Government of the Kingdom of Eswatini

MINISTRY OF EDUCATION AND TRAINING

Strengthening Early Childhood Development and Basic Education Systems to Support Human Capital Development in Eswatini

Project number – P173151

DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

November 2021

STRENGTHENING EDUCATION AND TRAINING SYSTEMS PROJECT

DRAFT OF ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Prepared for:

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The Eswatini Ministry of Education and Training

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EXECUTIVE SUMMARY

Introduction

The Ministry of Education and Training (MoET) in the Kingdom of Eswatini (KoE) is planning to undertake a project to strengthen human capital development. Funding for the project will be through a loan facility from the World Bank. The Project Development Objective (PDO) is to strengthen education service delivery and management systems to provide quality ECCDE, primary and junior secondary education, and pilot initiatives to improve junior secondary retention in targeted areas.

One of the requirements for funding of this project was for the Ministry to assess the environmental and social risks of the project. Since the specific project sites have not yet been determined, an Environmental and Social Management Framework (ESMF) needs to be developed to ensure environmental and social sustainability of this project.

This project is in line with the country's development priorities which are aligned with global development goals.

The project has four (4) components, as outlined in the table below.

Component 1: Strengthen coordination and regulation of ECCDE and improve quality of ECCDE services	1.1: Strengthen systems to improve ECCDE service delivery
	1.2: Improve the quality of ECCDE services in targeted centers
Component 2: Improve quality and internal efficiency in basic education	2.1 Improve literacy and numeracy in the early grades
	2.2: Improve the quality of Mathematics and Science instruction in secondary education
	2.3: Improve retention in secondary education
Component 3: Project Management, Capacity Building and Technical Assistance	3.1: Project Management, Capacity Building and Technical Assistance
Component 4: Contingent Emergency Response Component	

Overall Objectives of the ESMF

This Environmental and Social Management Framework (ESMF) has been prepared in order to guide the PIU team as well as project planners, implementers and other relevant stakeholders to identify and mitigate environmental and social impacts for the Strengthening of Early Childhood Development and Basic Education Systems to support Human Capital Development Project in Eswatini. The PIU is responsible for ensuring all implementing agencies and other actors are aware of and understand the contents of the ESMF.

The ESMF was prepared taking into account World Bank Environmental and Social Framework and relevant national requirements. The essence of the ESMF is aimed at ensuring informed decision making and environmental and social accountability and to assist in achieving environmentally sound, socially inclusive and sustainable development. It must be noted that due to the fact that the ESMF provides a broad framework for environmental and social management for the project, it is important that all subprojects are subjected to the relevant screening and approval processes for the Bank as well as national legislation.

Legislative and Institutional Review

The ESMF outlines the national law, policy frameworks and institutions relevant to this project. This involved a review of national legislation, policies and strategies relating to education and environmental and social management. The ESMF also reviewed the relevance of the 10 Environmental and Social Standards under the Environmental and Social Framework of the World Bank. 5 of the 10 standards were found to be relevant in this project. Mandates of key institutions relevant to the project are also outlined in the ESMF.

Environmental and Social Risks and Impacts

The key environmental and social risks and impacts will largely occur under Sub-component 1.2 on 'Improving the quality of ECCDE services in targeted centers' where the project may will include the provision of indoor and outdoor materials, water tanked to ECCDE centers that do not have access to water, and meals provided to children in targeted ECCDE centers through the expansion of the existing school feeding program. Another component with anticipated environmental and social risks is component 2.2, which entails the enhancement of online learning for the targeted schools. The social and environmental risks include (i) labour and working conditions; (ii) environmental pollution due to improper waste management (iii) occupational health and safety (OHS)

and community health and safety including the spread of COVID-19; (iv) risks of sexual exploitation and abuse as some of the works might go in parallel with the school operation. The potential risks and impacts are considered to be (i) predictable and temporary and/or reversible; (ii) low in magnitude; (iii) site-specific, without likelihood of impacts beyond the actual footprint of the Project; and with a (iv) low probability of causing serious adverse effects to human health, livelihood and/or the environment. The Project's risks and impacts can be managed through the preparation and implementation of sub-project specific ESMPs and additional S&E instruments, as required, and identified during sub-project screening.

The Project's Environmental Risk Rating is classified as low due to the nature of the proposed interventions. Overall, the project activities are focusing on capacity building and technical assistance type of activities. The proposed project activities are not expected to have any significant adverse impacts on the environment and human health. No long-term or irreversible adverse impacts are expected from project implementation. The potential adverse environmental impacts are minimal. However, under Sub-component 2.2: Improve the quality of Mathematics and Science instruction in secondary education, there will be some activities involving procurement of some ICT equipment (interactive projectors, whiteboards, necessary software, and ancillary equipment). The repairs, servicing and end-of-life disposal of ICT equipment may result in environmental risks related to electronic wastes (e-wastes), hazardous waste and solid wastes if not managed appropriately. As such, and to ensure the management of e-waste and other hazardous waste, This ESMF includes a Waste Management Plan (WMP) (Annex L) entailing some simple guidelines on how to manage and arrange for the disposal of ICT equipment and solar panels (end-of-life and during repairs).

The Project's Social Risk Rating is classified as low. Considering the project objective which is to strengthen education service delivery and management systems and pilot initiatives to improve junior secondary retention in targeted areas, the social risks are associated primarily with the inclusive targeting of beneficiaries and specific ECCDE centres and schools for project interventions. Overall, the project activities are focusing on technical assistance type of activities. These include strengthening coordination and regulation of Early Childhood Care Development and Education (ECCDE) services and improving access to quality ECCDE services under Component 1; Improving literacy and numeracy in the early grades, the quality of Mathematics and Science instruction in secondary education and retention in secondary education under component 2 and project management, capacity building and technical

