts, and the proposed mitigation measures that will be put in place;
- ii. facilitate transparency and inclusive participation of community members in the project so they can voice their concerns and views regarding the project design and its project impacts, and to ask questions;
- iii. highlight the potential roles and responsibilities of community members, during both the project design and implementation; this is important especially in the context of community-level monitoring of ESMP implementation, which is one way to enhance their participation and promote sustainability in the project.

4.3 Methodological Approach

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

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

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

A precautionary approach will be taken for the consultation process and civil works implementation to prevent infection and transmission, given the highly infectious nature of COVID-19 (**See Annex 1 for the COVID-19 Protocol**). The following are some considerations for selecting channels of communication during project implementation the current COVID-19 pandemic:

- Avoid public gatherings (considering national restrictions or advisories), including public hearings, workshops, community meetings, and in working sites.
- As smaller meetings are permitted (up to five people with distance of 1.5m distance between participants), consultations will be conducted in small-group sessions, such as focus group meetings. Efforts will be made to conduct meetings through telephone or, if possible, online, channels to reduce risk of contagion or contamination.
- Employ channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Communication channels can also be highly effective in conveying relevant information to stakeholders and allow them to provide their feedback and suggestions.
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, online platforms, dedicated phone lines with knowledgeable operators.
- Each of the proposed channels of engagement will clearly specify to PAPs how feedback and suggestions can be provided by stakeholders.

In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below:

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

The following representatives from institutions were consulted:

- GTTI
- National Environment Agency (NEA)
- Ministry of Higher Education Research Science & Technology (MoHERST)
- Department of Forestry
- PCU (MoBSE)
- Ministry of Gender, Children and Social Welfare (MoGCS)
- West Coast Region Governor
- NAWEC
- Ministry of Health (MoH)
- Brikama Area Council (BAC)
- The Gambia Fire and Rescue Services

- Gambia College
- The Gambia College Students Union

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

- the risk of spread of COVID-19 and other communicable diseases
- workplace accidents (of workers and others on/near the premises where activities are taking place)
- the risks involved in having workers⁶ on the Gambia College premises where thousands of female students are hosted (GBV, SEA/SH, etc.)
- the need for protection of the environment (especially the nearby Nyambai and Kabafita Forests),
- the risk of bursting NAWEC's main underground pipes in the area or cutting of overhead transmissions lines during the works.

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

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

4.4 Feedback from Stakeholders

Observations/ Comments Made During the initial Stakeholder Consultation. The list of representatives consulted is in Annex 6.

- The need to present a draft report to the steering committee for their observation before the final document.
- Review of the document from all relevant stakeholders
- Recommendation for collaboration in the form of Public Private Partnership
- Timeline for the implementation Schedule of ESMP

⁶ They will not go through any nearby communities as the entrance of the Brikama College is on the highway. They are staying in their homes since the site is located in the urban area where they live, so commuting won't be an issue. Also, the site is located in an area which is highly populated with young adults, most of which are ladies. To minimize or avoid the prevalence of SEA/SH, it is not advised to have a temporary accommodation for workers.

Stakeholders	Stakeholders' Comments	Recommendations of Stakeholders to the Project	Actions Project will Implement
National Environment Agency	-An environmental and social impact study needs to be conducted.	-Respect the scoping and screening procedure before starting an environmental impact study -An environmental monitoring mechanism must be established by the Safeguards Team and the capacities of the monitoring stakeholders must be established.	<ul style="list-style-type: none"> • Scoping and Screening procedure was done with the NEA before the ESMP was developed. • A monitoring mechanism was established by the Safeguards Team. See Chapter 8 for details.
Ministry of Higher Education Research Science & Technology (MoHERST)	<p>- The Ministry's main objective is to create jobs for young people especially upon completion of training at reputable institutions. Hence the need to improve on the quality of higher education through infrastructure and learning materials.</p> <p>-Under the ACE Impact Project, GTTI has currently partnered with Kwame Nkrumah University in Ghana and Dermont University in the UK who is looking to introduce a strong entrepreneurial Course which will be beneficial. At some point, a partnership between the university and Industries will also be developed.</p>	-Consider meeting with the ACE Focal Point at the Ministry and also collaborate with them during Project Implementation period.	<ul style="list-style-type: none"> • Meetings between the Safeguards Team and the ACE Focal Point, Permanent Secretary and the Principal Science & Technology Officer were conducted to gather information on the project which were used to develop the ESMP. The collaboration will continue during Project Implementation.
Gambia Technical Training Institute (GTTI)	<p>- They currently do not have any focal point responsible for handling SEA/SH complaints and this is very important since the school is engaged in co-ed adult learning.</p> <p>-For a sustainable mode of Construction during the implementation of the Project, the institute has come up with a much more reasonable way of using cement in the Project by making compressed earth blocks which use minimal amount of cement and earth compared to the conventional concrete blocks.</p>	<p>-The GTTI team expressed the need to be trained on the ESMP and GM when completed as they look forward to having their own safeguards team in future as an academic center of excellence.</p> <p>-GTTI stated that they need to have their own social focal point who will be responsible for processing SEA/SH related complaints.</p>	<ul style="list-style-type: none"> • The GTTI team will be trained on the specifics of the ESMP and GM once approved for use by the World Bank. • GTTI have already employed Environmental & Social Focal Points who will be attached to the PCU Safeguards Team for mentoring.
Gambia College	<p>Issues of concern are:</p> <ul style="list-style-type: none"> • Economic influence on the students and risk of exploitation by the workers as most students are from disadvantaged backgrounds. • Distraction of academic activities due to noise from construction activities. 	<ul style="list-style-type: none"> • The workers should be well trained on the labour laws of the Gambia etc. • Students should be adequately sensitized on SEA/SH and VAC and trained on the GM and how to report harassment, exploitation etc. 	<ul style="list-style-type: none"> • The workers will be trained on the labour laws of the Gambia, Occupational health and Safety and GM (how to report harassment, exploitation, etc).

	<ul style="list-style-type: none"> Noise and dust pollution 		<ul style="list-style-type: none"> Sensitizations will be held for the students on SEA/SH, prohibited behaviours and also trained on the GM (reporting procedures on SEA/SH incidents). Create female-friendly work environments with safe discussion space centered on right-based approach for social inclusion.
Department of Forestry	<p>-Issues of concern mentioned are:</p> <ul style="list-style-type: none"> Waste dumping in the nearby Nyambai Forest. Forest intrusion (resulting to people cutting trees for firewood or shed or even collecting food meant for biodiversity to go and sell). Students might use the forest as a camping venue. Possibility of bush fires set by people. Possibility of people using the forest as a shorter route to access nearby communities. 	<p>- Conducting intensive sensitization of the workers on the ground and all beneficiaries on environmental protection especially when it comes to waste management and illegal intrusion.</p> <p>- Restoration of degraded areas linked to the project to be conducted at the end of the works.</p>	<ul style="list-style-type: none"> During project implementation, there will be ongoing sensitization of workers on the environment and its protection. This includes the prohibition of waste disposal especially in the nearby forest and illegal intrusion. There will be an inclusion in the Civil Works Contract requiring degraded areas during construction to be restored at the end of the works.
West Coast Region Governor Office	<p>-Any project that is part of the improvement of the living conditions of the population is welcome and has the full support of the administrative authorities</p> <p>- The news of a technical University is well appreciated as the Gambia has always concentrated on the academic aspect of learning and not the vocational aspect, so this is a huge step in development. It will transform the Education Sector for youth.</p>	<p>- GTTI should get a sub-lease document for the proposed land.</p>	<ul style="list-style-type: none"> GTTI's lawyer is currently working on obtaining the sub-lease document. Once received, this will be attached to this ESMP in Annex 5.

<p>Ministry of Gender, Children and Social Welfare</p>	<ul style="list-style-type: none"> - Child labour, child exploitation, sexual violence (workers may engage young girls into sexual activities) as areas of concern. - Women can be exploited sexually and financially since they can work at the site or be drawn to offer services to workers which are usually verbal. 	<ul style="list-style-type: none"> - Hold sensitizations at community level so parents will keep children away from the site. 	<ul style="list-style-type: none"> • There will be routine trainings for workers on Codes of Conduct and expected behaviors and sanctions; training on relevant laws on this including child labor, sexual exploitation, GBV, etc. • Communities will also be sensitized on child labour, child exploitation, SEA/SH and the GM (including how to report grievances).
<p>NAWEC</p>	<ul style="list-style-type: none"> - There is a risk of bursting pipes or touching overhead lines if the safety distances are not respected as these are story buildings and if care is not taken, the reinforcement rods can touch the lines which is very fatal. - NAWEC has 2 huge pipelines (500 & 400 respectively) running parallel and Power Transmission lines in the area. 	<ul style="list-style-type: none"> - A joint site visit to be conducted with NAWEC staff, the PCU (MoBSE) safeguards team and Contractor to make onsite assessment of the proposed buildings with regards to the location of their pipes and lines for the sake of safety and to avoid damage. 	<ul style="list-style-type: none"> • Prior to the start of the works, a joint site visit with the Consultant and Contractor will be conducted to make onsite assessment of the drawings with regards to implementation and apply adjustments if necessary.
<p>Ministry of Health</p>	<p>Some of the concerns mentioned are:</p> <ul style="list-style-type: none"> • The need to prevent COVID-19 transmission and infection of project workers, community, students/teachers/other school workers. It is important that health guidelines are followed which include wearing personal protection equipment such masks, practicing hygiene protocols and social distancing as cases are surging in Africa. • Labor – Protection of students. Contractor should make sure that workers follow the labor laws. • Occupational health and Safety – Workers’ health and safety is important including the environment. 	<ul style="list-style-type: none"> -Waste Management Plan should be put in place to make sure waste is properly disposed of. -Mitigation measures like sensitization of the adolescents in the community and students are essential. 	<ul style="list-style-type: none"> • A Waste Management Plan will be put in place prior to the start of the Civil works. • Sensitization of workers on covid protocols; contractor to make available PPE, signage about COVID and PPE and informing school workers/teachers/students of presence of outside workers and need to practice social distancing.

- Sexual exploitation might be an issue especially with the use of power influence. This can bring about sexually transmitted diseases.

- Training of workers on Codes of Conduct and sanctions.
- Informing community/students/teachers of GM and how to report SEA/SH

Table 4-1 Summary of consultation with wider group of Stakeholders

The list of representatives consulted is in Annex 4.

5. ANALYSIS OF ALTERNATIVES

5.1 Choice of the site of the Project

Initially, the site chosen was the located around the Farato farm in Farato, West Coast Region. The Project then realized that there will be a lot of economic displacement, especially women who were earning their livelihood from the farm, even though the land belongs to the State. To avoid socioeconomic impacts which can heavily impact on people's source of income, especially vulnerable groups, the Project decided to use the land within the Brikama College which is not used for any livelihoods or other activities (formally or informally). In that way, the Project will avoid land dispute issues and avoids economic and physical displacement.

Map of the USET site at the Gambia College, Brikama



Pictures of the site taken on 22nd May 2021



Choice of design options for the building of the campus

The Project has decided to use more of locally sourced gravel remnants and little cement and water during construction to reduce its footprint on the environment and at the same time reduce its carbon footprint. Remnants from sieved gravel pebbles are mixed with minimal amount of cement and water. This is further filled and compressed in specially fabricated moulds whilst using manual strength to exert load on the mould to achieve the compacted block profile. The gravel remnants are usually bought from Gravel sellers who are licensed to sell gravel in the country and so there is no environmental and social impact.

5.2 The “No Project” Alternative

Under a “No Project” alternative scenario, the adverse environmental and social impacts from the Project will not occur, but at the same time the potential Project’s benefits will not accrue to the communities. For example, without the USET, well trained engineers locally will not improve the success level of Gambian youth since they will not be able to develop skills on trade and business opportunities that rely on engineering skills and knowledge.

Without this Project, the Government of The Gambia will continue to give scholarships to high school graduates to study abroad at high costs. The country’s ability to train youth in country with skills applicable and their country will be more efficient, beneficial to both the Gambia and the student.

The benefits of this Project will enhance the socio-economic development of the country and access to high quality of education. There will be improvement of livelihoods and enhancement of social

development nationally with the production of well-trained engineers who will bring mature skills to the management of areas like electrical engineering, computer science etc. Having a new building is essential as there are inadequate facilities to undertake such studies in the country. That is the main reason why students go abroad for studies. To fill this demand for higher education courses in Engineering especially, the structures (buildings) are required.

In conclusion, given the potential impacts posed by the Project within the proposed sites, the positive and negative risks will be assessed in the subsequent chapters after which relevant recommendations will be made to address the impacts.

6. ENVIRONMENTAL & SOCIAL RISKS/IMPACTS AND MITIGATION MEASURES

Environmental & Social risks and Impacts

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

6.1 Methodological Approach

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

Potential impacts, either positive or negative, are the likely changes to occur on the environmental and social components because of Project implementation. Sources of these impacts include all project-related activity, carried out during any of the different phases of implementation, which generate these changes (Table 6-3). Table 6.1 identifies the environmental and social components likely to be affected whilst Table 6.2 lists the major potential risks and impacts for the ACE Impact Project.

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

COMPONENTS AFFECTED		
Physical	Biological	Human
<ul style="list-style-type: none"> Noise Air quality Soils Water 	<ul style="list-style-type: none"> Vegetation & Wildlife 	<ul style="list-style-type: none"> Public and workers' health and safety Labor-related issues Vulnerable groups (People with disabilities, women-headed households, young and old people etc.

