Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 06/18/2020 | Report No: ESRSA00894
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
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<tbody>
<tr>
<td>Sudan</td>
<td>AFRICA</td>
<td>P174220</td>
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</tr>
</tbody>
</table>

Project Name: Sudan Education COVID19 Response

Practice Area (Lead): Education
Financing Instrument: Investment Project Financing
Estimated Appraisal Date: 5/25/2020
Estimated Board Date: 7/23/2020

Borrower(s): Ministry of Finance and Economic Planning
Implementing Agency(ies): Ministry of Education

Proposed Development Objective(s):
To support learning continuity during the COVID-19 pandemic school system shutdown and transition back to school during recovery.

Financing (in USD Million):

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>Amount</th>
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<tbody>
<tr>
<td></td>
<td>15.00</td>
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</tbody>
</table>

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?
Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed project design will support Sudan Ministry of Education to: (a) launch an urgent response to support students and teachers engagement during the COVID-19 pandemic and school system shutdown; (b) use of most common media of communication for distance learning such as radio, television, newspapers and mobile phones; (iii) facilitating engagement of students through assignments that will be graded by teachers; and (iv) mobilizing teachers to interact with parents and students in distance education, assessing students' assignments and reporting the results.
D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Since mid-March, the Government of Sudan has taken several measures to control the spread of COVID-19. These started with a declaration of a health state of emergency and closing of Khartoum international airport, permitting only humanitarian, medical emergency and some cargo flights. Land and sea borders are also closed. All schools and markets have also been closed, with all public gatherings, such as weddings and social events banned.

The Sudan Education COVID-19 Response Project will provide support throughout the country, national coverage on learning continuity during the COVID-19 pandemic and school system shutdown in Sudan and transition back to school during recovery. Overall, the project will depend on virtual delivery of education and social campaigns through digital and mass-broadcasting tools which are expected to be limited to existing school compounds. The project resources will be used to strengthen/complement support provided under the Sudan Basic Education Emergency Support (P172812). Approximately 5.4 million students will benefit from the Project through distance learning programs broadcasted through radio. Approximately 100,000 target households and 430,000 children in those families will also benefit from provided resources such as radios and solar power chargers. 33,000 teachers will benefit from training in using distance learning methods and using hardware (tablets) and software for data collection. Approximately 420,000 students, including 223,000 girls, will benefit from water provision in schools.

Sudan has considerable geographical diversity and as a result, is endowed with great diversity of plant, animal and microbial genetic resources. No major civil works are expected in this project, and any works such as provision of water tanks will take place in existing facilities. As result, the project is not expected to endanger natural habitats or cultural sites.

D. 2. Borrower’s Institutional Capacity

The Federal Ministry of Education (MoE) is the implementation agency for this project. Within the Federal MoE, there is an existing Project Implementation Unit (PIU) which will hold responsibility for carrying out monitoring and reporting of the utilization of the Sudan Education COVID19 project resource management for the intended purpose. The Program Coordination Unit will cover functions such as planning, procurement, financial management, environmental and social risk management, and monitoring and evaluation. The PIU is supported by a senior civil engineer (SCE) as well as a social mobilization and grass-roots capacity building/school grant coordinator specialist, to carry out environmental and social risk management, respectively. National institutional capacity require continuous support to ensure adherence to the environmental and social principles and policy intents. The PIU has a history of engaging with State Ministry of Education and local communities to build capacity. There is a component in the project dedicated to funding capacity building, especially for the new States being added from the Sudan Basic Education Recovery Project (P128644) and Sudan Basic Education Emergency Support (P172812). Since the scope of the project is expanded throughout the country, it requires a local level conflict screening (this is a one pager screening checklist used to assess the potential conflict issues in different parts of Sudan by the Parent project during classroom and school construction. Given the newspapers and the assignment sheets will be picked up and dropped in this schools, the project should pay attention to the prevailing contextual risk of conflict and safety situation in the specific locality) to determine the potential risk of student and teachers safety during collecting news papers, assignment blank sheets and dropping assignments at school locations. The screening results will rely on the social cohesion works through the Parent Teacher Associations and the school community who will be managing the school grants for COVID19 response.
As the project is entering into a virtual delivery of education and social campaigns through digital and mass-broadcasting tools which are expected to be limited to existing school compounds, it may require commensurate capacity building for the environment and social staff to adequately understand the media, message and monitoring feedback, documenting and reporting. Further, the project will leverage the different NGOs working on the Sudan Basic Education Emergency Support (P172812) school grant management for providing training and reporting for the Sudan COVID19 Education project (P144220) in the respective areas these NGOs are working.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating  Moderate

The project resources under component one will be used to finance learning continuity through TV, radio, and newspapers through, (i) production and dissemination of TV and radio education broadcast and newspaper education inserts, (ii) engagement of students and teachers in the learning continuity programs by using both radio and newspaper-broadcast, assignments in Math and Reading will be developed to engage students in the learning process (where appropriate, mobilize the participation of community teachers, support the provision of tablets for teachers (two per each public school) to mark the assignments and transfer the results), (iii) provision of resources (radios and equipment) to the poorest, via provision of radios and solar power banks to target households by targeting communities with schools without electricity and the lowest learning outcomes (bottom 20 percent) and supply of water storage tanks (1,000 L) for schools lacking water storage facilities to help in hand washing and hygiene once the schools are open.