assistance under Component 3. The Project will not support development of any physical infrastructure. The key social risks relate to the possible exclusion of disadvantaged or vulnerable communities under components 1 and 2 and can be mitigated through an inclusive targeting approach. The PIU will finalize its targeting approaches for each of the relevant sub-components in agreement with the bank task team during project implementation. Under component 1, once the completed data is available from the first mapping of ECDDE centres, the final list of targeted ECCDE centres will be decided on based on agreed selection criteria. This risk can be mitigated by ensuring the agreed selection criteria – once developed - meets standards set out in the World Bank ESS 1 and in the World bank Directive on disadvantaged and vulnerable peoples as it applies in the specific country context. Sub-component 2.1. Improve literacy and numeracy in the early grades. This intervention will initially be implemented in about 243 primary schools in the targeted Tinkhundla. The program will be implemented in Grades 1 to 3. The implementation will follow phased approach, starting with preparation in and testing of materials and training in 2022, Grade 1 implementation in 2023, Grade 2 implementation in 2024 and Grade 3 implementation in 2025. Depending on results and availability of funds, the program maybe scale-up in other priority areas. This risk can be mitigated by ensuring criteria for selecting the 243 primary schools and priority areas is inclusive. Subcomponent 2.2. This intervention will be implemented in 126 junior secondary schools in the country. The implementation will start with preparation, adaptation of the program and a small pilot in 2022, covering 28 schools nationally. Through the next two phases, an additional 98 schools in priority Tinkhundla (those with high poverty and high dropout rate) will be covered. The risk of exclusion will be mitigated by the criteria for selecting the 126 Junior secondary schools and criteria cited in the project document for selecting additional schools in areas with high poverty and high dropout rate which is considered inclusive. Sub-component 2.3. Improve retention in secondary education (specifically support to boys and girls to stay in school) This sub-component will be implemented in Tinkhundla (constituencies) that have high poverty and high dropout rates based on an analysis of annual school census data and household survey data. The risk of exclusion is thus mitigated by these inclusive criteria adopted by the project. The risk rating of the project may be reconsidered, i.e. lowered, once criteria have been agreed upon for all relevant activities under Component 1 and 2.

As per the SEA/SH risk assessment tool of the Bank, the rating is low given the lack of civil works and technical nature of project interventions. As the prevalence of gender-

based violence incidences is reported to be high in Eswatini, GoKE has initiated several proactive steps such a passing a law on Sexual Offences and Domestic Violence Act (2018) and establishing a tracking system for incidents. Several organizations are present in the country and are active in the space of sexual and domestic violence etc. The risk can be mitigated by requiring contractors and sub-contractors to follow strict protocols relating to SEA/SH prevention training of all their part time and full-time workers associated with project activities, particularly those activities in and near schools, as will be outlined in the ESMF.

In terms of vulnerable groups and their inclusion in project benefits, project components include a specific focus on regions where the needs are greatest or barriers are most pronounced. An SEP that has been developed for the project and will be updated within three months of project effectiveness, as set out in the ESCP, as specific target locations are further fine-tuned and additional consultations are conducted. All Environmental and Social instruments will be disclosed to public by MoET.

Stakeholder Consultations

Understanding the importance of stakeholder engagement for the success of any project, stakeholder engagements were started quite early in the project. This was keeping in line with ESS 10 of the Bank's ESF. During project preparation, a number of engagements were held with key project stakeholders. This was done through various World Bank missions that started in 2019. When the development of the ESMF was commissioned, initial engagements were held with MoET, MoH, DPMO, MTAD, MSYA to introduce the ESMF and SEP development process. These meetings were carried out on 10 and 11 December 2020. A stakeholder workshop was held on 16 December 2020. Participants of the workshop were from the various departments of the MoET, MSYA, MICT, Emlalatini Development Centre and UNESCO. Twelve (12) key informant interviews were conducted with stakeholders. These consultations have further informed the project concept note.

Institutional Arrangements for Project Implementation (ensure this is aligned with updated project document)

The Ministry of Education and Training (MoET) will lead the implementation of the project and will therefore be responsible for its overall coordination. This means that it

will be responsible for (i) liaison and reporting to the Ministry of Economic Planning and Development (MEPD) and the World Bank; (ii) coordinating implementation, (iii) monitoring progress and reporting (with inputs from other implementing entities) under the project. There will be several Ministries involved in the implementation of the project under different components and sub- components.

At project level, a project implementation unit (PIU) will be established. The PIU will have representation from other designated participating ministries in the form of 'focal points' situated in those ministries. These focal points will be existing full-time staff members of the government and/or civil service in order to enhance government ownership and build sustainable in-house capacity beyond the life of the project. The focal points will be designated by the government.

Environmental and Social Implementation Arrangements for the Project

The management, coordination and implementation of the ESMF and associated Environmental and Social Management Plans (ESMPs) will be the responsibility of a dedicated team of members within PIU. These are outlined below:

The Environment and Social Safeguard Officer (ESSO), who will monitor the overall implementation of the ESMF and coordinate the timely preparation and approvals of ESMPs for subprojects. The ESSO will be responsible for ensuring that the provisions of the ESMF and any other necessary environmental compliance measures are complied with during the construction period. The ESSO will also prepare 1) quarterly reports summarizing monthly monitoring results, to be included in the Project's Quarterly Reports to the World Bank, and 2) reports that aggregate and analyse monitoring results ahead of regular World Bank implementation support missions with MoET.

Monitoring and Evaluation

Regular Reporting: **Regular quarterly monitoring reports on the implementation of ESMF will be prepared and submitted.**

Incidents and Accidents: **The Bank should be promptly notified of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers.**

This will be done by the environmental and social safeguards officer (ESSO).

LIST OF ACRONYMS

Acronym	***Full meaning***
AIDS	Acquired *Immuno*-deficiency Syndrome
DPMO	Deputy Prime Minister Office
ECDE	Early Childhood Development and Education
ECOT	Eswatini College of Technology
EEA	Eswatini Environment Authority
EGM	Early Grade Mathematics
EGR	Early Grade Reading
ENYC	Eswatini National Youth Council
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
ES	Environmental Specialist
GDP	Gross Domestic Product
HCI	Human Capital Index
HIV	Human *Immuno* Virus
ICT	Innovation, Communication and Technology
INSET	In-Service Training
MICT	Ministry of Information, Communication and Technology
MoET	Ministry of Education and Training
MOH	Ministry of Health
MOSYAC	Ministry of Sports, Youth, arts and Culture
MTAD	Ministry of Tinkhundla Administration and Development
NCC	National Curriculum Centre
NGOs	Non-governmental Organizations
PSU	Project Support Unit
SS	Social Specialist
STEM	Science, Technology, Engineering and Mathematics
SWAGAA	Eswatini Action Group Against Abuse
TVET	Technical and Vocational Education Training
UNESWA	University of Eswatini
VOCTIM	Vocational and Commercial Training Institute Matsapha

1. INTRODUCTION

1.1 Project Background

The Government of Eswatini (GoKE), through the Ministry of Education and Training (MoET) is preparing to undertake a project aimed at Strengthening Early Childhood Development and Basic Education Systems to Support human Capital development in Eswatini. Funding for the project will be through a loan facility from the World Bank. The primary mandate of the Ministry of Education and Training is to provide access to relevant quality education, at all levels, to all Eswatini citizens, considering all issues of efficacy, equity and special needs. The Ministry's vision is 'attainment of equality in educational opportunity for all pupils of school going age and adults irrespective of their socio-economic background, with the ultimate goal of enhancing their productive capacity, thus improving the quality of their lives.