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

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

Environmental Risks and impacts	Social Risks and impacts
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<ul style="list-style-type: none"> • Loss of vegetation and trees, soil erosion or contamination, interruption of natural waterways or drainage systems or the destruction of natural habitats for various fauna, and destruction of protected sites prior to construction. • Generation of all manner of solid and liquid wastes. • Noise and Vibration during civil works. • Possible need of water from the College for construction leading to a limitation of the resource. • Degradation of the living environment and the natural environment with the restoration of the sites to their previous condition in respect to vegetation cover, protection by fences from unwanted encroachment and construction debris. • Air Quality Deterioration (Dust Pollution) • Water Pollution and Contamination including damages to major underground water pipelines and Overhead Power transmission lines. • Waste dumping or bush fire in the nearby Nyambai Forest. • Damage to infrastructure and public utilities. 	<ul style="list-style-type: none"> • Grievances between the workers and the school Community due to lack of social inclusion. • Violence Against Children (VAC). • SEA/SH from workers coming from outside the college. • Illegal intrusion in the nearby Nyambai Forest. • Discrimination in the recruitment of workers. • Access to the University and education for vulnerable groups. • Risks of non-payment for services rendered by workers to the contractor. • Risks of child labor when children below the minimum age for employment are used as temporary replacements for workers. • Potential risks related to work accidents or communicable diseases with the workers or community who will be recruited including the transmission of COVID-19, as this project is taking place during the global pandemic.
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6.2 Evaluating the Significance of Potential Impacts

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

Nature of an Impact

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

Types of Impacts

- **Direct or primary impacts** are those impacts that are created due to changes to the immediate environmental and social component by the Project activities. There is clear causative link between the activity and the component.
- **Indirect impacts** are usually secondary in the sense that the correlation between the activity and the environmental and social component are not readily noticeable and may not necessarily be on the same site. For example, construction works will attract workers who may interact with the women and girls in the community, and this may lead to spread of sexually transmitted diseases, gender-based violence, sexual harassment or sexual exploitation and abuse which can affect community health and stability.
- **Cumulative impacts** can be defined as changes to the physical environment and social environment caused by the combined impact of past, present, and future human activities and natural processes. The potential cumulative impacts of this Project are very low, nonetheless, they are also analyzed as the Project may exacerbate effects as a result of a combination of issues from activities of the past, present or future, including natural phenomena. The distribution of such impacts may be only local on this type of Project. For example, excavation activities might burst some of NAWEC's pipes or works (involve storey-buildings) can interfere with overhead power lines which can all affect the water and electricity distribution in the both the Greater Banjul Area and West Coast Region as these are main distribution lines supplying both areas.

6.3 Evaluation of Impact Severity / Significance

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

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

6.4 Positive Environmental and Social Impacts

Overall, the ACE Impact Project is likely to have a positive impact on the socio-economic development of The Gambia and in access to education for graduates from High School and matured adults in need of vocational training. Some of the positive impacts include:

- Construction of water and sanitation facilities would create improved disposal of human waste and improved hygiene which could reduce the transmission of water related diseases such as diarrhea. This development would positively impact on the administration and student community.
- Availability of water and toilets will help in the mitigation of COVID-19 risk. Improved sanitation facilities for students.
- Temporary employment during works and operation with its associated social benefits such as better living standards (around 20 people per building; there will be 3 buildings/faculties on site, 14 of them will be unskilled workers).
- Increased access of temporary income generation opportunities for women through petty trading targeting Project workers.

- Improved education service delivery thanks to better curriculum and improvement of educational facilities.
- Improved access to education to students especially girls who are always encouraged to venture into technical courses of study.
- Improved sanitation facilities for students.
- Improved curriculum and Lecturer training for better education quality, and better future for the students.

6.5 Negative Environmental and Social impacts and Mitigation Measures

A summary of the major negative environmental and social impacts of the construction component is provided in Table 6.3 below. These negative impacts can arise before, during and after construction. The environmental and social screening conducted ensures that the potential negative impacts are identified, and appropriate mitigation measures instituted as recommended in the table.

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

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

Direct impacts on ecosystem services, such as forests, may occur. Other risks include OHS and community health and safety related to possible COVID-19 transmission, sexually transmitted diseases, and accidents at work. The mitigation measures contained herein must also be reflected in the C-ESMP, including sensitization measures for works on proper PPE use, the availability of PPE by the contractor, training on the Codes of Conduct, among other measures. The Project has also developed a protocol to mitigate the risk of COVID-19 transmission during consultation and civil works (see Annex 1).

After the construction and while not directly related to construction activities, there may be residual risks related to SEA/SH within the broader project in the Gambia College setting related to power imbalances between teacher and students such as trading sex for grades or sexual harassment between Lecturers and students. The Project must work on mitigating those risks in the College environment and the measures developed for construction will be useful beyond construction completion.

A: Physical Environment: Potential negative impacts and mitigation measures

i) Air quality impacts

During land clearing and all construction activities, excavations and handling of earth materials will create dust pollution. The likely nuisance will be confined to the site locality and of short-term nature.

Mitigation

Access to construction sites must be controlled, particularly since the site is located in a built-up area, and the students and staff living in the College premises given long notice before works to ensure sites are cleared. Construction materials must also be dispensed at strategic locations away from the school community activities. It will also be necessary to:

- Sensitization of the staff and students at the Gambia College.
- Monitoring the wearing of protective equipment and awareness campaigns.
- Regularly maintain equipment and construction machinery.
- Wearing dust masks for site personnel
- Watering the platforms on a regular basis

ii) Geology and Soils

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

Mitigation

- Contractors must be cautioned through the clauses in their contracts to use only certified sand and gravel suppliers that have been approved by the NEA and Geology Department.
- To avoid exploitation of local materials, where possible, sand, basalt and gravel may be purchased externally.
- Regular maintenance of vehicles and machinery being used during the works.

iii) Improper waste management

The possibility of soil disturbance during excavation for foundation of structures may result or contribute to localized soil erosion based on the topography of the area. Improper waste management of PPE disposal and other hygiene materials (gloves, masks, goggles, reflectors etc.) can cause contamination.

During construction in the short-term, solid wastes, unused construction materials, packaging material are usually abandoned around sites creating eyesore and health risks.

Mitigation

All excess materials and waste produced in the process must be collected and the surrounding land returned to its original state. Some waste materials such as packaging and rubble may have other uses and shall be given to workers or members of the community for reuse. Unwanted waste should be disposed of safely.

All waste produced from the Project activities must be well managed to prevent indiscriminate dumping and cause for scavenging by communities. For the management of used oils, waterproofed

areas will have to be set up within the fixed site installations to receive sealed bottoms for the storage of used oils. Quantities of stored oil should be collected at regular intervals and routed to treatment companies licensed by the National Environment Agency.

iv) Noise

Noise is inevitable from the use of trucks to transport materials and the use of equipment during construction activities. Workers are generally those who are primarily impacted, as well as households or campus residents close to the site.

Mitigation

Contractors must be cautioned through the clauses in their contracts to work only during the day (8am – 6pm) to minimize the distraction especially at night when staff and students residing at the College Campus need to sleep or study at some point. Workers will also be provided with adequate PPE including ear covers when necessary.

v) Surface Water

There is a high probability that NAWEC water pipes around the area might get burst during the foundation excavations.

Mitigation

NAWEC will conduct a joint site visit with the Safeguards team, Consultant and Contractor to make an onsite assessment of the proposed buildings with regards to the location of their water pipes and electrical lines for the sake of safety and damage.

B: Biological Environment: Potential Negative Impacts and Mitigation Measures

i) Negative Impacts on Vegetation and Wildlife

Even though the impact will be low given the medium scope of civil works regarding construction of the faculties, the clearance, disturbance, or fires on young trees will affect dependent wildlife species especially since the protected Nyambai forest lies next to the proposed site (See Section 5.1). Another benefit that may be secondarily reduced include ground water conservation that occurs due to increased water carrying capacity of the soil through the roots of vegetation, nutritive quality of the forest topsoil from organic matter and reduced force of rainwater runoff, soil erosion and desertification. The design of the USET Campus has avoided impact on trees, and very few, if any, trees will be affected.

Also, since the site will naturally attract people during construction, there may be forest intrusion from people cutting trees for firewood or shed or even collecting food meant for biodiversity to sell. The students might use the forest as a camping venue whilst the community can dump all waste there since they are currently dumping waste on the proposed site. This is not significant waste and might have been left there for a long time (See Section 5.1 for pictures of the site). There is also a possibility of people setting bush fires or using it as a short-cut to access nearby communities.

Mitigation

- Hoarding of the construction site will serve as a deterrent to intruders of the forest and trespassers of the site.
- No fires and burning activities will be allowed by the contractor to prevent forest fires.
- Intensive sensitization of the workers on ground and all beneficiaries on environmental protection especially when it comes to waste management and illegal intrusion.
- Restoration of degraded areas which happened as a result of the Project to be conducted upon completion of the works.

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

i) Negative Impacts on Public Health and Safety

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

People at the College and surrounding may also be exposed to COVID-19 as well as risks for SEA/SH due to the presence of outside workers on site, as well as exposure to other communicable diseases.

Mitigation

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

All workers will be educated on the risks and prevention of sexually transmitted infections/diseases, as well as COVID-19. The project will implement awareness raising measures for students and local community about communicable disease risks (STDs, COVID-19, others) associated with the presence of an external workforce. Awareness-raising will also include dissemination of information around GBV, SEA/SH, and VAC risks, including information on prohibited conduct, available services, and related complaint procedures. This is also an important measure to avoid social conflicts. Workers will also undergo regular training and awareness raising of the Code of Conduct and be aware of sanctions for violations. The contractor must enforce adherence to the Code of Conduct, and all new project workers will receive induction training on its content and signed by them. The Project will monitor their implementation. A sample Code of Conduct is included as Annex A of the Grievance Mechanism.

Contractor will ensure that enough PPE will be available for workers and visitors. There will be signage on proper PPE and hygiene protocols and enforce social distancing and limit the presence of unnecessary persons on the construction site.

To prevent the spreading of COVID-19, outside workers will respect social distancing (working one meter apart from each other), wear eye covering and face masks, as well as practice good hygiene (with water and soap) which will be provided by the contractor.

ii) Negative Impacts on Health and Safety of Workers

There is risk of health and safety to workers during construction. Hazards include fumes, working with heavy equipment and parts, loud noise, road traffic accidents, chemical handling. The risk of COVID-19 spreading needs to be mitigated for the safe implementation of the Project. The Ministry of Higher Education, Research, Science and Technology (MoHERST) on behalf of Gambia Technical Training Institute (GTTI) will provide ample masks, hand sanitizer and will enforce practicing social distancing on site and during Lecturer recruitment and training. Risks related to sexual harassment in the workplace must also be addressed.

Mitigation

Workers must be informed of the associated hazards and risks, including regarding sexual harassment; training on the job and knowledge on procedures to reduce risks, including coordination and communication to avoid accidents, as well as information on prohibited conduct regarding sexual harassment, available services, and relevant complaint procedures. Fire extinguishers, personal protective equipment and first aid kits shall be provided, and training given on how to use them. Reporting of incidents is also essential for the review and improvement of safety procedures.

iii) Negative Impacts on the Affected Community

The Contractor will make sure that workers do not reside on site where some students and staff at the Gambia College live to mitigate the risk of COVID-19 spreading and the risk of SEA/SH. They are staying in their homes. No temporary accommodation on site. The Project must ensure proper sensitization to avoid competition for food, water between the contractor's staff, student and staff at the College and the local community.

Mitigation of Risks of COVID-19 and other Communicable Diseases at The Gambia College Community

- Most of the unskilled workforce shall be sourced locally (in the Brikama area) to reduce the need for importation of workers, they will also be residing in their own homes which can help reduce the spread of COVID-19. Employing local workers enhances community cohesion as the local workers know the community, culture, and norms, which may also help decrease risks of COVID-19, GBV, SEA/SH as well as the spread of STDs and other communicable diseases such as COVID-19.
- Nonetheless, to prevent STDs and COVID-19, as well as mitigate risk associated with SEA/SH, it is essential that Contractors are required through the contracts to educate their workers on the risks and prevention methods before, and regularly during works. Similarly, measures to educate and sensitize both workers and community members on the dangers as well as mitigation measures related to the prevention of acquiring STIs will be implemented. There will also be strict monitoring to ensure adherence to the relevant Code of Conduct (COC). The COC shall specifically prohibit SEA/SH, including any sexual relations with the College and local community members, and establish applicable sanctions for any infractions.
- Other mitigation measures include:
 - MoHERST and Contractor providing surveillance and active screening and treatment of workers

- Ensuring the Contractor routinely review the Code of Conduct, as well as the Action Plan for Implementing ESHS and OHS Standards, and any relevant provisions under the Project’s SEA/SH Prevention and Response Action Plan, with Project workers, including mandatory reviews with new workers to the Project site to ensure all workers understand behavior expectations and SEA/SH risks. The Social Safeguards Specialist of the Project will attend sensitization meetings to ensure they are taking place. The Code of Conduct is meant to:
 - Create awareness of the ESHS and OHS expectations on the project
 - Create common awareness about SEA/SH and VAC, as well as the grievance mechanism and the procedures for filing complaints related to SEA/SH
 - Ensure a shared understanding that SEA/SH and VAC have no place in the Project through inclusive and transparent consultation and the implementation SEA/SH action plan which is approved by the World Bank.
 - Create an ethical, safe and confidential handling of responding to and processing SEA/SH and VAC incidents.

The PCU and contractors shall rely on the COVID-19 protocol in Annex 1 and based on national, WHO and World Bank guidance for safety of workers and community beneficiaries. These include hand washing with soap/detergent, wearing of masks and social distancing. Handshakes are to be avoided while sneezing should be done using the elbow to cover the nose. In terms of public consultations, there should not be more than 10 people in any consultation and each should maintain a distance of at least two meters. This should be closely monitored by the E&S specialists to ensure that contractor’s staff closely follow these measures.

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

There is the risk of discriminating against vulnerable groups, such as women in the recruitment of workers at construction sites. With respect to those workers with disabilities, there could be adverse impacts on their ability to communicate as access to communication of information in a language or format that they can understand is not available. This also includes those with low levels of literacy. Also, during consultation, persons with disabilities present may not understand messages being conveyed due to lack of adequate accessible materials.

Mitigation

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

v) Risk of Child Labor and Forced Labor

In the Labor Act, 2007, the age of employment for children is 18, although they can be employed for light work at 16. Contracts for services, such as providing water for the project, may include risks of

child labor for minors below the age of 16, including when the parent contracted is unavailable for work, he/she may ask her child to work in his/her place during his/her absence.

Mitigation

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

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

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

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

Mitigation

Workers will have a valid employment contract and be sensitized adequately about the grievance mechanism (how to lodge complaints) and worker’s rights under the country’s labor code/policies. They will be encouraged to report such cases to the Grievance Redress Committee (GRC on Annex 3) before the contractor leaves the site upon completion of the works. Lack of conformity regarding fair labor practices will be subject to a fine or deduction on a submitted invoice.

vii) Negative Impacts on Chance Finds

Even though the site is not known for cultural heritage, there is always a possibility of finding cultural heritage by chance, particularly during land identification and preparation for works. These may be disturbed or lost due to lack of knowledge in managing cultural heritage discovered by chance, and OP 4.11 will be triggered.