The environmental risks are largely associated with potential waste disposal issues of the tablets for teachers (two per each public school) to mark the assignments and transfer the results), radios and solar power banks to targeted households, newspaper education inserts and the supply of water storage tanks (1,000 L) for schools lacking water storage facilities. These risks could be mitigated through, among others, proper e-waste management, including recycling of batteries for radios and solar power bank and proper design of hand-washing facilities and sewerage runoff. The implementation of these mitigation measures will be guided by the updated ESMF of the Sudan Basic Education Emergency Support (P172812). Considering the potential risks and mitigation measures, the environment risk rating could be considered as moderate. This risk rating can be changed later during implementation according to a re-assessment of the environmental risks.

Social Risk Rating  Moderate

Regarding social risks, the potential positive benefits outweigh the negative impacts. These include, continued engagement of students nation wide on course in their education pursuit, targeting diverse student groups. The project uses different media, television for urban and peri urban areas with internet penetration, radio for areas which are not covered by the television and newspaper for areas not covered by both radio and television. The newspapers have a thirty six hours delivery time throughout the Sudan. Thus, the hierarchy of media use, time required for news paper delivery demonstrates the projects effort to ensure inclusion of diverse geographic areas throughout the country. The media choice is intended for ensuring coverage of penetration of different media and reaching out people with disability (visual impairment through radio, hearing impairment through news paper and television subtitles), enhancing coverage through provision of radios and solar power banks to target households by targeting
communities with schools without electricity and the lowest learning outcomes (bottom 20 percent, nearly about 100,000 households). The national center for curriculum research is in charge of content development for radio, television and newspaper. The curriculum research NCCER will ensure adequate coverage and representation of the linguistic and cultural diversity in Sudan including potential options broadcasting at national and local radios and TV stations having local stations providing explanations and program details in local languages.

The Social Risk Rating is considered moderate as the project may mobilize and support voluntary teachers in schools across Sudan, including conflict affected areas where the contextual risk to the project is considered moderate. The social risk emanate from, (i) limited resources may not allow the project to reach all students and schools in the country, (ii) targeting challenges for the distribution of radio and solar power banks, (iii) students learning variation in Arabic verses their mother tongue, (iv) pastoral students may miss out lessons due their nature of livelihoods and mobility with parents. Other social risks include; (i) selection bias where project interventions such as school scholarships and mentor ships get diverted to ineligible and less-deserving and are used in locations and on individuals who are easier to access, rather than the most needy; ii) sexual exploitation and abuse, sexual harassment (SEA/SH) and other forms off gender-based violence (GBV) of learners and project staff arising from exploitation of women and girls for project benefits or by including supporting girls to attend schools where they are at risk of abuse. The risk mitigation measures will encompass, inclusion of sanitary pads as eligible expenditure for the school grants and prepare SEA/SH prevention and response Action Plan that will mitigate the potential SEA/SH/GBV risks to learners, teachers and school community. The social risk mitigation measures include, (i) undertaking robust stakeholder engagement, (ii) using third party (NGOs) to implement the selection of communities for accessing radio and solar distribution in conflict affected areas, training and reporting, (iii) prepare labor management plans which will help to manage the potential labor related risks, (iv) provision of 1000 liter water tankers for 1647 schools will improve the hygiene of students, teachers and communities, (v) dispatching of sanitizers and soap will improve community health and hygiene, (vi) prepare SEA/SH prevention and response Action Plan that will mitigate the potential SEA/SH/GBV risks to learners, teachers and school community, (vii) distribute 100,000 hand-held solar powered radios to poor and households in remote areas and pastoralist students. The television, radio and newspaper contents should be developed to foster inclusion in a manner that reflects diversity.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Expected negative environmental impacts may include, but are not limited to the following: waste disposal issues related to (i) the provision of tablets for teachers (two per each public school) to mark the assignments and transfer the results), (ii) provision of resources (radios and equipment) to the poorest, via provision of radios and solar power banks to target households by targeting communities with schools without electricity (iii) newspaper education inserts, and (iv) installation of 1000L water tanks in 1647 schools lacking water storage facilities to help in hand washing and hygiene. The mitigation measures include: (a) proper e-waste management, including recycling of batteries for radios and solar power banks, (b) proper design of hand-washing facilities and sewerage runoff, (c) awareness creation to the school community, by working with radio channels at the national, state, and locality levels during peak hours to deliver hygiene messages and promote hand washing. Proper waste management, including e-
wastes, will be guided by the updated ESMF of the Sudan Basic Education Emergency Support (P172812) and will be part of the environmental monitoring system of the PIU.