1.2 Project Objective

The Project Development Objective (PDO) is to strengthen education service delivery and management systems to provide quality ECCDE, primary and junior secondary education, and pilot initiatives to improve junior secondary retention in targeted areas.

1.3 Project Components

The project has four components as outlined below.

Component 1: Strengthen coordination and regulation of ECCDE and improve quality of ECCDE services:

- Subcomponent 1.1: Strengthen systems to improve ECCDE service delivery
- Subcomponent 1..2: Improve the quality of ECCDE services in targeted centers

Component 2: Improve quality and internal efficiency in basic education

- Subcomponent 2.1: Improve literacy and numeracy in the early grades
- Subcomponent 2.2: Improve the quality of Mathematics and Science instruction in secondary education
- Subcomponent 2.3: Improve retention in secondary education

Component 3: Project Management, Capacity Building and Technical Assistance

- Subcomponent 3.1: Project Management, Capacity Building and Technical Assistance

Component 4: Contingent Emergency Response Component

1.4 Need for the ESMF

This Environmental and Social Management Framework (ESMF) will assist the Ministry of Education and Training (MoET) to identify the types of environmental and social assessments that should be carried out for the project. The ESMF is prepared to guide the project in examining the potential environmental and social risks and impacts when subprojects' specific locations are determined, and their details are made available. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. It includes adequate information on the area in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used. The methodology used in the preparation of this ESMF is described below. There has been a number of ESMFs developed which have been used for reference. These include the ESMF for Strengthening of Health Systems in Eswatini, ESMF for COVID-19 Management. Both of these were developed by the Ministry of Health. Examples of ESMFs from other countries including the ESMF for Strengthening of Human Capital in Basic Education for Rwanda were consulted.

1.5 Purpose and Objectives of the ESMF

The purpose of the ESMF is to ensure that the project is implemented is an environmentally and socially sustainable manner. Hence the preparation of this comprehensive and detailed Environmental and Social Management Framework which will be implemented and monitored throughout the lifetime of the project.

Given that the specific locations of the project activities have not been determined at this stage, preparation of an Environmental and Social Management Framework (ESMF) is required to assess the environmental and social risks and impacts, and propose avoidance, mitigation and management measures across the project. The objective of this ESMF is to set out principles, rules, guidelines and procedures that shall be used to assess and manage expected environmental and social risks and impacts during project implementation and when subproject locations are known. Once each subproject location is determined and potential environmental and social impacts are assessed, site-specific ESMPs will be prepared and implemented to manage any environmental and social risks through the project lifecycle.

The ESMF is guided by the World Bank ESF and other additional resources on good international industry practice found in these Guidelines. The ESMF provides principles and

specific process and technical guidance to the Project implementing agencies and their consultants to assess the E&S risks and impacts of the component activities, including guidelines for ensuring that individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable, have access to the benefits resulting from the Project. This ESMF will be aligned to the Stakeholder Engagement Plan (SEP) and other specific plans (such as Environmental and Social Commitment Plan (ESCP), Labour Management Plan (LMP), etc.) that will be prepared for the Project. This ESMF will be applied to all activities (works, good/services, and technical assistance and research activities to be financed by the Project and/or its subprojects.

1.6 Key Contents of the Environmental and Social Management Framework

The ESMF is a comprehensive document which can guide the project in the selection, preparation and implementation of sub-projects to enhance the environmental and social performance. It provides technical guidance for environmental and social assessment and management during preparation of the selected sub-projects. The ESMF will be prepared in line with international good practice and the World Bank's Environmental and Social Framework and take into consideration relevant national Environmental and Social legislation in Eswatini.

The ESMF will cover the following aspects:

- Undertake an assessment (desk review and field review) to establish the generic baseline scenario of the country and potential project sites.
- Review of national legislative, regulatory and administrative framework within which the project will operate, with a focus on requirements that will apply to the planning, approval and implementation of sub-projects; research and summarize regional and international agreements and treaties. The review will include a comparative summary of gaps between national regulations and World Bank ESF and a definition of ESSs of the ESF which will be relevant to the project.
- Relevant potential environmental and social risks and impacts that may arise as a result of the proposed Project and the sub-projects.
- Instruments and procedures for managing, mitigating, and monitoring environmental risks and social concerns related to the subprojects, such as assessments (e.g., ESIA), studies management plans (e.g., ESMP) and respective monitoring instruments.
- Institutional arrangements for implementing the ESMF, including clear roles and responsibilities for screening, ESMF preparation, consultations, approval, procurement and supervision and monitoring. This will include a thorough review of

the authority and capability of institutions at different levels (e.g., national and district levels) and their capacity to manage and monitor ESMF implementation. The ESMF should also recommend requirements for staffing and training.

- Training requirements for strengthening capacity for monitoring and environmental and social management.
- Grievance and Conflict Resolution mechanism for the project and for site-specific activities.
- Budget and timeframe: a detailed budget and timeframe for implementation of the ESMF for the full duration of the project. This should include development of ESMPs, clearance requirements, capacity building, consultations, disclosure etc.
- Documentation of consultations undertaken to develop the ESMF.

1.7 Application of the ESMF

The ESMF needs to be integrated into the preparation and implementation stages of the various project components. It is an essential ingredient aligned with the project/subproject activities and is to be followed through the entire project cycle from planning, including site identification; design; implementation and operation/maintenance to attain the above outlined purpose and objectives to:

1. Support the integration of environmental and social aspects into the decision-making process at all stages related to planning, design, execution, operation and maintenance of sub-projects, by identifying, avoiding and/or minimizing adverse environmental and social impacts early-on in the project cycle.
2. Enhance the positive/sustainable environmental and social outcomes through improved/ sensitive planning, design and implementation of sub-activities.
3. Minimize environmental degradation as a result of either individual sub-projects or through their indirect, induced and cumulative effects, as much as possible.
4. Avoid or minimize negative social impacts including impacts from labour influx to community health and safety, and protecting and including in project benefits vulnerable and marginalized groups such as women, children, elderly and disabled persons in order to enhance social inclusion – for all groups of people.
5. Minimize impacts on cultural heritage both tangible and intangible.

1.8 Revision/Modification of the ESMF

The ESMF will be updated where necessary. This may be due to unexpected changes or significant project details/ designs that may potentially give rise to significant environmental and social risks. There may also be new/updated legislation that may have a bearing on the environmental and social compliance of the project. Based on the experience of application and implementation of this framework, the provisions and procedures would be updated, as appropriate in consultation with the World Bank and the implementing agencies/departments.

1.9 Activities Excluded from Strengthening Education and Skills Training Systems to Support Human Capital Development in Eswatini Project

The following activities shall be excluded:

- Any activity within the protected area/UNESCO declared heritage site;
- Any activity located within forested areas or plantations;
- Any activity involving procurement of pesticides or fertilizers and/or with the potential to lead to increased use of pesticides or fertilizers; and
- Protected area or critical natural habitat.