Mitigation

Based on this ESMP, the ACE Impact Project shall avoid locating and designing activities that will affect cultural heritage. C-ESMP will further determine, through public consultations, whether there are likely discoveries of cultural heritage in the proposed Project site. If applicable, the Chance Find Procedures described in Annex 2 will be applied. These procedures include: avoidance of further disturbance and secure discovery, inform the supervisor for onward conveyance to MoHERST and subsequently the National Council for Arts and Culture (the legal institution responsible to manage cultural heritages).

Table 6-3 Potential Negative Impacts and Mitigation Measures for the infrastructural component of the ACE Impact Project

Phase		Potential impacts	Mitigation measures
Pre-construction Land clearing and preparation: bulldozing, excavating, and backfilling with earth; transportation and mixing of materials	Environmental	Clearing of land for construction and site access	Replanting of the number of young trees cut within the site and creation of green spaces at the end of the civil works.
		Felling young trees	To make the reference situation for the needs of the restoration of the sites Contractors must be cautioned through the clauses in their contracts to use only certified sand and gravel suppliers that have been approved by the NEA and Geology Department
		Accumulation of waste and debris during pre-construction	Dispose of green waste and excess materials at authorized landfills
		Dust and air pollution	Watering the platforms and access roads to the site
	Social	Disruption of community life resulting in community hostility and lack of support for project	Undertake adequate sensitization from start and promote the active consultation and participation of the College and local community in the project and also sensitize the workers about the community values and expected standard of behavior in the College and surrounding community prior to the start of civil works.
		Potential loss of cultural heritage from chance finds during construction	Consult the community on whether there are likely discoveries of cultural heritage in the proposed Project site. If applicable, the Chance Finds Procedures described in Annex 2 should be applied
		Contamination may spread offsite through air, surface water, or improper disposal	Ensure that proper disposal methods for waste are in place before the start of the construction works
		Risks of conflict with the College and local community as a result of SEA/SH and VAC risks	Sensitization of workers about the project's zero tolerance for GBV, VAC, SEA, SH. A Code of conduct must be enforced and monitored (See Sub-Annex A under Annex 3). companies, managers and staff must sign the code of conduct before civil works start and these will be explained to the workers through awareness raising workshops, including information on SEA/SH complaint procedures
		Risks to public health and safety during implementation of	Initiate sensitization and education programs for the College & local community and workers on the risks of

Phase		Potential impacts	Mitigation measures
		<p>activities from SEA/SH COVID-19 and other infectious diseases</p> <p>Contamination of STD/STIs and COVID-19 to workers, affected community and Education staff and students</p>	<p>COVID-19 infection and the health guidelines on wearing masks, social distancing, and hand washing. Communities to be also sensitized on the dangers and mitigation measures to address STD/STIs.</p>
Construction	Environmental	Degradation of storage sites of construction materials and equipment	Regular collection and evacuation of work site refuse in authorized dumps
		Air pollution due to vehicle rotation, noise, dust etc.	Put in place safety measures to reduce vehicle rotation and water the main road arteries used by vehicles in the Gambia College Premises to reduce dust.
		Pollution and noise nuisances; degradation of the living environment	Put in place a system to reduce noise and sensitize the operators of these engines
		Air pollution during the burning of some work site wastes (wheels, papers, etc.)	Ensure that burning of refuse will not take place.
		Impacts on protected areas such as the Nyambai Forest and habitats for rare species or of ecologic or domestic importance.	Avoid excavations of building materials in natural protected areas. Prohibit hunting at Nyambai Forest
		Potential pollution of the quality of surface and groundwater	Install work sites far from waterways and underground pipes. Regular collection of work site waste towards authorized dumps Ensure adequate spacing between toilets and water supply points
	Social	Conflicting demands on surface or groundwater supplies between the contractor and the College community in terms of quantity and timing of the use of the facilities.	Develop alternative supply source and if that is not feasible ensure that the contractor's water requirements can be supported by the College water supply system and finally ensure there is no conflict with the timing of the use of the facility.
		Risks of accidents at work sites and in the community during working hours	Conduct an awareness raising campaign for the work sites staff, the students, lecturers, and the local community. Reduce speed limits for vehicles travelling through the community.

Phase		Potential impacts	Mitigation measures
		Risks related to SEA/SH at the work site and between workers and community members	<p>Establish and require workers and project personnel to sign a code of conduct prohibiting SEA/SH and outlining sanctions.</p> <p>Establish project grievance mechanism with specific procedures to manage SEA/SH-related complaints ethically and confidentially, including response protocol with appropriate service referrals.</p> <p>Train workers and project personnel on SEA/SH, prohibited behaviors, sanctions, and GM procedures.</p> <p>Conduct community awareness-raising on SEA/SH, prohibited behaviors, and GM complaint procedures for SEA/SH incidents.</p> <p>Create female-friendly work environment with safe discussion spaces for women and targeted hiring of women in non-traditional roles and supervisory positions on work sites, as well as appropriate sanitation facilities on worksites that are sex-segregated, secure, and well-lit.</p> <p>Include SEA/SH mitigation measures in all bidding documents and vendor contracts, including for supervision consultants, and ensure that successful vendor hires a Social Specialist with GBV and/or gender background to monitor SEA/SH risk and implementation of associated risk mitigation measures.</p>
		Risks to public health and safety during implementation of activities from COVID-19 and other infectious diseases Contamination of SDT/STIs and COVID-19 to workers, affected community and Education staff & Students	Initiate sensitization and education programs for the community and workers on the risks of COVID-19 infection and the health guidelines on wearing masks, social distancing, and hand washing. Communities to be also sensitized on the dangers and mitigation measures to address SDT/STIs.
		Non-use of local workers	Prioritize hiring local labor and ensure transparent and fair hiring practices, including the recruitment of women, and in non-traditional and supervisory roles where possible

Phase		Potential impacts	Mitigation measures
		<ul style="list-style-type: none"> • Disruption or destruction of sites of cultural, historic, or religious importance • Destruction or illegal intrusion in the nearby Nyambai Forest. 	<ul style="list-style-type: none"> • Avoid siting the facilities in places that will impact historic, cultural, or traditional use. • Adequate sensitization and education programs for the workers and people in the surrounding on the importance of the Forest and the need to protect it.
		Chance finds of cultural & historic artefacts	Apply the required procedures as defined in the present document which is in line with the NCAC Act 2003 and in Annex 2
		Disturbance of College and education activities during works	Arrange to have truck deliveries after learning hours, in the evenings or on weekends and select work periods to avoid as much as possible periods of classes.
		Disturbance of the circulation of goods and persons by the engines, the storage of materials in the Gambia College Premises	Design traffic deviation plans approved by the concerned administrative authorities; Make careful selection of an installation site; Conduct an awareness raising campaign before the start of the works
		Risk of child labor which may have an impact on the education of the child.	Contractor to ensure that any person working or providing services is above the minimum age of 18. Similarly, any temporary replacement should meet this condition and proof of age should be provided i.e., birth certificate/ national ID and shall receive training on the Code of Conduct and COC signed.
		Risk of non-payment of work/services rendered by community members and other workers	Ensure that there is a valid contract for the work and that the community is adequately sensitized about the grievance mechanism, on how to lodge complaints and encourage them to do so for such cases. In case of non-compliance, invoices from contractors will be blocked until proper correction is done. Works can be suspended if necessary.
		Risk discrimination against vulnerable groups, including women, children, and people with disabilities	Ensure that the recruitment process is fair and transparent giving equal opportunity and that vacancy announcement is accessible to all in a timely manner.

Phase		Potential impacts	Mitigation measures
			<p>Ensure ramps exist in buildings or wheelchairs are available to facilitate moving around.</p> <p>For information access, provide information to workers and the community members in the language they understand and in a format that is accessible.</p> <p>SEA/SH risks must also be addressed for the same vulnerable groups, including application of the same mitigation measures cited above under community health and safety risks.</p>
		<p>Risk of illegal intrusion, waste dumping, setting of bush fires, collecting food meant for biodiversity to sell, cutting of trees for firewood or sale and setting up of camping venue/short-cut route at the Nyambai Forest.</p>	<p>Prohibition of fires or burning activities to prevent bush fires.</p> <p>Sensitization of the workers on ground and all beneficiaries on environmental protection especially when it comes to waste management and illegal intrusion.</p> <p>Restoration of degraded areas which happened as a result of the Project to be conducted upon completion of the works.</p>
Post Construction	Environment	<p>Inadequate cleaning and maintenance service, creating unhygienic conditions, and as a result student avoid using toilets.</p> <p>High cost of building materials especially cement to make blocks.</p>	<p>Employ caretakers to regularly clean the toilets and promote personal hygiene education in the sc.</p> <p>-A new, more cost-effective and sustainable method of using minimal amount of cement and earth to make environmentally friendly blocks will be used during construction.</p>
	Social	<p>Nonpayment of work and services rendered to the contractor</p>	<p>Ensure there is a valid contract with the workers and ensure that all such liabilities are cleared before the final payment of the contractor.</p> <p>In case of non-compliance, invoices from contractors will be blocked until proper correction will be done.</p> <p>Works can be suspended if necessary.</p>
		<p>Risks related to SEA/SH at work sites and between workers and community members</p>	<p>Include SEA/SH mitigation measures in all contracts, including for supervision consultants, and include SEA/SH and VAC in the curriculum for teacher training.</p>

Environmental mitigation and monitoring will be carried out to ensure that various mitigation measures are implemented during different phases of the project life cycle and are properly monitored. The mitigation measures proposed during various phases of construction life cycles are given in the Environmental and Social Mitigation and Monitoring Plan stated in Chapter 6. The plan provides details of various social and environmental impacts in different phases of construction project, proposed mitigation and monitoring as well as person(s) responsible for the same and frequency of mitigation and monitoring measures. Effective implementation and follow up of the plan are the spirit of the entire efforts to add value to the natural and social surroundings and is required to be holistically followed by the respective personnel. The Plan must be part of the bidding documents and subsequent contract agreement, so that its implementation is ensured at all stages.

7. MANAGEMENT OF RISKS AND ACCIDENTS

This Chapter identifies and analyses the potential risks and accidents that may occur during the Project. It further outlines the main issues to be addressed by the Contractor including mitigation and prevention, training needs, contingency and emergency response planning, recording, reporting and monitoring.

7.1 Methodological Approach for Hazards and Risks Identification

7.1.1 Objectives of the Risk Assessment and Management

The main purpose of the risk assessment is to:

- identify potential risks of the Project activities (factors / hazards that have the potential to expose the workers, communities, and site to harm)
- evaluate which risks require priority actions
- recommend corresponding measures to prevent or reduce the risks, and at last resort, protection against the risks

7.1.2 Methodology

In this risk identification, the Project activities (sources of hazards and risks) earlier stated were correlated with a list of possible risks in Chapter 6.

Further analysis of the risks (severity, probability, exposure levels and possibility of control) will consider their importance and magnitude of mitigation measure needed for prevention or effective management.

Following the risk analyses, corresponding to preventive and protective measures are then recommended for mitigation. These should follow the mitigation hierarchy from elimination, control, and reduction of the risks to providing protection against the hazards.

7.2 Risk Analysis

Table is an example of risk analysis using the described procedure. The Contractors shall develop similar matrices for the construction and operation phases. The Contractor shall tailor-make the analyses based on the specific tasks, resources, personnel, procedures etc. they plan to employ.

Risk significance Key:

- 0** = significance of risk
- 1 - 5** = low significance of risk
- 6 - 9** = medium significance of risk
- 10 - 15** = high level of concern

	Risk prohibited, requires immediate action
	Medium risk, actions to be scheduled
	Tolerable risk, no action required

Table 7-1: Preconstruction & Construction Phase Risk Analysis Matrix

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
1	Sabotage	Poor consultations, non-cohesive communities	Consultation activities	All Project workers (Consultant / Project staff / Contractor)	2	1	1	4	4	0		Consultations to start well in advance during the project development phase to enhance acceptability
2	Movement and circulation risks such as traffic accidents	Increased movement of vehicles and number of people	Physical surveying	Workers	2	3	3	2	8	6		Workers must employ good driving and parking skills; avoid parking in middle of roads; use reflector vests; use hazard lights Train all drivers on defensive driving
			Clearing for access and site	Workers and the public	3	3	4	2	10	8		Regular supervision of workers; employ qualified workers; train workers; restriction warning signs;

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
												inform community to avoid site; work during daylight only
			Stockpiling of materials	Workers and the public	3	4	3	2	10	8		Constant supervision of workers; employ qualified workers; train workers; restriction warning signs; inform community to avoid site; work during daylight only; secure stockpiles
3	Air and Noise Pollution	Heavy equipment; workers	Clearing for access and site	Workers and the public	4	1	2	2	7	5		Use appropriate, well-serviced equipment; provide protective gear for workers; restriction warning signs; inform community to

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
												avoid site; only work during the day.
			Construction Works	Workers and the public	8	4	4	4	8	5		Use appropriate, well-serviced equipment; provide protective gear for workers; restriction warning signs; inform community to avoid site; only work during the day
4	Vibration risks	Heavy machinery and hand-held tools	Clearing for access and site	Workers	2	3	3	4	8	4		Use of appropriate machinery and equipment based on the type of terrain
			Construction Works	Workers	2	3	3	3	8	5		Limit exposure by reducing working hours on handheld equipment.