Expected negative social impacts may include, but are not limited, to the following: (i) omission of disadvantaged and vulnerable groups in the locality and school targeting process for radio and solar distribution; (ii) challenges in voluntary teachers recruitment and selection; (iii) differential accessibility to distance education through television, radio and newspapers in isolated, pastoral and rural communities; (iv) limited enrollment of girls due to inadequate latrines and/or societal pressures in some States, (v) increased gender based violence, sexual abuse and work load on girls to productively pursue their education.

The risk mitigation measures will rely on (i) target communities for radio and solar power banks for schools without electricity and the lowest learning outcomes (bottom 20 percent) using the national school database which has geotagged locations of schools with basic amenities; (ii) adhere to transparent and community vetted recruitment and mobilization process for voluntary teachers including using the stakeholder engagements at the community level, (iii) regularly assess the effectiveness of the media to ensure no one is left out for the distance education, (iv) protect girls and vulnerable children, as they spend months out of school and mitigate the heightened risk of early marriage and use radio and other technologies to promote safeguarding and health messages, supplemented by human interaction with their teachers or other community leaders, through improving child safeguarding by promoting parental participation in television and radio learning, (v) ensure the schools for dropping assignments are safe for pupil and their parents. Further, key messages, that are not covered on social aspects will be included to enhance conflict mitigation measures and provide adequate risk mitigation measures and building social cohesion. The Social Assessment which will be prepared to understand the context of IPSHUTLC in Sudan and inform the implementation of this project and the design of parent project (P167169) under preparation will be used to frame the distance learning content development.

ESS10 Stakeholder Engagement and Information Disclosure

The project has updated the stakeholder engagement plan prepared for the Sudan Basic Education Emergency Support (P172812), relaying on the stakeholder mapping for Sudan Basic Education Project (P167169). The type of stakeholder in this project encompass direct implementing agencies, partners, interested parties/contracted service providers, development partners, funding to direct beneficiary communities, teachers, and students.

There will be continuous stakeholder engagement by the MoE, State Education Offices, implementing entities (radio and television stations, newspaper; such as, partner NGOs implementing the Sudan Basic Education Emergency Support (P172812), Development Partners (UNICEF, EU, DFID). The full set of stakeholders are listed in the SEP plan with the respective feasible engagement channel (radio, television, newspaper, internet, school level small group meeting), engagement at the different levels of the administration (National, State, locality and school) and responsible entity (MOE, State MoE, Schools, PTAs). The proposed distance education media television, radio and newspapers will be used to share project message and serve as one platform for stakeholder engagement. The project social mobilizers will closely work with the school level Parent Teacher Association (PTA) in the process of stakeholder engagement and community consultation. The project will ensure that the GRM is designed to be responsive to SEA/SH and to address concerns and complaints promptly and transparently with no cost or discrimination towards project affected communities, students and teachers.
B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The proposed project updated the Labor Management Procedure prepared for Sudan Basic Education Emergency Support (P172812). MoE will ensure that standard working procedures for teachers is adopted with a code of conduct, the contractors for the distance education. The workers of the third party non-government organizations will adopt a code of conduct that govern their work in schools during the delivery of the school grants. The management of volunteer teachers and their code of conduct in school will be defined in the LMP, if the need arise for mobilization of volunteer teachers for this project. A labor management procedure will be accompanied by a set of Occupational Health and Safety (OHS) procedures to be incorporated into the contracts for civil works.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant due to the potential waste disposal issues related to the delivery of the tablets, radios and solar power banks, newspapers education inserts, and water tanks to schools under the project. The water tanks will be installed in existing schools so that they can be accessed more easily and safely by students, teachers and administrators, and will use a stand of multiple faucets rather than a communal bucket of water. The parent project ESMF update will include specific assessment of the water pollution prevention risks from the proposed water supply and sanitation works. Regarding the potential e-wastes from the supply of radios and solar power banks, re-cycling of batteries will be encouraged. Proper waste management, including e-wastes, will be guided by the updated ESMF of the Sudan Basic Education Emergency Support (P172812) and will be part of the environmental monitoring system of the PIU.