1.10 Methodology Approach in Preparation of ESMF

Two (2) introductory meetings were held with the Project Management Committee on 2 December and 7 December 2020. A follow-up meeting was held with the World Bank team on 21 December 2020. Subsequent to these meeting, an inception report was prepared and submitted outlining the approach, timeframes and other aspects that would ensure that the ESMF is prepared comprehensively and timely.

1.10.1 Desktop Studies

Review of World Bank requirements, good international industrial practices (GIIP), WBG EHS Guidelines, and national policy and regulatory framework has been carried out. Relevant national and international guidelines, policy, regulatory and institutional framework related to ESMF and to education and skills development for human capital development project were reviewed. These documents included the following:

- World Bank guidelines for an Environmental and Social Management Framework. This review will include the review of the 10 World Bank Environmental and Social Standards and their applicability to the project:
- Relevant international agreements which Eswatini is party to, relating to education and the environment
- National policy and regulatory framework, especially in relation to education, environmental sustainability and social risk management
- World Bank Group Environmental, Safety and Health Guidelines
- National and local reports will be reviewed to understand the environmental and social status of the potential sites. Review of such information will include environmental and social data from credible institutions like the Central Statistics office, World Bank Reports on Eswatini and Eswatini Government Departments.

1.10.2 Field Surveys

A few sites were selected for each component of the project for better understanding of the sites for subprojects. Details on sites visited are included in Annex F. Visits were made to these sites on the 7th of January 2021 and the principals for the schools were interviewed for their perspective and experiences. Observations were also made on site for better understanding of the state of the baseline conditions for this project.

1.10.3 Stakeholder consultations

A workshop was held with stakeholders identified with the MoET on 14 December 2020 to get stakeholder inputs that would inform the development of this ESMF. The project outline was presented, and the ESMF process was outlined to stakeholders. A questionnaire was

prepared, filled by stakeholders and discussed during a workshop convened on 16 December 2020. Stakeholders engaged during the workshop included representatives of Early Childhood Development and Education (ECDE), National Curriculum Centre (NCC), Ministry of Health (MOH), Ministry of Sports, Youth, Arts and Culture (MSCYA), Eswatini College of Technology (ECOT), and the Ministry of Information, Communication and Technology (MICT). Detailed information about stakeholders is contained in the project's SEP. Follow up consultations were made with individual stakeholders who had joined the workshop virtually. Project affected parties were identified, as well as project interested parties.

Different stakeholders were identified in the project's Stakeholder Engagement Plan (SEP): both project-affected parties and other interested parties as well as individuals or groups that will be affected or likely to be affected by the project were identified as 'project affected parties' and other individuals or groups that may have an interest in the project and these were identified as 'other interested parties. These were engaged to understand possible social and environmental risks perceived and experienced. Consultations undertaken sought to acquire more information on environment and socio-economic setting in the identified areas. Stakeholders include communities of sampled areas, governments departments and parastatals relevant to the project, community-based organizations and non-governmental organizations, vulnerable groups. Consultations were mainly in the form of focus key informant interviews. All consultations were recorded and appended as part of the ESMF report. Refer to annex F where details are present. Stakeholder groups that were engaged included MoET MoH, DPMO, MTAD, MSCYA to introduce the ESMF and SEP development process. These meetings were carried out on 10 and 11 December 2020. A stakeholder workshop was held on 16 December 2020 to solicit key stakeholder input on the ESMF development and further stakeholders that may have been missed in the initial stages of the project. Participants of the workshop were from the various departments of the MoET, MSYA, MICT, Emlalatini Development Centre and UNESCO. Other consultations included key informant interviews which were conducted within the month of January 2021 to present overview of project, record observations relating to physical state of the school, and discuss environmental and social issues experienced by pupils and teachers. The consultations included stakeholders representing 10 organizations which were: Shinning Stars re-school, Mhlabatsini BA Primary School, Shewula Primary School, Neighborhood Care Points, Gija Primary School, Mandulo High School, Tikhuba High School, MICT, VOCTIM and ENYC. Feedback from these stakeholders is presented in chapter 7 below.

1.10.4 Identification of Environmental and Social Risks

Based on the field survey, national legislative requirements, World Bank requirements, desktop review of reports and data, a review of the project details, potential environmental and social risks were identified. The identified risks were for all the stages of the project cycle are outlined in Chapter 5 of the report.

1.10.5 Prevention, Mitigation and Management of Environmental and Social risks

For each potential risk identified, a corresponding mitigation measure was proposed based on the mitigation hierarchy i.e. prevention, minimizing, mitigation and compensation/offsetting. Implementation and enforcing entities that would be responsible for the effective implementation of mitigation measures would then be identified and proposed. A budget was proposed for estimated financial resources for successful implementation of the ESMF.

1.10.6 Institutional Arrangements and Capacity Building Needs

The ESMF also assessed the practical ways for successful implementation of the project considering the mandates and current capacities of relevant institutions. Institutional arrangements were recommended for project implementation and how these should integrate environmental and social management. A training programme was also proposed subsequent to identification of capacity gaps.

1.10.7 Grievance Redress Mechanism

This was developed in harmony with the stakeholder engagement plan for this project. The GRM was developed based on the following principles:

- **Fairness.** Grievances are treated confidentially, assessed impartially and handled transparently.
- **Objectiveness and independence**. The GM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case. GM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- **Simplicity and accessibility**. Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them. Project beneficiaries have a range of contact options including, at a minimum, a telephone number (preferably toll-free), an e-mail address, and a postal address. The GM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GM does not use complex processes that create confusion or anxiety (such

as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).

- **Responsiveness and efficiency.** The GRM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances are trained to take effective action upon, and respond quickly to, grievances and suggestions.
- **Speed and proportionality.** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
- **Participatory and social inclusion**. A wide range of project-affected people, community members, members of vulnerable groups, project implementers, civil society, and the media are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor people and marginalized groups, including those with special needs, are able to access the GM.

1.10.8 Procedures and Plans

The following procedures and plans were also developed: worker and labour management, accident response, occupational health and safety, community health and safety, and Waste management. All these procedures were presented as Annexes to the ESMF report.