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
5	Risks related to improper use and storage of equipment	Heavy machinery, sharp and hot objects	Clearing for access and site	Workers and the public	4	4	4	2	12	10		Employ workers with requisite skills; keep equipment in secure; restrict access to site.
6	Fires	Vegetation and other waste from clearing	Clearing for access and site	Workers and the public	3	3	3	2	9	7		Follow waste management plan for safe disposal of waste.
7	Personal injuries such as cuts, struck by objects, stepping on objects, falls	Hanging trees branches, stones, equipment etc.	Physical survey of proposed project site	Workers	3	2	3	3	8	5		Use trained personnel that incorporate health and safety issues in the works program; use personal protective gear
			Clearing for access and site	Workers and the public	4	3	5	1	12	11		Use trained personnel that incorporate health and safety issues in the works program; provide personal

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
												protective gear; prohibit public access to site
			Construction Works	Workers and the public	2	2	5	2	9	7		Use trained personnel that incorporate health and safety issues in the works program; provide personal protective gear
			Stockpiling of materials	Workers and the public	3	4	4	3	11	8		Prohibit public access to stockpiles; use security personnel
8	Respiratory risks	Dust, gaseous vehicular emissions	Clearing for access and site	Workers and the public	4	2	5	3	11	8		Provide masks for workers; prohibit public access to work sites; give prior notification to the surrounding residents.
			Construction works	Workers	2	2	4	3	8	5		Provide masks for workers; prohibit public

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
												access to work sites
			Stockpiling of materials	Workers	2	2	3	2	7	5		Provide masks for workers; prohibit public access to work sites
			Stockpiling of materials	Workers	2	2	5	4	9	5		pack materials only at designated storage facility; employ security personnel
9	Contagious illnesses from presence of workers, ingestion of contaminated food or drink	Microbes (e.g. STIs, E-coli, COVID-19)	Physical surveying	Workers, Community members	2	4	5	2	11	9		Education and awareness on prevention of diseases and relevant codes of conduct; provision and use of masks.
			Clearing for access and site	Workers, Community members	4	4	5	2	13	11		Educate workers and community on risks and prevention of contagious illnesses; provide

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
												protection; provide sanitation means for workers; reduce importation of workers.
			Construction Works	Workers, Community members	2	4	3	2	9	7		Educate workers and communities on risks and prevention of contagious illnesses; provide protection; provide sanitation means for workers.
			Physical surveying of proposed site	Workers, Community members	2	3	4	2	9	7		Educate workers and communities on risks and prevention of contagious illnesses; provide protection; provide sanitation

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
												means for workers.
10	Wildlife attacks (reptiles, insects, and animals etc.)	Wildlife (e.g. snakes, bees, dogs etc.)	Physical survey of proposed project site	Workers	5	5	2	1	12	11		First aid kits made available; discuss with the community about wildlife risks; include awareness on response and recovery
			Clearing for access and site	Workers	5	5	3	1	13	12		First aid kits made available; discuss with the community about wildlife risks; include awareness on response and recovery
			Construction Works	Workers	5	5	4	1	14	13		First aid kits made available; discuss with the community about wildlife risks; include awareness on response and recovery

	Risk	Hazard	Source of Risk	Who is at Risk	Exposure level	Severity	Probability	Control	Actual Risk	Significance	Level of Significance	Mitigation
11	Work related stress	Overexertion, hot work environments, long work hours, untrained for the task	Clearing for access and site; Construction Works	Workers	5	3	5	2	13	11		Control work hours to include enough rest time; do not work at night; provide adequate training and employ qualified workers;

8. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

8.1 ESMP Implementation and Monitoring Arrangements

8.1.1 Roles and Responsibilities for ESMP Implementation

This is a Project for GTTI which is one of the institutions under the Ministry of Higher Education. MOBSE is assisting them because they do not have an E&S safeguard Team. Implementation of this ESMP is the responsibility of the PCU MoBSE and GTTI. However, mitigation measures with respect to civil works activities will be the responsibility of the contractor, and the PCU MoBSE and GTTI will monitor and supervise. GM operation is the responsibility of the PCU.

The PCU MoBSE and GTTI will be responsible for follow-up, and to ensure that the ESMP is fully implemented with the support of the PCU MoBSE Environmental Safeguards Specialist (ESS) and Social Safeguards Specialists (SSS) who will work with the Environmental & Social Focal Points to be recruited by GTTI. Clauses will be included in the Contractor's agreements that will ensure compliance and coordination with the GM, among others.

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

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

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

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

a) MoBSE Projects Coordination Unit (PCU) & Gambia Technical Training Institute (GTTI)

The GTTI Staff, MoHERST, MoBSE and PCU staff that will be involved in the implementation of the ESMP will include the following, among others:

- Project Manager - PCU
- Deputy Project Manager - PCU
- Environmental Safeguards Specialist (ESS) - PCU
- Social Safeguards Specialist (SSS) - PCU
- Procurement Officer - PCU
- Construction Program Manager - PCU
- Quantity Surveyor - PCU
- Senior Financial Management Specialist (SFMS) - PCU
- MoBSE Gender Unit

- MoBSE Special Needs Unit
- Director General – GTTI
- Director of Academics – GTTI
- Director of Admin & Finance – GTTI
- Registrar – GTTI
- Chief Accountant – GTTI
- USET Administrator – GTTI
- E&S Focal points – GTTI
- Monitoring and Evaluation Officer - MoHERST

The PCU and GTTI will oversee the implementation of this Project, including the C-ESMP. Their other responsibilities will include:

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

b) Specific Roles and Responsibilities of Project Personnel

1) Project Manager (PM) – PCU, USET Administrator - GTTI & Director General (DG) – GTTI

The PM-PCU MoBSE, DG-GTTI and USET-GTTI Administrator will oversee the implementation of the Project, and consequently the ESMP, and will have the responsibility for ensuring that implementation of the ESMP is carried out as required under the national law and the World Bank's Procedures.

2) PCU Environmental Safeguards Specialist (ESS) & GTTI Environmental Focal Point (EFP)

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

The ESS and EFP will provide day-to-day management of all environmental issues and activities including the implementation of the ESMP, in collaboration with NEA. They will prepare monthly progress reports for submission to the PCU and GTTI for transmission to the PM-PCU, DG-GTTI, MoHERST, the World Bank. They will also directly oversee the implementation of the capacity building of stakeholders on environmental and social safeguards.

3) PCU Social Safeguards Specialist (SSS) & GTTI Social Focal Point (SFP)

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

periodic reports on progress on social issues.

These reports will be submitted to the PCU and GTTI for transmission to the MoHERST, GTTI and the World Bank. The SSS and SFP will directly oversee the implementation of the capacity-building of stakeholders on the GRM and the implementation of all risk mitigation measures under the project's SEA/SH Prevention and Response Action Plan, including codes of conduct that address GBV, including SEA/SH and VAC, appropriate GM procedures and associated response protocol, and related trainings and awareness-raising activities.

The Social Safeguards Specialist and Social Focal Point will both have a background on gender and/or GBV prevention and response programming in order to assure a basic understanding of SEA/SH risk and the related mitigation measures to be put into place. The Social Safeguards Specialist will act as a mentor to the Social focal Point with a view to have him/her to eventually work independently as GTTI's first point of call to deal with social issues including SEA/SH and VAC. They will work together on all social issues including the implementation of mitigation measures and operation of the GM.

Table 8-1 Summary of Roles and Responsibilities for ESMP Implementation

No.	Steps/Activities	Responsible	Collaborating Partners	Service Provider
Preparation of the Project activities documents etc. in accordance with the national legislation / procedure and the World Bank's policy guidelines				
1	Report validation and issuance of the permit (when required)	PCU ESS/SSS & GTTI EFP/SFP; PM - PCU/DG -GTTI	NEA	PCU/GTTI
	Disclosure of the document	PCU ESS/SSS & GTTI EFP/SFP; PM - PCU/DG -GTTI	PCU ESS/SSS & GTTI EFP/SFP; NEA	Consultant; World Bank
		PCU ESS/SSS & GTTI EFP/SFP	NEA; MoHERST	MoHERST, GTTI and the PCU; also disclosed on the World Bank's external website
2.	(i) Integrating the mitigation measures of the planned activities and E&S clauses in the bidding document prior to being advertised, including provisions related to SEA/SH (ii) ensuring that the contractor integrates relevant ESMP measures in the activities, including those related to SEA/SH	PCU ESS/SSS & GTTI EFP/SFP; PM - PCU/DG - GTTI	PCU ESS/SSS & GTTI EFP/SFP; MoHERST, PCU, GTTI, DG – GTTI, PM - PCU; Contractor	Contractor; NEA

3.	Implementation of the other safeguards' measures, including environmental and social monitoring (when relevant) and sensitization activities, taking into account SEA/SH risk	PCU ESS/SSS & GTTI EFP/SFP	NEA and EIA Working Group; PCU; GTTI; General public	Consultants; Other relevant public institutions
4.	Oversight of safeguards implementation (internal)	PCU ESS/SSS/PM-PCU/DG-GTTI	PCU, GTTI;	MoHERST PS and Management
	Reporting on project safeguards performance and disclosure	PM-PCU/DG-GTTI	PCU ESS, SSS; GTTI EFP, SFP	MoHERST PS and Management
	External oversight of the project safeguards compliance and performance	EIA Working Group/NEA	PM-PCU; DG-GTTI; PCU ESS; PCU SSS; PCU; GTTI	MoHERST PS and Management
5.	Building stakeholders' capacity in safeguards management	PCU-ESS; PCU-SSS	PM-PCU; DG-GTTI; GTTI-SFP GTTI-EFP; NEA	MoBSE PCU Safeguards Team Other qualified public institutions

8.1.2 Capacity Development

The ESMP also identifies the capacity development needs for its effective implementation. For this purpose, PCU, MoBSE, and GTTI will arrange/coordinate environmental and social trainings for its Environmental and Social Specialists (ESS) and Environment and Social Focal Points (ESFP) respectively. In addition, capacity development would also be needed for the relevant officers/staff of the Project Directorates and relevant officers to ensure sustainability of E&S Safeguarding for projects. The contractors will be responsible to conduct such training for their own staff. Training regarding SEAH, codes of conduct, GM will be implemented by the PCU.

8.1.3 Monitoring

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

Internal monitoring will be the responsibility of the Environmental Safeguard Specialist (PCU), Social Safeguard Specialist (PCU), Environmental Focal Point (GTTI) and Social Focal Point (GTTI) within the MoBSE PCU and GTTI to ensure compliance with national laws and procedures and the World Bank's safeguards policies. With regards to COVID-19, they will also monitor to ensure that WHO and national

guidelines are followed and updated accordingly, and practices revised as the situation evolves. Any monitoring related to SEA/SH and VAC risk and complaints must adhere to international best practices and norms regarding the confidential management of SEA/SH case and survivor data as well as the World Bank's Good Practice Note for "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Major Civil Works".⁷ And also about increased understanding about the COVID-19 spreading and mitigation measures.

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

The NEA and other relevant institutions identified in the ESMP will monitor compliance with requirements under Gambian law. Selected relevant Technical Advisory Committee members for example (including the representatives of NEA and MoHERST who will provide leadership and technical support respectively) will conduct monitoring visits to the Project site. Technical Advisory Committees members whose sectoral expertise will not be useful, nor add value to the process, will not be included in the TAC monitoring team. This arrangement will ease coordination and lower expense on resources. Furthermore, it will be more cost-effective and focused to use the region 2 TAC than displace members of the national EIA Working Group (in the Greater Banjul Area) to monitor Project activities in Region 2 where the Project will be implemented. The region 2 TAC members are also supposed to be more familiar with the local terrain and community.

NEA's representative in the TAC will forward the monitoring reports to the NEA Headquarters for eventual transmission to the PCU and GTTI.

A monitoring plan with frequency and indicators is further outlined in Table 8.2.

⁷ WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies (2007); GBVIMS Best Practices <http://www.gbvims.com/wp/wp-content/uploads/BestPractices2.pdf>. World Bank (2020) "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Major Civil Works" (2nd edition). <https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf>

Table 8-2 ESMP Monitoring Program

No.	Risk Mitigation measures to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to monitor	Monitoring frequency	Monitoring indicators
1	Mitigation of SEA/SH and VAC risk	PCU MoBSE & GTTI	SSS/SFP with support from the Women’s Bureau and Department of Social Welfare	Before & during project implementation	Quarterly	<ul style="list-style-type: none"> • No. of worker sensitization meetings on codes of conduct prohibiting SEA/SH and VAC • % Of workers and project personnel who signed code of conduct prohibiting SEA/SH and VAC • % Of workers trained on SEA/SH and VAC, codes of conduct, and GM complaint procedures • % Of workers trained who score above 70% on post-test • No. of independent consultations with female students and women in safe and enabling environments (with same-sex facilitators) and number of participants • No. of College and community sensitization meetings where GBV/SEA/SH and VAC risk and discrimination are discussed, including GRM complaint procedures and response to SEA/SH complaints • Number and type of complaints through the GM, including SEA/SH and VAC (there should be no target for SEA/SH and VAC complaints) • % of SEA/SH and VAC complaints referred for support services • % of SEA/SH and VAC complaints resolved within the prescribed delay under the GRM • % of SEA/SH and VAC complaints resolved outside of the prescribed delay under the GM

						<ul style="list-style-type: none"> • Average time for resolving SEA/SH and VAC complaints • Number and type of complaints relating to discrimination and exclusions from benefits and inequality (for example based on vulnerability such as sex, age, etc.) • Number of women hired in the Project and in which type of roles
2	Mitigation against the transmission of COVID-19 and other communicable diseases	PCU MoBSE & GTTI/ Contractor	SSS/SFP with support from the Ministry of Health	Before and during project implementation	Quarterly	<ul style="list-style-type: none"> • No. of sensitization meetings/programs for the College management community, lecturers, students and education personnel on mitigating the spread of COVID-19 and other communicable diseases. • No. of public sensitization meetings and programs on WHO and national guidelines on the prevention of the spread of COVID-19 and other communicable diseases. • Number of cases of COVID-19 and other communicable diseases registered among workers and members of the college and surrounding community.
3	Risks to exclusion of Women and youth (eg Discrimination in employment, exclusion during consultation)	Contractor PCU MoBSE, GTTI	PCU SSS, GTTI SFP	Before and during works	One time before work and after activities start	<ul style="list-style-type: none"> • No. of independent consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of youth participating in consultations (male and female) • No. of youth employed by the Project (male and female) • No. of women to be employed during the works.

4	Labor influx risks on Children and vulnerable people	Contractor / PCU MoBSE / GTTI	PCU SSS, GTTI SFP	Before and during project	Quarterly	<ul style="list-style-type: none"> • No. of reports of child labor / abuse • No. of women participating in consultations • No. of Community sensitization meetings where VAC issues are discussed • No. of meetings on GM relating to SEA/SH Complaints • Completion rates signing CoC by workers. • Training of workers on CoC. • No. of reports of children involved in Project related accidents
5	Risks to Public and worker health and safety	Contractor	ESS/EFP/SSS/SFP/NEA Beneficiaries	Before starting of activities	Quarterly	<ul style="list-style-type: none"> • No. of accidents related to the Project activities • No. of health education / sensitization sessions, including on SEA/SH and VAC risk • No. of complaints /reports on lack of measures to address air polluting emissions • No. of protective gear provided to workers
6	Improper waste management risk	Contractor	ESS/EFP/SSS/SFP/NEA	During activities implementation	Quarterly	<ul style="list-style-type: none"> • No. of waste dumping sites on and around the site. • No. of sensitization meetings on waste management. • No. of contracts that included waste management clauses • Waste management plan developed • No. of reports/complaints on waste management issues
7	Risk to Project sustainability/legitimacy regarding Community expectation on local labor employment	Contractor/ PCU MoBSE /GTTI	ESS/EFP/SSS/SFP	Before and during activities implementation	Annually	<ul style="list-style-type: none"> • No. of people employed from the local community. • No. of contracts that specify use of local labor • No. of community conflicts because of Project.