ESS4 Community Health and Safety

The use of distance learning media, could be cultivated to promote social cohesion, communicate COVID19 prevention and control messages, ensuring also, completed assignment drop location could not exacerbate conflict in school areas. MoE, the State Ministry of Education, and NGOs involved in the implementation of the project will have a code of conduct which outlines their respective workers relationship with communities, school community and students. At the community level, the project will work to protect girls and vulnerable children, especially girls – as they spend months out of school and mitigate the heightened risk of early marriage and sexual exploitation and abuse. Girls are more likely to end up doing household chores and might not return to school. The project will use, radio and other technologies to promote safeguarding and health messages, supplemented by human interaction with their teachers or other community leaders, could help protect adolescent girls from sexual abuse, violence, and pregnancy. One way to improve child safeguarding is promoting parental participation in radio learning. Risks related to sexual exploitation and abuse, sexual harassment (SEA/SH) and other forms for gender-based violence (GBV) to women and girls are a conceivable possibility. Mitigation measures include, (i) reliance on the Code of Conduct to ensure avoidance of any form of SEA/SH; (ii) publicly post or otherwise disseminate messages in the school and in the community clearly prohibiting SEA/SH and raising awareness on the GRM, (iii) ensure information is made available to the GBV services available including the hotline (mentioned above), (iv) conduct regular safety audits with learners.
to assess and manage the risks of SEA/SH and other forms of GBV extending from project activities. A SEA/SH Prevention and Response Action Plan will be drafted and included in the project ESMF.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
This ESS is not relevant at this stage based on the proposed use of the project resources.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
This ESS is not relevant at this stage based on the proposed use of the project resources.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
The project will be implemented throughout the country. The project will benefit all schools and students including people who meet the requirements of the Indigenous Peoples/Sub-Saharan African Historically Under-served Traditional Local Communities (IPSHUTLC) standard. Thus, the IPSHUTLC issues are intended to be mainstreamed into the project design as it will cover schools and students nation wide. However, given this project is being prepared under emergency procedures, it is not possible to develop a Social Assessment prior to Appraisal. As such, the Project will benefit from the preparation of a Social Assessment under the Sudan Basic Education Emergency Support (P172812) to understand the context of IPSHUTLC in Sudan and inform the implementation of this project and the design of the parent project (P167169) under preparation. If the SA has findings which are materially significant to the IPSHUTLC in Sudan, the project will adopt mitigation measures to address these shortcomings.

ESS8 Cultural Heritage
This ESS is not relevant at this stage based on the proposed use of the project resources.

ESS9 Financial Intermediaries
This ESS is not currently relevant.

B.3 Other Relevant Project Risks

Security in Sudan continues to be volatile particularly in conflict affected areas. It will thus be important that communication outreach as well as operation of project activities takes this into account. Non-government organizations may get involved in the implementation of the project in active and conflict affected areas for the delivery of trainings on distance education and reporting. These are not new NGOs, the project will leverage those who will be working for the Sudan Basic Education Emergency Support (P172812) grant delivery approved by the Bank in April 2020. The project will undertake conflict sensitivity analysis not to exacerbate conflict and enhance social cohesion. The community and Parent Teacher Association consultations will provide venue for promoting social cohesion. The PIU shall, in close coordination with other government agencies, monitor any worsening security situation. In such cases it will be important that the client informs the World Bank accordingly.
### C. Legal Operational Policies that Apply

**OP 7.50 Projects on International Waterways**

No

**OP 7.60 Projects in Disputed Areas**

No

### III. BORROWER'S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

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<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
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<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td>08/2020</td>
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<td>Updated ESMF prepared and disclosed for Sudan Basic Education Project (P167169).</td>
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<td>ESS 10 Stakeholder Engagement and Information Disclosure</td>
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<td>Stakeholder Engagement Plan</td>
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<td>ESS 2 Labor and Working Conditions</td>
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<td>Labor Management Procedure</td>
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<td>ESS 3 Resource Efficiency and Pollution Prevention and Management</td>
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<td>ESS 4 Community Health and Safety</td>
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<td>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</td>
<td>09/2020</td>
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<td>The SA which will be prepared for Sudan Basic Education Project (P172812) will be used to mitigate the potential social issues for the Sudan COVID19 project.</td>
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<td>ESS 8 Cultural Heritage</td>
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<td>ESS 9 Financial Intermediaries</td>
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B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?  No

Areas where “Use of Borrower Framework" is being considered:
N/A

IV. CONTACT POINTS

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Borrower/Client/Recipient
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Implementing Agency(ies)
Implementing Agency: Ministry of Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Thanh Mai, Omer Elseed
Practice Manager (ENR/Social) Robin Mearns Cleared on 08-Jun-2020 at 15:43:9 EDT