2. PROJECT DESCRIPTION

2.1 Introduction

The proposed project aims to take a life-cycle approach to developing human capital with a focus on Early Childhood Development and Education (ECDE), as well as basic education. The components were chosen based on: (i) government priorities and commitment for reform in specific areas; (ii) coordination with other development partners and (iii) addressing immediate priorities arising from COVID-19 to start building a digital learning system. This project is designed as a first phase engagement in the education sector of Eswatini and as such it puts a strong emphasis on strengthening education service delivery and management systems. To this end, the project aims to put in place the key building blocks that are critical to improve service delivery in ECCDE and basic education as well as to promote accountability for results. The envisioned trajectories for the ECCDE and basic education sub-sectors in the next five years (i.e., the project implementation timeline) and in the next 10 years. The project consists of four components: (i) Strengthen coordination and regulation of ECCDE and improve quality of ECCDE services; (ii) Improve quality and internal efficiency in basic education; (iii) Project Management, and Capacity Building and Technical Assistance; and (iv) Contingent Emergency Response Component (CERC).

2.2 Context within the Country's Development Priorities

The project is in line with Sustainable Development Goals (SDG) 2, 4 and 9. These goals are aimed at ensuring healthy lives and promoting well-being for all at all ages, promoting quality education and enhancing industry, innovation and infrastructure. Although these are global in nature, the country is committed to being part of the global community in ensuring that Sustainable Development Goals are attained by 2030. Human Resource Development is one of the key macro strategic areas identified in the National Development Strategy (NDS) of the country. The NDS recognizes human resources as one of the primary resources in Eswatini. The important elements identified for a successful human resource development are:

- Appropriate education and training (including a reorientation away from the presently academic orientation to technical and vocational orientation);
- Adequate incentives extended to businesses and households to encourage the full development of human capital;
- Appropriate youth programmes; special attention to members of society with disabilities; and all other areas impacting on the quality of human capital (health, water, sanitation, shelter, etc.).

The strategic roadmap, which was developed in 2018 also identifies 5 priority areas for the country's economic growth: Amongst these priority areas is Education and ICT. This project will contribute significantly to this priority area.

2.3 The Need for the Project

According to the World Bank, the Human Capital Index (HCI) for Eswatini is 0.41, ranking 124th out of 157 countries on the HCI, lower than the average for its income group.[1] This means that a child born in Eswatini will only be 41 percent as productive when (s)he grows up as (s)he could have been if (s)he was to attain good health and complete education by the age of 18. This affects the competitiveness of our population in the national and the global stage when it comes to opportunities (jobs and innovative skills).

The latest population estimate of Eswatini indicates that the country has about 1.1 million people. About 12 percent of the population are under the age of five,[2] and with a median age of 21.7 years and 56 percent of the population below 25 years of age,[3] Eswatini is one of the youngest countries in the world. There is high poverty, food insecurity and high-income equality especially in rural areas. The national poverty level is at 58.9%. Almost two thirds of the nation are food insecure.

Eswatini has the highest rate of HIV infections in the world, with more than a quarter (27 percent) of its reproductive age population living with HIV. Females are particularly at risk - 35 percent of women and adolescent girls between the ages of 15 and 49 years are HIV-positive, compared to 19 percent of boys and men in the same age group.[4] This has led to the increase of orphaned children and child-headed homes.

The country is experiencing challenges when it comes to efficient and equitable delivery of education and health services. This then results to poor education and health outcomes, which has a significant bearing on low levels of human capital in the country.

Few students are qualifying to enter Science, Technology, Engineering and Mathematics (STEM)-related courses after completing senior secondary school. While access to the first year of primary school is almost universal in Eswatini, children start to drop out of school in junior secondary, particularly in Form 2 (Grade 9).

[2] Eswatini Population Census, 2017
[3] The Kingdom of Eswatini (forthcoming), Towards Equal Opportunity: Accelerating Inclusion and Poverty Reduction in Eswatini, Systematic Country Diagnostic
[4] UNICEF 2019

Retention of students is at its lowest in junior secondary education and there are gender, region, location, and income differences in access which need to be addressed.

The youth of Eswatini continue to face a variety of challenges, such as limited access to post-secondary education and high youth unemployment. In addition, The Gross Enrollment Ratio for tertiary education in Eswatini is very low at about 7 percent in 2013 and is mainly accessed by individuals who are from wealthier households. TVET, and post-primary skills training more broadly, is a largely unregulated sector which lacks sufficient coordination in Eswatini.

2.4 Project Components

The Project has four (4) components and the components will be refined by the MoET during project preparation. The components are outlined in Table 1 below.

Table 1: Project components and sub-components

Component 1: Strengthen coordination and regulation of ECCDE and improve quality of ECCDE services	1.1: Strengthen systems to improve ECCDE service delivery
	1.2: Improve the quality of ECCDE services in targeted centers
Component 2: Improve quality and internal efficiency in basic education	2.1 Improve literacy and numeracy in the early grades
	2.2: Improve the quality of Mathematics and Science instruction in secondary education
	2.3: Improve retention in secondary education
Component 3: Project Management, Capacity Building and Technical Assistance	3.1: Project Management, Capacity Building and Technical Assistance
Component 4: Contingent Emergency Response Component	

Across the project components, interventions related to system strengthening in key areas of the ECCDE and basic education sectors will be implemented at the system level (i.e., nationally, supported the MoET and covering all four regional education offices). Interventions that seek to provide direct support to schools, teachers and students will be implemented in priority *tinkhundla* that are rural and have high poverty and dropout rates. This approach is expected to maximize the impact of the project in geographic areas that have low human capital outcomes.

The focus will be on ensuring that all children are entitled to, and receive, a comprehensive package of services that will enable them to reach their full potential. Within these components, there are four cross-cutting issues: gender, inclusion, digital skills, and sustainability of interventions. Some elements of the project will also address the issues arising from the COVID-19 pandemic, such as access to online learning opportunities for the poorest children, retaining students in school, and access to clean water, sanitation and hygiene in schools. The project will also focus on strengthening coordination and regulation at all levels of education, more specifically for ECDE. The following provides a detailed outline of each component of the project.

2.4.1 Component 1: Strengthening coordination and regulation of Early Childhood Care Development and Education (ECCDE) services and improving access to quality ECCDE services

This component aims to strengthen ECCDE service delivery in Eswatini by putting in place the key building blocks that are essential for a well-integrated, multi-sectoral ECCDE system that provides a holistic package of services for children. First, it will strengthen the ECCDE delivery system by improving the quality and utilization of data generated by the system. Second, the project aims to improve the quality of services delivered by a targeted number of ECCDE service providers by supporting the rollout of the new ECCDE curriculum and testing out a model that provides a holistic set of services to children, aligned with minimum norms and standards and involving all relevant sectors. The model which will be tested out in a targeted number of ECCDE centers and all existing Grade 0 classrooms will be used to show how to comprehensively improve ECCDE service delivery and ultimately child development outcomes.