8	Risks of exclusion or improper Consultation and lack of awareness of project activities to beneficiaries	Contractor/ PCU MoBSE /GTTI	ESS/EFP/SSS/SFP	Before and during works	Annually	<ul style="list-style-type: none"> • No. of consultative meetings with beneficiaries • No. of independent culturally appropriate consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of complaints on lack of consultation • No. of minutes /reports of consultations • No. of persons in attendance
9	Risk of lack of Social cohesion	PCU MoBSE / GTTI /community	PCU/GTTI	Before and during works	Quarterly	<ul style="list-style-type: none"> • No. of locals employed • No. of community conflicts
10	Traffic Risk	Contractor/ PCU MoBSE /GTTI		During the works	Quarterly	<ul style="list-style-type: none"> • Training of Project workers on traffic and road safety. • Sensitization of the Communities on specific times which the roads will be used by the Project. • No. of signages around the site and communities surrounding the Project area.

8.1.4 Reporting

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

It is recommended that, after their quarterly monitoring activities, NEA submit monitoring reports to MoHERST (through PCU/GTTI) on its monitoring of the ESMP implementation. NEA will work with its Regional Environment Officer in region 2 to ensure issues reported by the PCU Environmental and Social specialists or GTTI Environmental and Social Focal Points and Technical Advisory Committee are incorporated and follow-up actions by the various affected institutions and stakeholders coordinated accordingly.

Where incidents or accidents occur that require immediate action, NEA shall report to E&S specialists of PCU MoBSE or E&S focal points of GTTI immediately, and MoHERST should in turn notify the World Bank immediately and no later than 48 hours after becoming aware of such incidents or accidents for serious accidents, and no later than 24 hours for severe accidents, including GBV incidents or. An incident/accident report shall be prepared not later than 7 days after said notification. This notification system shall be in effect throughout the Project. The Social and Environmental Safeguards Specialists shall be responsible for handling all reported cases of accidents and SEA/SH incidents.

The PCU/GTTI, according to the work plan, shall submit all monthly and quarterly reports to the NEA and World Bank for consideration.

8.1.5 Environmental and Social Auditing

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

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

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

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

8.1.6 Budget for Implementation of the ESMP

The proposed budget for implementation of the ESMP is US\$ 132,000 as indicated in Table 8.3.

Table 8-3 Estimated Budget to Implement the ESMP

No.	Activity	Time Frame	Expected Outcome	Budget (US\$)	Responsibility to coordinate
1	Capacity Building				
	Workshops and meetings to strengthen the capacity of the Region 2 TAC in managing issues regarding environmental and social safeguards on ESIA, including on SEA/SH	First quarter of the Project implementation	<ul style="list-style-type: none"> TAC members oriented on Environmental and Social Safeguard policies that are relevant to the USET project. Issues of SEA/SH understood. 	1,000	NEA/PCU/GTTI/ESS/EFP/SFP/SSS
	Capacity building of MoHERST and GTTI Senior Management Teams	First quarter of the Project implementation	<ul style="list-style-type: none"> Environment and Social risk management issues understood, including ESS and ESF. Roles and responsibilities of GTTI staff in the implementing the ESMP understood. Risks and method of propagation of COVID-19 understood and the measures to reduce its spread and provision of mask, hand sanitizer and enforcement of social distancing and other measures imposed by the Government of The Gambia. 	10,000	MoHERST Management / GTTI / PCU
	Capacity building of Relevant Safeguards Implementers (PCU)	Annually	<ul style="list-style-type: none"> Capacity enhancement in ESIA Procedures. 	25,000	MoHERST Management / GTTI / PCU

No.	Activity	Time Frame	Expected Outcome	Budget (US\$)	Responsibility to coordinate
	Safeguards Team, MoHERST Focal Point and GTTI E&S Focal Points).		<ul style="list-style-type: none"> • Improve and create awareness of Safeguards management procedures. 		
	Capacity building of relevant MoHERST staff and stakeholders on environmental and social safeguards and their roles, including responsibility for SEA/SH risk	Annually for MoHERST staff and six (6) times for MoHERST Stakeholders (includes consultation on the development of Safeguards tools) during project implementation	<ul style="list-style-type: none"> • Project components and related activities known • Capacity enhanced in ESIA Procedures • ESMP requirements understood • Roles and responsibilities of stakeholders with regard to the ESMP understood • Plan for enforcement of the ESMP developed • Stakeholder knowledge and skills in SEA/SH and VAC risk mitigation, prevention, and response strengthened Reviewing WHO/Government of Gambia guidelines, on COVID-19 and provision of masks, sanitizer, etc.	10,000 for MoHERST Staff 5,000 x 6 = 30,000 for MoHERST Stakeholders	MoHERST Management / GTTI / PCU
	Implementation of GM related to activities and mitigation measures, including procedures for ethical and confidential management of SEA/SH and VAC claims	First and second quarter of the project implementation	Increased community understanding and participation on Environmental and Social risks and benefits; (developments, progress, SEA/SH, VAC and GRM procedures, etc.) through relevant radio and TV programs and public meetings as appropriate.	2,000	NEA/PCU/ESS/SSS Ministry of Health
2	ESMP Implementation, Monitoring, Evaluation and Reporting				
	Implementation of the mitigation measures, including SEA/SH	Annually during all phases	Increased community understanding and participation on environmental and social aspects related to the Project, including SEA/SH and VAC risk	1,000 x 6 = 6,000	PCU/GTTI

No.	Activity	Time Frame	Expected Outcome	Budget (US\$)	Responsibility to coordinate
	Regular environmental and social monitoring of the implementation of mitigation measures and the activities, including for SEA/SH	Project implementation period	Environmental and social mitigation measures and activities including for SEA/SH monitored.	5,000	NEA/PCU/GTTI
	Audit of environmental and social measures	During and after construction	Environmental and social measures audited to gauge the gaps of the environmental and social risk	5,000	PCU/GTTI/NEA/Consultant
	Sensitization to raise awareness on the Project issues like COVID-19 risks and mitigation measures during consultations, trainings, and site visits and meetings. Acquisition of masks and hand washing detergents. Personal protection equipment (PPE)-sanitizers, masks etc. for the Gambia College to prevent spreading of COVID-19.	Throughout project implementation period.	Spread of COVID-19 prevented	1,000	PCU/GTTI
3	Operation of the GM				
	Field investigations/visits	Project implementation period	GRM implementation monitored.	2,000	GRC
5	Monitoring and evaluation of the environmental and social impacts of the project at communities surrounding Gambia College			<u>15,000</u>	PCU/GTTI
6	External evaluation			<u>20,000</u>	PCU/Consultant
Total				<u>132,000 USD</u>	

9. CONCLUSION AND RECOMMENDATIONS

9.1 Conclusion

This ESMP has been prepared based on environmental and social assessments conducted to equip the relevant authorities of the MoHERST, MoBSE and GTTI plus all stakeholders with relevant and sufficient environmental information about the proposed Africa Higher Education Centers of Excellence for Development Impact Project. It is hoped that the authorities in MoHERST will use this information to evaluate the environmental viability and sustainability of the proposed project. The project has environmental impacts but which do not have long term and cumulative nor significant impacts. The proposed development project explains the various economic and educational benefits not only to the local community within the project area, but to the entire nation as a whole, particularly in supporting access to Higher Education as well as filling of gaps in terms of producing graduates in the Engineering sector. The negative environmental impacts that have been identified and are associated with the implementation of this project are minimal and could be addressed by implementing the mitigation measures proposed to ensure that they pose no threat to the environment and to the neighbouring community. These measures are part of the projects' component and will bring no added cost in the implementation process.

9.2 Recommendations

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

Annex 1: Protocol for Consultation and Civil Works under Covid-19
THE SECOND AFRICA HIGHER EDUCATION CENTERS OF EXCELLENCE FOR DEVELOPMENT (ACE)
IMPACT PROJECT IN THE GAMBIA

1. Introduction

The novel coronavirus disease (COVID-19) has been spreading rapidly across the world since December 2019, following the initial cases in Wuhan, Hubei Province, China. Whilst the pandemic imposed enormous strain on the health systems as they try to cope with the increase demand for services, it has also resulted in tremendous economic and social hardship as governments institute measures such as ‘social distancing’ to limit the spread of the disease. One of the consequences of these measures was the closure of institutions, stoppage of civil works, trade and travel, closure of borders, and other economic activities.

A key source of guidance on communications, civil works, and stakeholder engagement that the Project will draw on is the Ministry of Health guidelines which are in line with the World Health Organization’s (WHO) “COVID-19 Strategic Preparedness and Response Plan: Operational Planning Guidelines to Support Country Preparedness and Response” (2020). These guidelines outline the following approach in their Risk Communication and Community Engagement - Pillar 2.

It will lay the basis for the Project’s stakeholder engagement and civil works implementation approach. The project will also draw on other recently available resources for carrying out the implementation of the civil works in the context of COVID-19, including the World Bank’s “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020). These guidelines will be taken into consideration for the civil works in order to protect workers, the affected community and Project staff.

Given the social distancing recommended in order to stop or reduce the COVID-19 transmission, the Project has decided to elaborate this Protocol in order to implement the upcoming stakeholder sensitization and civil works implementation.

1.2 Methodology

To meet best practice approaches, the Project will apply the following principles for stakeholder engagement and civil works implementation:

- ***Openness and life-cycle approach:*** public consultations for the Project will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- ***Informed participation and feedback:*** information will be provided to and widely distributed among all stakeholders in an appropriate and accessible format and language; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns.
- ***Inclusiveness and sensitivity:*** Stakeholder identification will be undertaken to support better communication about project activities and development, transparency, accountability and build effective community relationships. The participation process for the project will be inclusive and will consider vulnerable and disadvantaged groups to ensure they can attend and fully participate in discussions. All stakeholders are encouraged to be involved in the consultation process, and this includes ensuring that the time of day of meetings is suitable for all and that persons with disabilities are able to attend and participate. Every college and local community member will have access to information. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods and the time and location

of meetings. Special attention should be given to vulnerable groups, in particular women, youth, disabled, elderly, and the cultural sensitivities of diverse ethnic groups. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women.

- **Flexibility:** if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet, radio, or TV communication, and communication via mail.
- **A precautionary approach** will guide consultation process and civil works implementation to prevent infection and/or contagion, given the highly infectious nature of COVID-19 especially the Delta variant of the virus which is currently making wave in the continent. **Worker and Community Health and Safety:** to avoid or reduce the risk of contagion or spreading the COVID-19, all workers will wear their mask, goggles, and other personal protective equipment (PPE) and respect social distancing protocols at the site. Same measures will be followed in interactions with the college and local community.
 - **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
 - **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status⁸ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women.

1.3 Consideration of impacts on disadvantaged/vulnerable individuals or groups

It is particularly important to understand how project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups who often do not have a voice to express their concerns or may not be considered fully when addressing the impacts of a project. It is equally important that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be undertaken with respect to infectious diseases and medical treatments. Such consultations must be adapted to consider such groups and/or individuals concerns and cultural or other sensitivities and to ensure a full understanding of project activities and benefits. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women. The vulnerability may stem from person's origin, gender, age, health condition, economic status, disability, livelihood, among others. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their

⁸ Vulnerable status may stem from an individual's or group's race, national, ethnic, or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, health status, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources, among others.

participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following: women-headed households, elders, youths, and persons with disabilities. Vulnerable groups within the community affected by the Project will be consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

1.4 Strategy

The PCU MoBSE and GTTI in collaboration with the stakeholders, and especially with the Contractor, will identify and examine all the activities planned within the ESMP of the project requiring the engagement of stakeholders, public consultations, and civil works implementation.

The Contractor, GTTI and PCU MoBSE will evaluate the targets, the location, and the size of the proposed activities. Personal contact and large social gatherings or meetings will be limited and all protocols from the Government regarding social distancing will be respected. The Contractor will assess the level of risk of spread to the community and how best to align with restrictions in effect at the national level.

In addition, the Contractor, GTTI and PCU MoBSE will identify the critical activities for which the consultations cannot be postponed without significant impact on the project deadlines. At the end of this exercise, The Contractor will consider viable means to obtain the contributions and commitment of stakeholders.

Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered.

Where planned civil work activities require college and local community meetings, The Contractor will assess how to put in place proper social distancing and make available PPE such as masks, eye shields, hand sanitizers, etc. for workers and community members.

Before consultation and civil works are able to start, the Project will require the Contractor to identify and visit the affected college and local community.

The objective of this mission will be to:

- The Contractor, GTTI and the PCU will also assess the media coverage to see which media channels are more suitable for spreading information about COVID-19 preventive measures, who to contact if people are exhibiting symptoms, and how to contact the Grievance Redress Mechanism (GRM) should community members have additional questions or concerns.
- According to the affected areas, the Contractor, GTTI and PCU will review the best telecommunication coverage to decide which ones they will use to communicate with the college and local community, taking into account the commitment to inclusive and accessible participation and communication.
- Traditional communication channels will also be assessed to verify how they can be effective in conveying relevant information to stakeholders.

According to the outcomes of this first field visit, the Contractor, GTTI and the PCU will be able to start site preparation and sensitization of the affected community about the ESMP, GRM, information about SEA/SH risks, especially around civil works, access to services, and how to lodge complaints through the GRM, and COVID-19 mitigation measures that are recommended by the WHO and the Ministry of Health.

Following the field visit, the Project will implement specific measures to mitigate the risk of the COVID-19 transmission.

A precautionary approach will guide the consultation process and the implementation of civil works to prevent transmission and infection, given the highly infectious nature of COVID-19.

The following are some considerations for selecting channels of communication and encouraging behavior for the safe implementation of the civil works, considering the current COVID-19 pandemic:

- Avoid public gatherings (considering national advisories).
- As smaller meetings are permitted with social distancing, consultations will be conducted in small-group sessions, such as focus group meetings. Efforts will be made to conduct meetings through telephone or, if possible, online, channels to reduce risk of contagion or contamination.
- Employ channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Communication channels can also be highly effective in conveying relevant information to stakeholders and allow them to provide their feedback and suggestions.
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, online platforms, dedicated phone lines with knowledgeable operators.
- communication channels during COVID-19 will also help women receive accurate information about SEA/SH risk, access to services, and the project GRM.
- Each of the proposed channels of engagement will clearly specify to community members how feedback and suggestions can be provided by stakeholders via the project's GRM.

1.5 Management of COVID-19 during civil works

A special COVID-19 induction will be performed for each employee before they are able to start work. Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered. This induction will be entirely dedicated to COVID-19 and will include information on:

- How it spreads
- How to protect oneself (including washing protocols)
- How to properly use PPE (mask and gloves) and requirements of wearing PPE
- Understanding symptoms and what to do if one is exhibiting them
- Understanding the impact of COVID-19 on vulnerable groups (who is vulnerable)

This induction will be renewed for all workers every month and every day before the start of activities, a specific briefing will be carried out by the Site Manager who is the team leader.

The Site Manager will address the following points:

- Reminder of the context and the need to respect the rules
- Reminder of barrier gestures: how to cough, hand hygiene (basins containing water and soap will be always available on site), social distancing and wearing a mask
- Taking of temperature every morning before works start
- Reminder of the exceptional measures applicable to the activities concerned
- Reminder of the main symptoms of COVID-19
- Reminder of the COVID-19 Hotline 1052

Monitoring of symptoms and other hygiene and mitigation protocols:

- Symptoms associated with COVID-19 will be monitored in workers. Each worker should monitor the onset of symptoms for themselves and colleagues and inform their manager immediately if they feel unwell or suspect a colleague is not feeling well. If symptoms appear during the night, the employee should notify their superior and not come to the construction site. The procedure applied will then be the same as for employees who will be present in the morning with fever.
- The Contractor will ensure the transportation to health centers by liaising with the COVID-19 Hotline 1052 in case ambulances of the health centers are not available.
- PPE must be clean and for individual use only (they must not be shared, exchanged, or loaned between employees). Barrier/social distancing against COVID-19 must be applied during break times and meals. Drinking water materials for personnel such as a cup or water bottle must be available for all workers and must not be shared for use among workers. Anyone who is not an employee of the Contractor, or its service providers is a visitor. Any visitor wanting access to the site must submit to the same COVID-19 mitigation controls as employees.
- Cleanliness, including sanitization, of personnel reception facilities must be maintained regularly throughout the day. Any waste likely to be infected must be managed to avoid any risk of contamination. Given the type of works, there will be very minimal hazardous waste if not any.
- The Contractor will delimit the site and provide posters showing measures to be strictly followed by all who are on site.
- It is planned that about 20 people will be each work site. Workers must always wear masks, goggles, and maintain regular hand cleanliness. Hand sanitizers will be available in all strategic areas of the site.
- Equipment to take temperatures for all entering in the work sites should be available. Onsite, The Contractor will have three thermometers, regularly cleaned to avoid contamination. Taking of temperature and management of the thermometers should be the responsibility of the Contractor's ESHS officer.
- The contact information of the local COVID-19 committee (set up by the Ministry of Health under the Governor with all the relevant stakeholders in WCR) COVID-19 1025 Hotline will be communicated to all workers. The contact number will be posted on site. The Project will closely work with this committee to implement the Project in a safely manner.

In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below:

- All in person meetings (such as consultation meetings, focus group meetings, one on one interviews (respecting social distancing requirements, wearing masks and eye shields)
- Public notices
- Electronic publications and press releases on the MoHERST website, GTTI website, MoHERST TV show and relevant community radios in WCR
- Telephone Interviews

- Text messages communication
- Social media notices
- Posters erected in communities

At all times, the following COVID-19 mitigation measures will be followed in engaging with the public:

- Availability of hand sanitizers
- Thermometers onsite
- Social distancing of 1,5 meters between workers
- Not more than 20 people working on each faculty

Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions, such as committee of elders, women, youth, but also communication of religious leaders like imam and the griot (traditional communicators).

In the event none of the above means of communication is considered adequate for the required consultations with stakeholders, The Contractor should discuss with the PCU and GTTI to find out if the activity in question can be postponed at a later date, when significant stakeholder engagement is possible. When it is not possible to postpone the activity or when the postponement is likely to last more than a few weeks, the PCU or GTTI should consult the World Bank team for advice and guidance.

1.6 Conclusion

During all this process, recommended WHO hygienic practices will be respected and monitored by the PCU and GTTI safeguards team to ensure that mitigation measures would be properly followed and duly respected. As protocols and recommendations by the WHO changes in response to this pandemic, these protocols will be updated accordingly.

Annex 2: Chance Finds Procedures

This Chance Finds Procedure shall be applied in case previously unknown culturally valuable materials are unexpectedly discovered during the implementation of the Project:

- In the case of chance find of any material with possible archaeological, historical, paleontological, religious, or other cultural value, all work at and around the find, feature or site must immediately stop.
- The discovery will be clearly demarcated and secured from unauthorized access, and all found remains will be left where they were found. If necessary, artefacts will be protected and measures to stabilize the area will be implemented.
- Notify the Project Manager/PCU or Director General/GTTI of the findings who in turn will immediately notify the National Council for Arts and Culture for the necessary, assessment, recording and determination of the next course of action.
- Restart construction and public works only upon authorization of the relevant authorities (the National Council for Arts and Culture under the Ministry of Tourism and Culture).
- Relevant findings will be recorded in the Banks' supervision reports.
- These procedures must be referred to as standard provisions in construction contracts.

Annex 3: Grievance Mechanism

1. PURPOSE

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

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

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

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

Grievance escalation model

The Grievance Mechanism is designed with the objective of resolving disputes at the earliest possible time before they escalate. Project-affected persons should be heard and be able to voice concerns, and as such, they must have access to fair, transparent, and accessible means to address their concerns and views related to the project. Furthermore, the mechanism should be effective in addressing project complaints and concerns at project-level so that grievances are not referred through the court system for resolution, which is often not timely nor financially feasible or accessible to all. A functioning, inclusive and accessible grievance mechanism is essential for social sustainability of the project.

2. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

a. Human Resources and Implementation

The MoBSE PCU Environmental and Social Safeguard specialists (Hannah L. M. Njie and Maimuna A.M Sallah), will help the Environmental and Social Focal Points appointed at GTTI to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The Environmental and Social Focal Point at GTTI will be the Community Liaison Officers (CLOs) as the location of the site is in the urban area where monitoring will be frequent due to close proximity with the office. The two CLOs will act as key points of contact to bring project grievances from PAPs, stakeholders, construction workers, residents, and community members to the Grievance Redress Committee (GRC). The CLOs will be responsible for making sure the recommendations of the GRC are implemented through all phases of the project and direct contractors to make any appropriate adjustments to their works. The contractor shall take actions to address grievances.

b. Management Functions and Responsibilities

During the implementation phase of the Project, the grievance redress committee shall include:

- Establishing a Grievance Redress Committee (GRC). MoHERST will determine a sitting allowance for GRC members.
- Multiple grievance uptake locations and multiple channels for receiving grievances (for example: GTTI Director General Office, MoBSE PCU office, Gambia College Authorities, Students and houses affected in the communities).
- Fixed service standards (transparency, fairness, accountability, timeliness) for grievance resolution and adjudication process.
- Prompt and clear processing guidelines: including reviewing procedures and monitoring system (see flow chart on GM chapter).
- A time frame for responding to grievances (see flow chart on GM chapter).
- A reliable and effective reporting and recording system (grievance register, complaints logbook – both hard copy and e-copy).
- A clear and transparent procedure for assessing and responding to the grievance.
- Capacity building of both actors working in the GM and among contractors and community of how the GM works.
- Development of specific and separate survivor-centered GM procedures for the ethical and confidential management and resolution of GBV, including SEA, SH, and VAC complaints.

3. ROLES AND RESPONSIBILITIES

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

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

1. Developing and publicizing the grievance management procedures
 2. Receiving, reviewing, investigating, and keeping track of grievances
 3. Adjudicating grievances
 4. Monitoring and evaluating the fulfilment of agreements achieved through the grievance redress mechanism.
- b. **Community liaison officers (CLO):** GTTI office of the Director General will appoint as community liaison officers (CLO) two focal points: **an environmental focal point and a social focal point**. Their contact information will be published and communicated via public announcements and information sharing about the project, (radio, mosques, and community meeting etc.), to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The CLOs will act as the point of contact to bring project grievances from project affected people, construction workers, residents, and community members to the GRC. The CLOs will be responsible for making sure the recommendations of the GRC are implemented and directing GTTI office of the Director General during ESMP implementation, and contractors to make any appropriate adjustments to their works. The contractor shall take actions to address grievances.

In addition to the community liaison officer, the project will make available grievance forms at the Gambia College and nearby communities (Students, Governor’s office) as an accessible venue for filing a grievance. At least every week or two, Community liaison officers will collect forms filled out to submit them to the GRC.

To ensure confidentiality, the Project will enforce the implementation of the World Bank Codes of Conduct which will be filled out by the Projects’ staff prior to the starting of the Civil Works. The Project

will issue a code of conduct form to fill out by the Projects' staff, students, Gambia College Authorities, and liaison officers based on the World Bank Codes of Conduct. The PCU safeguards team will monitor closely the implementation of the codes of conduct by the Contractor and the Project.

c. **The contractor:** During the implementation, contractors, their staff, and all workers related with the Project must comply with the World Bank standards on Environmental, Social, Health and Safety (ESHS) and Occupational Health and Safety (OHS) in the workplace and conduct with affected communities. The application of a Code of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV, including SEA/SH and VAC. The Project and Contractors should make sure the Code of Conduct is signed, behaviors monitored, and adopted by those working on the project. The contractors are responsible for:

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

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

- Individual Code of Conduct: Code of Conduct for everyone working on the project, including Managers, Contractors, and GTTI staff.

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

For issues regarding SEA/SH and VAC-related claims, please see the procedures set forth below under Section 7 and the Response Protocol, which appears at Annex B.

The key objectives of the GM are:

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

The GM operates within the existing legal, cultural and community context framework of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling.

The details of each level of Grievance Mechanism are described as follows.

a. COMMUNITY LEVEL GRIEVANCE MECHANISM

Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, contractor, and or Government representatives at local and national level. In the context of the USET project, the College Authorities may be involved at this level. This may be more suitable for issues and concerns that are minor. For example, Gambia College processes were used to determine voluntary land donation as Authorities discussed among themselves to find suitable land for the USET and then proposed the sites to MoHERST to survey before final approval. This means the land was voluntarily donated by the Gambia College Authorities to GTTI for the construction of USET (the documentation to confirm this will be included in **Annex xxx** when it is received).

The community and contractor will be informed that the principle of non-discrimination and fairness, including gender equality, as per the Gambian Labor Law will apply in the selection. Also, if the company wants to compensate the community for using their sand, gravel or because of the impact of its activity (dust dispersion), those grievances can be solved at the community level, without the GRC, if the community chooses.

b. PROJECT-LEVEL GRIEVANCE MECHANISM

Many project-related grievances during the works are minor and site-specific. Often, they revolve around nuisances generated during construction such as noise, dust, vibration, workers disputes, etc. They can be resolved easily on site. If these types of grievances cannot be resolved on site, they will request the intervention of the Grievance Redress Committee, the Chief of the area, the Alkalo of the concerned community, the Governor's representative, and the Project (GRC), landowner(s) concerned, and if required, the representative from the Ministry of Higher Education Research Science and Technology and other ministries which can assist in solving the grievance.

Grievances and complaints related to GBV, including SEA/SH, VAC, as well as child labour, from workers, contractors, and/or community members during construction phase can be addressed by the specific procedures and protocols which have been outlined below and will ensure ethical and confidential management and resolution of these claims. Most grievances cannot be resolved immediately and on site, and in the case of SEA/SH-related claims, require specific and independent interventions and processes to protect the safety, anonymity, well-being, and preferences of survivors.

4. COMPOSITION AND MEMBERSHIP OF THE GRC

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

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

- Rep of National Environmental Agency
- Project Manager, PCU
- Social and Environmental Safeguards Specialists
- Physical Planning Regional Officer

- Brikama Area Council
- Representative of the Women’s Bureau
- Representative of Social Welfare
- USET Project Coordinator
- Governor’s Office to serve as Secretary of this Grievance Redress Committee

The GRC will include a non-permanent member of the affected community. For example, if the complaint comes from Gambia College, the Gambia College Authority will become non-permanent members during the GRC meeting to represent their community.

5. GM PROCEDURES for non-SEA/SH grievances.

The community will be informed and sensitized about the use of and existence of the GM (through radio notices, communities, community signage, Imam and with some awareness trainings by the Environmental and Social Safeguards Focal Points and the contractor prior to the starting of the Civil Works) and of the various uptake options where complaints can be submitted.

- The Uptakes will be for example, to the GTTI Director General’s Office. The GTTI safeguards team will meet every month to review all complaints.
- The complainants, within three days, will receive acknowledgement that complaints have been received and the procedures they must follow.
- The safeguards team will then organize a meeting for the GRC at the soonest to ensure compliance with the timeline for verification of the claim and responses to complainants.
- As a follow up and monitoring activity, if the identity of the person who submitted a grievance is known, the GRC must inform them within three days of the decision or when a decision is to be expected. If the complainant is not known, a notice that a grievance about a particular issue has been received will be posted within the community and the CLO will inform the community. The date of this outreach is to be logged into the grievance log.
- The GRC will commit decisions to be finalized within two weeks of date of receipt and feedback will be given to the complainants who will be notified and will record the complainants’ comments about decision. If the complainant is not satisfied, they will be notified about **escalation procedures**.
 - **Notices and signage** will be erected at all sites providing the public information on the Project and summarizing the GM process, including contact details of the relevant Project Contact Person, Contractor Liaison Officer or Community Liaison Officer. The GM will be accessible to all persons through at multiple uptake locations and the methods (grievance forms submitted to the Project, in person, telephone) or via the contractor or Governor’s office. All type of complainants should be free to lodge a complaint in one or as many of the uptake stations noted above.
 - **A Complaints Register for non-SEA/SH complaints (see Annex C)** at the GTTI Director General’s Office and the Office of the Head of Gambia College (since the Project will be implemented within the college premises), the office of the Governor of West Coast Region and also the contractor. Community Liaison Officer of the contractor, and the CLOs of the GTTI who will be trained, will log the complaints:
 - Details and nature of the complaint (include categorization of sensitive/urgent, non-sensitive and for all complaints unrelated to SEA/SH).
 - The complainant’s name and their contact details if known.
 - Date the complaint was received.
 - Corrective actions taken in response to the complaint.
 - The date the response was made available to the community (without identifying personal details) and the complainant.