1.1.1.1 Sub Component 1.1: System strengthening to improve ECCDE service delivery

The objective of this sub-component is to strengthen the ECCDE delivery system by improving the quality and utilization of data generated by the system. Ultimately, the aim is to improve the monitoring and regulation of all ECCDE providers and strengthen coordination across the sub-sector, and for the MoET and DPMO to ensure that more children are accessing quality ECCDE services. There are two aspects of data system strengthening that will be supported under the project. First, is an update of the mapping of all ECCDE providers. Secondly, the project will support a national, periodic assessment of the quality of ECCDE services and child development and education outcomes. These interventions will seek to build the capacity of

the MoET and DPMO to undertake similar data collection initiatives as part of the regular monitoring and evaluation processes embedded in the system.

The MoET, with financing from the GPE and support from UNICEF, is in the process of undertaking a mapping of ECCDE service providers to provide a comprehensive overview of the coverage ECCDE services in Eswatini. The mapping will form the basis for moving towards a systematized process for better monitoring and coordination, where the data can be consolidated into the overall Education Management Information System (EMIS) of the MoET and updated by the MoET every two years through its regular school census process, which is a self-reporting system where school/ECCDE heads provide details on service delivery. However, given the regular turnover of ECCDE service providers in Eswatini, the project will support another physical mapping of ECCDE providers around year 4 of the project. The mapping will focus on what ECCDE services are available in Eswatini and where these services exist. It will seek to collect and update information on, but not limited to, the location, number of children by age category, number of practitioners/ caregivers/ teachers, some details on the learning environment and the types of services offered.

The project will also support the MoET to undertake a more in-depth periodic assessment in a nationally representative sample of ECCDE service providers to understand more about the quality of ECCDE services provided, and early child development and education outcomes. The project will build on existing tools such as the MELQO[5], focusing on children's learning and development outcomes and the quality of early learning environments, and Teach ECE which monitors improved teacher quality, and develop an assessment tool that can be used for the measurement of ECCDE outcomes in Eswatini. It will also collect information about the resilience of facilities against climate change and related disaster risks, particularly storms and floods. While the project does not support any construction, the data collected through the project will provide the MoET with invaluable information that can be used to plan enhance the climate resilience of ECCDE infrastructure through future rehabilitation and expansion efforts.

Targeting: Interventions under sub-component 1.1 will be targeted nationally. The mapping of ECCDE service providers will cover all public and private service providers in the country. The quality assessment will cover a nationally representative sample of providers, including a sample of ECCDE centers that will be supported under sub-component 1.2. Capacity building

[5] The MELQO tools were developed by UNICEF, the World Bank, and the Brookings Institution, and includes a child direct assessment, classroom quality observation, and interviews with parents, teachers and directors.

support to strengthen data management and utilization will be targeted to the MoET and DPMO.

1.1.1.2 Subcomponent 1.2: Strengthening the quality of services in targeted centres

This sub-component seeks to support the rollout of the new ECCDE curriculum (Grade 0) in targeted ECCDE centers. Through this intervention, the project aims to achieve two objectives: (i) ensure the provision of high quality ECCDE services in targeted centers, many of which cater to underserved communities; and (ii) in doing so, develop and test an effective model to rollout the new curriculum and provide a holistic package of ECCDE services nationally.

Standard package of support: The standard package of support that will be provided under this sub-component will include the provision of indoor and outdoor materials, in-service teacher training to build teachers/caregivers pedagogical capacity to implement the new curriculum, water tanked to ECCDE centers that do not have access to water, and meals provided to children in targeted ECCDE centers through the expansion of the existing school feeding program.

To support the rollout of the new curriculum in Grade 0 classrooms in government primary schools and ECCDE serving 5-year-old children, the project will finance the printing and dissemination of existing instructional materials, as well as the procurement of additional indoor materials, such as puzzles, blocks, stationery etc. If not available, the project will support the procurement of outdoor equipment such as jungle gyms for the targeted ECCDE centers and Grade 0 classrooms in schools. The project will implement in-service teacher training in targeted centers and schools, which will include the development of teacher training materials and a pilot across a few ECCDE centers and Grade 0 classrooms in schools to refine the training process and materials. In-service training will take place twice under the project, with the initial training of Grade 0 and ECCDE teachers followed by refresher training in later years. This will also be combined with monitoring and supervision visits by inspectors. Many community- based and private ECCDE centers also cater to children under the age of 5 who are not in Grade 0. Currently, there is no standardized curriculum for these younger children, raising concerns about the quality of services they receive. Considering this, the project will finance the development of a standardized curriculum for children between the ages of 3 and 5 years. Training manuals will be developed, piloted, refined and finalized, and training will take place once during the project.

Under this sub-component, and where necessary, the project will finance the procurement of water tanks and support the tanking of water to targeted ECCD centers that do not have piped water. The project will also support the provision of nutritious meals for children in selected

centers that are not covered by the school feeding program by collaborating with existing partners such as World Food Program (WFP) and the National Emergency Response Council on HIV/AIDS (NERCHA). In doing so, the project aims to lessen the impact of climate change on households and communities, especially from the adverse impacts of droughts. Droughts, which are becoming more frequent in the country due to climate change, threaten households' food security and access to clean water, which turn will have detrimental impact on children's overall development and ability to learn. By ensuring that children in rural and disadvantaged communities are receiving nutritious meals and clean water, the project will help reduce the impact of drought and food insecurity on children's growth at a critical stage in their lives.

*Targeting***:** This sub-component will be implemented in 300 ECCDE centres and Grade 0 classrooms that serve poor and rural communities. There are currently 180 Grade 0 classrooms in public primary schools in Eswatini. Priority will be given to ECCDE centers (community and private) that are in targeted *tinkhundla* (constituencies) that have high poverty and high dropout rates at the secondary level. The final list of ECCDE providers will be determined based on the data from the on-going mapping exercises.

2.4.2 Component 2: Improving internal efficiency and quality in Basic Education

This component aims to address two priority areas in basic education: (i) improving the quality foundational literacy and numeracy skills in early primary grades as well as Mathematics and Science education in junior secondary education, and (ii) improving student retention through the end of junior secondary education by piloting different interventions in tinkhundla with very high dropout rates.

1.1.1.3 Subcomponent 2.1: Improve literacy and numeracy in the early grades

The main objective of this sub-component is to ensure that all children are acquiring foundational literacy and numeracy skills in early primary grades in targeted areas. To this end, this sub-component will support the effective implementation of the new Competency Based Education (CBE) curriculum in English, siSwati, and Mathematics in Grades 1 to 3 by financing the development and implementation of an Early Grade Reading (EGR) and Early Grade Mathematics (EGM) program that is aligned to the new curriculum. The four core elements of the proposed intervention are: (i) development and provision of materials for teachers and learners, (ii) training and follow-up support for teachers, and (iii) implementing learning assessments. Each of these core areas are discussed in more detail below.