- The resolution.
- The response of the complainant if response was acceptable to them or not.
- The name of the person who received the complaint and location/method the complaint was lodged. This information will be included in MOBSE PCU's progress reports to the World Bank. (See Annex C for sample grievance log).

Each two weeks or end of month, the CLOs will monitor all uptake stations to monitor the complaints register with Gambia College Authorities and Governor's Office.

- Escalation of Grievances If the complaint is not resolved to the satisfaction of the aggrieved party by the Grievance Redress Committee, it will then be referred by the MoBSE PCU Project Coordinator to the **National Steering Committee (NSC)**.

The National Steering Committee (NSC) is composed of:

Designation	Ministry
Permanent Secretary	MoHERST
Permanent Secretary	MoBSE
Permanent Secretary	MoFEA
Deputy Permanent Secretary (Programs)	MoHERST
Deputy Permanent Secretary (Admin)	MoHERST
Director General	GTTI
Human Resource Officer	MoHERST

Should measures taken by the National Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Gambia judicial court (District Tribunals or Magistrates Court).

6. JUDICIARY LEVEL GRIEVANCE MECHANISM

The project level process will not impede affected persons access to the legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of The Gambia. However, the quality and effectiveness of the judicial system should be assessed, as well as issues related to accessibility and affordability.

Table 1: The GM process

Flowchart of the ACE Impact Grievance Mechanism for non-SEA/SH complaints:



Stage	Process	Duration
1	The Aggrieved Party (AP) will take his/her grievance to the project or construction site supervisor (CSS)/Contractor Liaison Officer who will endeavor to resolve it immediately. Where AP is not satisfied, the CSS or CLO will refer the AP to the Project's Contact Person (PCP). For complaints that were satisfactorily resolved by the CSS/CLO, he/she will inform the PCP and the PCP will log the grievance and the actions that were taken.	Anytime
2	On receipt of the complaint, the Project PCP will endeavor to resolve it immediately. If unsuccessful, he/she then notifies PCU Project Coordinator	After logging grievance
3	The PCU Project Coordinator will endeavor to address and resolve the complaint by submitting it to the GRC and inform the aggrieved party after the Grievance Redress Committee has taken a decision regarding his/her complaint. If it is a land-related issue, the Project Coordinator and the GRC will advise the Director General, to engage the Ministry of Land and Local Government.	
4	If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level (GRC), the PCU Project Coordinator GTTI Director General, will then refer the matter to the National Steering Committee (NSC) for a resolution.	7 days
5	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the NSC, he/she is free to refer the matter to physical planning or the Ministry of Local Government and lands if it is a land matter.	Anytime
6	If it is a land related issue, the GTTI Director General may seek the assistance of the Physical Planning MD and Permanent Secretary of Ministry of Lands and Local Government.	Immediately after stage 3
7	If the issue remains unresolved, then the ultimate step will be for the Courts to deliberate on. Any such decisions are final.	Anytime

7. PROCEDURES FOR MANAGEMENT OF SEA/SH-RELATED COMPLAINTS

Step 1: Uptake (See Annex Intake-Registration Form in Annex E)

The Children's Act protects all the children in The Gambia without discrimination. The best interest of the child should be the primary consideration in any matter that affects or concerns a child. Everyone has a duty to report to either the Police or Department of Social Welfare, any case of child abuse or the violation of the right of any child that he or she knows about. It is against the law to sexually abuse or exploit a child in any form or even encourage it, to keep a brothel or allow a child to be in your brothel (The Children's Act 2005).

A complainant who wishes to lodge a SEA/SH-related grievance may use any trusted channel available to her or him to file a complaint with the project GM. The project has identified secure, confidential, and accessible entry points through which survivors will feel safe and comfortable making reports (e.g., telephone and toll-free number) service provider, community-based structure or Regional Monitors for SEA/SH cases etc.). Complainants may also use contractor grievance processes to file SEA/SH claims, but once filed with the contractor, the claims will be referred for verification to the project GM operator (The Social Safeguards Specialist) since they all work together.

A complaint intake form should be completed by the project GM operator through the various uptake channels listed above after having obtained the survivor's verbal consent to proceed with the grievance (See Annex D). The GM operator however will still obtain a written consent from the survivor to fill out the complaint intake form and to share information with the appropriate service providers if necessary. If the complainant has not yet been referred for services, the intake actor should confirm whether the survivor wishes to receive support, and if so, obtain the survivor's consent to be referred for appropriate care and connect the survivor with locally available providers or arrange for remote support where needed. Medical, psychosocial, and legal aid services should at least be made available, other services as well if possible (e.g., socio-economic, security and legal). The hard copies of the intake and verification forms will be stored in a safe and secure locker at the MoBSE Head Quarters whilst the soft copies will be stored on the computer of the GM Operator and locked with a password.

If the survivor chooses to be referred for services only and not to file a complaint, then the survivor's wishes must be respected; the service provider can then ask if the survivor consents to share basic case information in order to assist the project to track the cases that choose not to access the GM (See Annex D Informed Consent).

The survivor always retains the right to be referred for services whether or not there is a link established between the project and the incident in question.

Where selected, the actors are usually trained on how to receive and refer SEA/SH cases in accordance with survivor care principles, how to apply active listening techniques, and how to escalate complaints to the GM Operator safely and confidentially as they are illiterates. Any information collected about a survivor or the alleged perpetrator must be recorded and maintained separately from other grievance documentation, in a secure and lockable space, with strictly limited access.

Where a complaint is referred to the national level, the laws and procedures of the Judiciary System of the Gambia will be followed.

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

Step 2: Sort and process

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

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

Step 3: Acknowledge receipt

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

Step 4: Verification process (see Annex F on verification structure)

The verification process for a SEA/SH grievance will be handled by a separate structure established through the GM operator. The verification structure will be in the form of a committee, with five members, who will be recruited from MoHERST and GTTI. The team would comprise of five members which includes:

1. Representative from gender Unit at MoBSE
2. GTTI Gender Focal Point
3. The contractors' Gender Focal Point
4. The Social Welfare representative (Service Provider)
5. Construction Monitor.

The first three were selected because they have a background in handling gender-related cases whilst the fourth member represents the welfare of men, women and children. The fifth member frequently visits the Project Community to monitor the progress of the work and escorts visitors on site as he is the MoBSE Construction Monitor for the region. These members will be specially trained on the management and review of SEA/SH complaints, the importance of a survivor-centered approach, as well as guiding principles for survivor care and management of SEA/SH data and claims. If permitted by the survivor, a representative from a service provider should participate in the verification committee in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.

Once convened by the coordinator, the verification committee will review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The committee will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions per the code of conduct, type of incident, and the appropriate labor laws and regulations. Potential disciplinary sanctions for alleged perpetrators can include, but are not limited to, informal or formal warnings, loss of salary, and suspension or termination of employment. The committee must complete the verification process and render its decision within ten calendar days of receipt of the complaint.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the verification committee can make only its recommendations.

Members of the verification committee are also chosen in accordance with the following principles of:

- 1) Competence in their capacity to perform the committee's work;
- 2) Transparency in the choice of the committee members in accordance with clearly defined criteria;
- 3) Confidentiality of all involved parties, which must be respected by committee members; and
- 4) Impartiality of its chosen members, who can participate and perform their work without conflicts of interest.

Step 5: Monitor and evaluate

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

Step 6: Feedback to involved parties

Once the verification process has been concluded, the result of the process shall be communicated first to the survivor within 14 calendar days, ideally through the service provider if applicable, in order to allow the survivor and relevant advocates the appropriate amount of time to ensure adequate safety planning as needed. Once the survivor has been informed, the alleged perpetrator can be informed of the result as well.

If either party disagrees with the result, s/he is permitted to appeal the verification committee's decision via the GM appeals process and must file an appeal within 14 days of receipt of the verification result. This appeal will be filed to the PS (MoHERST) who will set up a committee who will deliberate further on the case.

For management and resolution of cases regarding SEA/SH and VAC, please see the above procedures set forth under Section 7.

ANNEXES FOR THE GRIEVANCE MECHANISM

Annex A: Code of Conduct for Implementing ESHS and OHS Standards Preventing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), and Violence against Children (VAC)

Annex B: Response Protocol for SEA/SH Complaints

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

Annex D: Survivor Consent Form

Annex E: Intake Form

Annex F: SEA/SH complaint verification Form

Annex G: Service Provider mapping

Annex H: The Gender Education Unit

IMPLEMENTING ESHS AND OHS STANDARDS

PREVENTING SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT, AND VIOLENCE AGAINST CHILDREN

Individual Code of Conduct

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC) is important.

The Ministry of Higher Education, Research, Science and Technology considers that failure to follow ESHS and OHS standards, or to commit acts of SEA/SH or VAC —be it at the office or the work surroundings—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or potential termination of employment. Prosecution by the Police of those who commit SEA/SH or VAC may be pursued if appropriate, and only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, SEA/SH and VAC as requested by my employer.
2. Will always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities which require safety precautions.
3. In the case of construction workers, take all practical steps to implement the contractor's environmental and social management plan (C-ESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can always impair faculties.
6. Consent to Police background check.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
10. Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
11. Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or

humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

12. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
13. I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
14. Consider reporting through the GRM or to my manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by the Ministry or not, or any breaches of this Code of Conduct.

- **With regards to children:**

1. Wherever possible, ensure that another adult is present when working in the proximity of children.
2. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
3. Not use any computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
4. Refrain from physical punishment or discipline of children.
5. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
6. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
7. Take appropriate caution when photographing or filming children.

- **Use of children's images for work related purposes**

When photographing or filming a child for work related purposes, I must:

1. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
2. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
3. Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
4. Ensure images are honest representations of the context and the facts.

5. Ensure file labels do not reveal identifying information about a child when sending images electronically.

- **Sanctions**

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training (increase dialogue and awareness training).
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of six months.
6. Termination of employment.
7. Report to the Police if warranted.
8. Fines (involve crime and serious human rights violations).
9. Suspended while investigations take place (to have clear evidence against the alleged perpetrator).

Reporting mechanism:

If I see and/or witness a case of SEA/SH misconduct as described in this Code of Conduct, or I am a victim of any prohibited behaviors, I can call the toll-free number (XXXX) or contact any SEA/SH focal points among the service providers, community-based structure, Community-based focal points or Regional SEA/SH Monitors. I can always contact the Social Safeguard specialist for guidance and information.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Witness Name: _____

Signature: _____

Address: _____

Date: _____

Annex B: Response Protocol for SEA/SH Complaints

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

Protocol objectives

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

Key terms and concepts

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

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

Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.⁹ Mistaken belief regarding the age of the child and consent from the child is not a defense in SEA of children. Sexual activity with individuals below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.¹⁰

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

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

¹⁰ The age of consent has important implications for workers employed on World Bank-financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such underage marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.

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

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

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

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

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

GBVIMS classifications

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

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

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

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

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

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

Psychological or emotional harm: infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, verbal harassment, unwanted attention, remarks, gestures, or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Guiding principles for survivor care

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

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

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

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

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

Types of survivor support services

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

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

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

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

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

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

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

Procedure for referrals or requests for assistance

❖ Reporting an incident

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

❖ Referring for services

Service referrals can happen in multiple directions:

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

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

❖ **Offer active listening;**

Provide basic information about locally available services;

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

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

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

Specialized providers that receive a report of SEA/SH must provide care to the survivor in accordance with international best practices and guiding principles for survivor care.¹¹ Holistic support from specialized providers includes case management, medical care, psychosocial support and mental health interventions, security options, and legal assistance. These actors must likewise be active listeners and provide all information about a survivor's available options, obtaining the survivor's informed consent first before proceeding. Specialized providers should also provide survivors, and/or their caregivers where needed, information about any mandatory reporting laws, if relevant in a particular context, before proceeding.

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

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

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

Annex D: Survivor Consent Form

Consent form: Both non-specialized and specialized actors must obtain informed consent from the survivor before proceeding with service referrals or information. Ideally, the survivor should read and sign a document that gives her or his consent to be referred for or to proceed with services as well as regarding sharing of limited case information. If the survivor is unable to read or write, the individual or provider can read the consent form aloud and the survivor can use a thumbprint to sign the document. Any such documentation must be maintained separately in a secure and locked area with strictly limited access.

Survivor Consent Form

We invite you to be interviewed about a case reported to our office concerning you. We assure you that strict confidentiality is essential and **MUST** be maintained at all times, except when you as the (survivor) or the (caseworker) faces imminent risk to your well-being, safety and security. You are also assured that your anonymity would be maintained wherever possible. All written information about you the (survivor) would be kept locked and secure from others. Safety and Security At all times, your safety as a survivor must remain paramount in our work.

For confidentiality, your answers will not be associated with your name. Rather, you will be given an identification number on the interviewer's sheet. We will make sure all risk associated to your safety is eliminated or minimized at all costs. You may opt to answer questions that you wish to answer. If you have any concerns or you are dissatisfied with any aspect of this interview you may report the grievances anonymously if desired to the Grievance Mechanism Committee.

If you think you are not comfortable with the location where the interview is proposed to be conducted, please you are free to ask for change of location as we want to ensure that you the (survivor) is not placed at risk of further harm by the aggressor, in all cases.

Freedom to Withdraw or Refuse Participation: I understand I have the right to stop the interview at any time, or to refuse to answer any of the interviewer's questions without prejudice from the interviewer.

Please feel free to ask the interviewer any questions before signing the consent form or at any time during or after the interview.

I understand that in giving my authorization below, I am giving (*Social safeguard Focal Point*) permission to share the specific case information from my incident report for the only purpose of accessing the GM

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the service I request. I understand that releasing this information means that a person from the verification committee may come to talk to me.

At any point, I have the right to change my mind about sharing information with the designated agency/focal point listed below.

Name: _____

Date: _____

Tel: _____

Signature _____

Signature of parent or guardian if the survivor is below 18:

Furthermore, I understand that in giving my authorization below, I am giving (*Social Safeguard Focal Point*) permission to share the specific case information from my incident report with the service provider(s) I have indicated, so that I can receive help with safety, health, psychosocial, and/or legal needs.