Materials for teachers and learners: The project will finance the development and provision of teaching and learning materials for teachers and learners that are aligned with the new

curriculum and complements existing resources, to promote learner-centered teaching practices in early grade reading and mathematics, based on sound pedagogical theory. The MoET has already developed learner books and teacher guides for Mathematics, English and siSwati and there is no imminent need for these materials to be revised. The project will provide support to ensure that there is a sufficient supply of these materials in classrooms. Moreover, the project will finance the development/adaptation of additional supplementary materials including reading materials, worksheets, remedial and enrichment activities, assessment tools, and detailed guides for teachers on how to support learners and bridge learning gaps. Supplementary reading materials that will be developed under the project will include information on climate change and related topics, in a way that is accessible and engaging to young children, to raise their awareness about the critical climate related issues that affect their environment.

Training and support for teachers: The project will provide in-service teacher training to support the implementation of the new curriculum in classrooms focusing on how to teach foundational skills effectively. With the introduction of the new curriculum, teacher training has largely involved orientation workshops for primary inspectors, In-Service Education and Training (INSET), and subject panel members around the CBE curriculum and half-day orientation workshops for teachers (once a year) to introduce them to the new materials. Complementing this effort, under the project, an enhanced training program will be developed by INSET with technical assistance provided through the project. A core group of master trainers, comprised of experts from INSET, as well as other departments in the MoET such as the National Curriculum Council (NCC) and primary inspectorate will be trained. This core group will then train a larger group of trainers, who will then train and support teachers across zones within regions (clustered training workshops). In addition, the project will support follow-up supervision and in-classroom coaching and mentorship for teachers, with a possible expansion of the current peer-to-peer support model. Principals/head teachers will also be trained around the roll-out of the new curriculum as well as on how to provide follow-up support for teachers.

Assessment: The project will provide support to strengthen the assessment of foundational skills both in a classroom setting and at the system level. First, as part of the in-service teacher training provided under the project, teachers will be trained on how to use formative assessments as an integral part of their classroom instruction, by regularly assessing their students' learning progress, identifying gaps and providing tailored support. Teachers will also be provided with assessment tools for which they have the autonomy to adapt to their classrooms to reduce the burden on them of developing high quality assessments. The project

will also finance the development and implementation of standardized national early grade reading and mathematics assessments (EGRA and EGMA) for Grade 3 students which can be undertaken on a periodic basis (every two to three years). The purpose of a standardized national assessment would be to measure gains in foundational skills over time at the system level.

Targeting: The full package of EGR and EGM interventions under this sub-component will be implemented in about 240 primary schools in the targeted priority tinkhundla (i.e., those that have high poverty and dropout rates). The standardized EGRA and EGMA assessments will be conducted in a nationally representative sample of schools, with sufficient coverage of schools receiving the full package of support under sub-component 2.1.

1.1.1.4 Component 2.2: Improve the quality of Mathematics and Science instruction in secondary education

The objective of this sub-component is to improve the quality of Mathematics and Science education in junior secondary schools using an innovative ICT-enabled model, i.e., the Progressive Mathematics Initiative (PMI) and Progressive Science Initiative (PSI). In doing so, the project aims to respond to the stark digital divide between children from wealthier and poorer households and from urban and rural communities, which was laid bare during the COVID-19 pandemic. The PSI-PMI model, which was developed by the New Jersey Center for Teaching and Learning (NJCTL), uses digital technology to create a student-centered classroom environment that fosters interactive teaching and learning methods and group discussions. In addition, the program includes extensive online in-service teacher training, which focuses on teachers' Science and Mathematics content and pedagogical knowledge. The model has been successfully implemented in several countries in the region and has shown positive results - both in terms of improved quality of classroom instruction as well as higher levels of student learning.

To help the MoET implement this model, the project will finance the following key areas under this sub-component. As a first step, the project will finance a review of the alignment between the PSI-PMI program and the Eswatini junior secondary Mathematics and Science curriculum and adjust the PSI-PMI program as needed. The adapted program will then be piloted in a sample of schools and evaluated. Building on the pilot and after modifying the intervention based on the findings of the evaluation, the model will be scaled up across all four regions in target schools. As part of the scale-up, all Mathematics and Science teachers in target schools will be trained on the new teaching and learning approach, through a combination of online and face-to-face training with the goal that by the end of the project, all teacher training will be

conducted online asynchronously. In addition, classrooms will be equipped with interactive projectors, whiteboards, necessary software, and ancillary equipment. For target schools without electricity, the project will finance the installation of solar panels. In addition, high priority schools will receive tablets for students which will be used to test the differential impact of the model on learning (for students with and without devices).

During the implementation of the online teacher training, teachers' content knowledge and pedagogical skills will be regularly assessed through formative assessments and examinations, which are embedded in the NJCTL's online teacher training courses. To assess the students' learning outcomes, teachers will use the formative assessment tools they will have access to as part of the PSI-PMI program. If students need additional support, teachers will provide remedial materials and support.

By strengthening the use of ICT in teacher training and starting to lay the foundation for e-learning technology to be integrated into basic education service delivery, the project is expected to improve the education system's resilience and ability to tackle disruptive, climate-related shocks (e.g., flooding) in the future by making distance learning technology more accessible. By supporting online in-service teacher training, the project will contribute towards reducing the carbon footprint of in-service teacher training programs, by eliminating the need for extensive travel by teachers and trainers that would have been required for face-to-face in-service training. In addition, climate change related topics will be included as part of the content that will be provided to teachers and students through the PSI-PMI curriculum to build students awareness.

Targeting: Through a phased approach, this intervention will be implemented in 125 junior secondary schools in priority *tinkhundla* that have high poverty and high dropout rate. In addition, in the 9 high priority *tinkhundla* (those with very high poverty and dropout rates), 20 junior secondary schools will receive the full package of support including tablets for students to pilot and test the differential impact of the PSI-PMI model on student learning with or without devices for students.

1.1.1.5 Component 2.3: Improve retention in secondary education

The objective of this sub-component is to improve student retention in junior secondary education by strengthening and scaling-up programs that provide support services for adolescent boys and girls to stay in school in targeted areas. In addition, the sub-component will provide support to assess and review key aspects of the OVC education grant program and test out different options to improve its effectiveness in improving retention among poor

and vulnerable children. The two areas of intervention under this sub-component are discussed in more detail below.

Strengthening the OVC education grant program: Under this intervention, the project seeks to strengthen the OVC education grant program to address economic barriers that prevent boys and girls from accessing secondary education. The program provides financial support to needy children enrolled in government junior and senior secondary schools. The grants, which are intended to cover tuition and examination costs, are directly paid to schools on behalf of each beneficiary student. While the grant amount for children to attend public schools is standard, school fees are not standardized and vary considerably amongst secondary schools and regions and often the grant amount is not sufficient to cover the direct costs of schooling. This highlights the need to assess the grant amount to ensure the effectiveness of the program to achieve its stated objective of improved educational outcomes. Household survey data and consultations with the MoET and the DPMO also show that there is room to improve the targeting and reach of the program.