Name: _____

Date: _____

Tel: _____

Signature _____

Signature of parent or guardian if the survivor is below 18:

Intake Forms

Intake form: Specialized service providers that receive a case must fill out an intake form after obtaining survivor consent, which will assign an anonymous code to the survivor. During the interview, the provider should inform the survivor of the type of help that the provider can offer, including the advantages and disadvantages of receiving different services. Any intake and other case documentation must also be maintained separately in a secure and locked area with strictly limited access.

Annex E: Intake Form

SURVIVOR
CODE

STANDARD GBV INTAKE-REGISTRATION FORM

INSTRUCTIONS

- 1- This form must be filled out by the person providing services to the survivor
2- Remind the that all information will be kept confidential, and that they may choose not to answer any of the following questions.

Report Date*	Incident Date*	Staff Code (if available)	Report by Survivor*? <input type="checkbox"/> Yes <input type="checkbox"/> No
Survivor Information			
Survivor's Age*	Sex of survivor* <input type="checkbox"/> Female <input type="checkbox"/> Male	Specific Needs / Vulnerabilities* (check <u>all</u> that apply) <input type="checkbox"/> No <input type="checkbox"/> Physical Disability <input type="checkbox"/> Mental Disability <input type="checkbox"/> Unaccompanied Minor <input type="checkbox"/> Separated Child <input type="checkbox"/> Other Vulnerable Child	

Details of the Incident		
Area*^o	Sub-Area*^o	Village / Town
Type of incident/violence* (Please select <u>only ONE</u> of the below. Refer to the GBVIMS GBV Classification Tool for further clarification.) <input type="checkbox"/> Rape (includes gang rape, marital rape) <input type="checkbox"/> Sexual Assault (includes attempted rape and all sexual violence/abuse without penetration, and female genital mutilation) <input type="checkbox"/> Physical Assault (includes hitting, slapping, kicking, shoving, etc. that are not sexual in nature) <input type="checkbox"/> Forced Marriage (includes early marriage) <input type="checkbox"/> Denial of resources, opportunities or services (includes denial of inheritance, earnings, access to school or contraceptives, etc. Reports of general poverty should not be recorded.) <input type="checkbox"/> Psychological / Emotional Abuse (includes: threats of physical or sexual violence, forced isolation, harassment /intimidation, gestures or written words of a sexual/menacing nature, etc.) <input type="checkbox"/> Non-GBV (specify) _____ _____ _____		<ol style="list-style-type: none"> Did the reported incident involve penetration? If yes → classify the incident as "<u>Rape</u>". If no → proceed to the next incident type on the list. Did the reported incident involve unwanted sexual contact? If yes → classify the incident as "<u>Sexual Assault</u>". If no → proceed to the next incident type on the list. Did the reported incident involve physical assault? If yes → classify the incident as "<u>Physical Assault</u>". If no → proceed to the next incident type on the list. Was the incident an act of forced marriage? If yes → classify the incident as "<u>Forced Marriage</u>". If no → proceed to the next incident type on the list. Did the reported incident involve the denial of resources, opportunities or services? If yes → classify the incident as "<u>Denial of Resources, Opportunities or Services</u>". If no → proceed to the next incident type on the list. Did the reported incident involve psychological/emotional abuse? If yes → classify the incident as "<u>Psychological / Emotional Abuse</u>". If no → proceed to the next incident type on the list. Is the reported incident a case of GBV? If yes → Start over at number 1 and try again to reclassify the incident (<i>If you have tried to classify the incident multiple times, ask your supervisor to help you classify this incident</i>). If no → classify the incident as "<u>Non-GBV</u>".
Were money, goods, benefits, and / or services exchanged in relation to this incident*?		<input type="checkbox"/> No <input type="checkbox"/> Yes
Has the survivor reported this incident anywhere else*? (If yes, select the type of service provider and write the name of the provider where the client reported). <input type="checkbox"/> No <input type="checkbox"/> Yes (specify) :		

Alleged Perpetrator Information		
Number of alleged perpetrator(s)* <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> More than 3	Alleged perpetrator sex* <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Both Age* <input type="checkbox"/> Adult <input type="checkbox"/> Minor <input type="checkbox"/> Adult & Minor	Main occupation of alleged perpetrator (if known) <input type="checkbox"/> Farmer <input type="checkbox"/> Police <input type="checkbox"/> Soldier <input type="checkbox"/> Security Official <input type="checkbox"/> Teacher <input type="checkbox"/> Parent <input type="checkbox"/> NGO Staff <input type="checkbox"/> Religious / Community Leader <input type="checkbox"/> Other / Unknown <input type="checkbox"/> Unemployed <input type="checkbox"/> Any other individual associated with the project

Annex F: SEA/SH complaint verification Form

Introduction:

This form should guide the verification process by the verification structure/committee. The verification structure will be in the form of a committee, with five members, recruited from MoBSE. If permitted by the survivor, a representative from a service provider should participate in the verification committee in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.

The verification committee is tasked to review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The committee will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the verification committee can make only its recommendations.

Section A:

Has the survivor provided his/her informed consent to access the grievance mechanism?

Yes No

IF YES, please complete the form in its entirety.

IF NO, please seek the consent of the survivor only to anonymously share 1) the survivor code, 2) the type of incident reported and the date and area of the incident, 3) the alleged perpetrator's connection to the project (if known), and 4) the age and gender of the survivor.

Explain that this information will only be used by the project for the purpose of gathering information on the risks created by the project to the safety and well-being of women and girls in their communities and to take steps to mitigate these risks. No data specific to the incident in question, including the identity of the victim, specific location, etc., will be shared outside the provider.

Has the survivor provided his/her informed consent to share the abovementioned information?

Yes No

If YES, please fill out below only Section B.2; B.2; B.3

If NO, please do not fill out the rest of the form.

Section B:

1. INFORMATION RELATED TO THE GRIEVANCE RAISER/GBV SURVIVOR

Survivor Code:

Age and sex of the GBV survivor:

Girl (<18)

Woman (>=18)

Boy (<18)

Man (>=18)

2. INFORMATION RELATED TO THE SEA/SH ALLEGATION:

Time, area and date of incident reported by the survivor:

GBV Type (classification GBVIMS):

Rape

Sexual aggression

If relevant, please specify:

Sexual exploitation and abuse

Sexual harassment

Physical aggression

Emotional and psychological violence

Forced marriage

Denial of resources and opportunities

Has the survivor received any services? Yes No

If yes, please specify:

Medical

Psychosocial

Legal

Security/protection:

Other please specify:

3. INFORMATION REGARDING THE LINK TO THE PROJECT:

This session aims to determine whether the incident is linked to the project and if the alleged perpetrator is hired or is associated to the project

Is the alleged perpetrator linked to the project?

Yes

Non

Do not know

Name of the alleged perpetrator (if known):

Role of the alleged perpetrator (if known):

Farmer

Teacher

NGO staff

Parent

Police

Soldier

Security official
Religious/community leader
Any other individual associated with the project
Not known

Has the incident been confirmed as credible after verification?
Yes No Verification ongoing

End date of the verification process:

Decision taken:

No action/sanction
Informal warning
Formal warning
Additional training
Loss of salary
Suspension of employment
Layoff with notice
Layoff without notice
Report to the police if warranted
Fines
Other actions

Please specify:

Date of notification to the perpetrator's employer/contractor:

Date of notification to the GBV survivor:

Notification of the implementation of the decisions/sanctions: yes No

Notification to the MOBSE PCU yes No

Notification to the World bank (*the verification structure needs only share the nature of the case, the age and sex of the complainant -if known-, whether there is a link with the project, and whether the survivor has been referred for services*)
yes No

Note below any follow-up communication with the survivor:

For example: When/if a verification has begun, or the allegation has been determined to have an insufficient basis to continue. It may also include concerns raised by the victim through the verification process.

Annex G: Service Provider mapping

LIST OF SOCIAL WORKERS in the Affected REGIONS WITH THEIR CONTACTS

DEPARTMENT OF SOCIAL WELFARE

No.	NAME	INSTITUTION	REGION	CONTACT	Hours of service
1.	Isatou Bah	DSW (Department of Social Welfare)	Greater Banjul and KM (Kanifing Municipality – Region One	7153177	
2.	Haruna Badjie	DSW (Department of Social Welfare)	West Coast Region – Region Two	3756247	

LIST OF NGBV (Network against Gender Based Violence) ONE STOP CENTRES FOCAL PERSONS PER REGION WITH THEIR CONTACTS

NO	NAME	INSTITUTION	REGION	CONTACT	Hours of service
1.	Mamadou Jallow	EFSTH (Edward Francis Small Teaching Hospital	Banjul Region One	3706720	
2.	Dr. Babanding Daffeh	Serekunda General Hospital	KM (Kanifing Municipality – Region One	2744775	
3.	Aisha Minteh/Dr. Stephanie	Bundung	KM (Kanifing Municipality – Region One	3953558/3233013	
4.	Fatimah Jaiteh	Brikama	WCR (West Coast Region) Region Two	7738138	

LIST OF POLICE COMMISSIONERS IN AFFECTED REGIONS WITH THEIR CONTACTS.

No.	Name	Institution	Region	Contact	Hours of service
1.	Commissioner of Police Alhagi Kinteh	Police Medic	Banjul – Region One	3912113/991 2113	
2.	Commissioner of Police Lala Camara	Banjul Headquarter	Banjul – Region One	9988168	
3.	Commissioner of Police Adlime Basangeh	PIU (Police Intervention Unit)	KM (Kanifing Municipality – Region One)	2508276/996 3032	
4.	Commissioner of Police Amadou Sabally	Kairaba Station	KM (Kanifing Municipality – Region One)	3950922	
5.	Commissioner of Police Famara Jallow	Brikama	WCR (West Coast Region) Region Two	9966077/214 5231	

NB: For Police Headquarter in Banjul, the Gender and child welfare officers are under the purview of the Assistant Inspector General of Police (AIG) Demba Sowe. Tel: 7763010.

What to do when services are not available: If complete services are not available in a particular intervention zone, the survivor should still be informed of what services are or are not available and how remote support might be offered if that is an option. It is important that a survivor’s expectations in relation to service availability be managed realistically.

Working with child survivors: In cases involving minors, actors specialized in child protection should be involved and integrated into the referral pathway. Children have the right to be consulted directly about their case as well as to receive all available information that is necessary to help them decide upon a particular course of action, in accordance with their age and stage of maturity and cognitive development. Wherever appropriate, parents or caregivers should also be involved in the case management process, and children have the right to let a service provider know the adult in whom the child places the most trust and confidence. If the alleged aggressor is a member of the family, it is extremely important that any interview with the child take place outside of the family unit and in the presence of an adult whom the child trusts. A child’s capacity to provide consent with regard to services or information-sharing will depend upon the child’s age, level of maturity, and ability to express him or herself freely; the best interest of the child should also be taken into account.

Everyone has a duty to report to either the Police or Department of Social Welfare, any case of child abuse or the violation of the right of any Child that he or she knows about. It is against the law to sexually abuse or exploit a Child in any form or even encourage it, to keep a brothel or allow a child to be in your brothel, (The children’s Act 2005). For the benefit of the USET project, there are SEA/SH Focal Points would be identified within project sites who will work directly with the MoBSE Safeguard Team and GTTI Safeguards Focal Points. In addition, they would be train on how to handle and report SEA/SH cases especially when it involves a child survivor. All referrals are done by using the numbers of contacts indicated in the GM referral pathways and that of the GM Operator’s number (for the most up-to-date information, please consult the Safeguard Team at MoBSE, PCU).

Payment for survivor services: The GM operator will arrange for payment of survivor support costs for project-related claims that are not otherwise covered through public services, such as government health or social service centers, including transport costs to ensure access to needed services. In order to facilitate this coverage, the project may need to enter into partnership arrangements with certain service providers for the life of the project.

Information and data management: With regards to management of SEA/SH-related data, all documentation related to any SEA/SH case must be filed and maintained separately, in a lockable space, with access that is strictly limited. All guiding principles regarding confidentiality and the secure and ethical collection of data must be respected, and any identifying information about a survivor or the alleged aggressor must never be included in any reports regarding SEA/SH cases for the project. Any project personnel responsible for collecting data related to SEA/SH cases must be trained on proper data collection methods and relevant guiding principles, especially surrounding survivor confidentiality and safety.

The project may need to enter into information-sharing agreements with certain service providers in order to ensure the ethical and confidential reporting and sharing of case data. Generally speaking, any data-sharing should be limited to information regarding the nature of the incident, whether the alleged aggressor is linked to the project, the age and sex of the survivor (if known), and whether the survivor was referred for services, and only with the informed consent of the survivor.

Community Sensitization

Information regarding the management procedures for SEA/SH claims and available services must be disseminated regularly within project-affected communities (service-mapping information must therefore be available prior to organizing community awareness-raising sessions or consultations). Community members should be informed about the following:

Entry points to seek help safely and confidentially, whether for services and/or to file a complaint;

Available services in the community and how to access them;

What to expect from service providers, including counter-referrals, as well as the roles and responsibilities of different actors; and

The existence of any mandatory reporting laws, especially in the case of SEA/SH or VAC, so that any survivors or their caregivers are aware of these regulations before deciding whether to seek support from a service provider that may be required to report.

Annex 4: The list of community representatives consulted

No	NAME	DESIGNATION	ADDRESS	TEL. NO
1.	Mouhamed Jaiteh	Director	Forestry Department	9879695
2.	Edward Mansal	Director	GTTI	9902853
3.	Lamin Sanneh	Governor	West Coast Region	9962920/7162854
4.	Yusupha Jobe	Deputy Registrar	Gambia College	3919798
5.	Alhagie Nget	Student Union President	Gambia College	3812144
6.	Benedict Jarju	Standards & Quality Manager	NAWEC	9962496
7.	Omar Sanneh	Water Distribution Engineer	NAWEC	9965712
8.	Abubacarr Jallow	Principal	Gambia College	9971741
9.	Lamin Camara	Senior Programme Officer - EIA	NEA	3223312
10.	Mod A K Secka	Permanent Secretary	MoHERST	7767820
11.	Awa Senghore	Acting Permanent Secretary	MoGCS	9899764
12.	Bintou Fatty	Director – Children’s Affairs	MoGCS	3201242
13.	Nenneh Touray	Rep. for Women’s Bureau	MoGCS	9917338
14.	Modou Sumareh	Rep. for Social Welfare	MoGCS	3681775
15.	Saikou M. Fatajo	Program Manager	MoH	3953706