To help the Government strengthen the program and improve its linkage with educational outcomes, especially the retention of students in secondary grades, the project will provide financing and technical assistance to: (i) undertake an initial study that reviews the current targeting, coverage, amount and alignment with school fees, and impact of the OVC education grant and propose relevant changes to strengthen the grant; (ii) pilot and test different options to improve the effectiveness of the OVC education grant in selected *tinkhundla* that have some of the highest poverty and dropout rates in the country. The different options that will be tested may include different amounts of the grant, different targeting methods, and different distribution mechanisms; and (iii) based on the findings of the pilot, support the Government to develop a strategy to improve the effectiveness of the program in a sustainable manner and create stronger linkages with educational outcomes. The final design of the pilot will be determined based on the initial study.

The project's objective to improve the targeting and impact of the OVC grant program to ensure that poor households receive support to send their children to secondary school will contribute towards building communities' resilience to the impacts of climate change on human capital formation. By providing support to cover school fees and related costs, the project will reduce the burden on poor household to choose between food and education for their children when faced with climate-related stocks, such as droughts or floods.

Support for girls and boys to stay in school: This intervention will support the MoET to scale-up existing in-school and out-of-school programs that provide different types of support for

adolescent boys and girls that have shown promising results, especially in terms of improving access to and retention/re-enrollment in secondary education. The project aims to equip adolescent boys and girls with a wide range of psychosocial skills and relevant knowledge (e.g., communication, assertiveness, self-awareness, information on nutrition, sexual and reproductive health, menstrual health management, and substance abuse related issues) in order to empower them to effectively manage day-to-day life challenges, make informed decisions and successfully transition into adulthood. Through this intervention, the project will tackle issues such as adolescent pregnancy, substance abuse, and other risky behaviours, that are critical factors leading to dropout in Eswatini and have lasting adverse impacts into adulthood. Focus will also be given to raising adolescents' awareness about gender-based violence (GBV) and sexual exploitation and harassment (SEAH) issues and give them information on how to access referral services and programs. In addition, a key element of the life-skills program will be content to raise adolescents' awareness about climate change and effective actions they can take to build climate resilience and mitigate its impact within their communities.

To implement this intervention, the project will provide support to the MoET first to undertake an initial assessment of existing programs that are being implemented by non-governmental organization (NGOs) in the targeted areas. Based on the findings of the initial assessment, relevant programs with promising results will be selected through a transparent and rigorous approach. Technical and financial support will be provided by the project to help the selected programs/NGOs in collaboration with the MoET to adapt, refine and strengthen their programs, train mentors and educators, and develop the required materials. The project will provide financing to cover operational costs and help scale-up these interventions using both within-school and out-of-school channels including using extra-curricular activities, boys' and girls' clubs and other safe space approaches. In addition, the project will finance an evaluation to assess the effectiveness of these interventions to inform future scale-ups.

Targeting: This sub-component will be implemented in the 9-high priority tinkhundla (constituencies) that have high poverty and high dropout rates based on an analysis of annual school census data and household survey data.

2.4.3 Component 3: Project Management, Capacity Building and Technical Assistance

The objective of this component is to strengthen key management capacities of the MoET, which is the main implementer of the project, as well as build the capacity of regional and local education offices. The following key areas will be supported under the component.

First the project will strengthen MoET's capacity to implement the project. The MoET has established the Project Support Unit (PSU) to manage key aspects of project implementation, including in the areas of procurement, financial management, supervision of project activities, M&E, and environmental and social safeguards. The PSU will have a 'hybrid' structure that is comprised of full-time MoET staff seconded to the PSU and consultants (see implementation arrangements for details). The project will finance the hiring of consultants in key technical areas as well as cover selected operating costs related to project management. In addition, the project will finance training for MoET and regional and local education office staff in the areas of M&E, data management and quality assurance and accountability systems. It will also finance study tours for the MoET to learn from countries in the region that have implemented similar interventions successfully

Second, under this component, the project will provide technical assistance to undertake select studies, including (i) an assessment of challenges and opportunities in basic education to promote inclusive education; and (ii) strategies to integrate digital technology in education service delivery.

Lastly, the project will provide support to the MoET to strengthen citizen-engagement systems to ensure that beneficiaries and stakeholders have a platform to raise their concerns, provide input and enhance accountability for results under the project and in the basic education system more broadly. To this end, the project will finance regular surveys of beneficiaries using locally available technology (phone and SMS based surveys) and provide technical assistance to integrate these surveys into the regular MoET data collection systems.

Targeting: This subcomponent is targeted at the ministry of education and training staff, the PSU and regional education officers.

2.4.4 Component 4: Contingent Emergency Response Component (CERC)

This component is included in accordance with paragraphs 12 and 13 of World Bank Investment Project Financing (IPF) Policy, contingent emergency response through the

provision of immediate response to an eligible crisis or emergency, as needed. The component will allow the Government to request from the World Bank rapid reallocation of project funds to respond promptly and effectively to an emergency or crisis. This could be the result of a natural or climate change related disaster or other crisis that have the potential to cause adverse impacts on the education sector. An operational manual for this component will be developed if/when needed. This component will target the central government, especially the Ministry of Economic Planning and Development (responsible for the management of external funding and capital project implementation) and Ministry of Education and Training.

3. POLICY, LEGAL AND REGULATORY FRAMEWORK

3.1 Introduction

This chapter identifies the applicable lender requirements and national standards. Where national legal standards are not as stringent as international requirements, the project will be required to defer to the most stringent requirement except in cases where that would contravene national law or where this is found to be unusually onerous. The ESMF for this project has been prepared according to the following legislation: The Constitution of the Kingdom of Eswatini, Environmental Laws, International Standards, Normative Acts, and Regulations as well as applicable guidelines and procedures; and the World Bank's Environmental and Social Framework (ESF) including applicable Environmental and Social Standards (ESSs). Along with the national regulations, Eswatini is signatory to a number of international conventions, including those related to environmental protection. For the majority of disciplines, where there is a difference between National Eswatini's standards and World Bank ESS, the Bank ESS will prevail.

3.2 Applicable National Laws and Regulations

The following laws, policies and Regulations are applicable to the project in relation to the ESF.

3.2.1 The Kingdom of Eswatini Constitution Act No.1/2005

This is the supreme law in Eswatini. Section 210 (2) provides that the state shall protect and make rational use of its land, mineral, water resources as well as its fauna and flora, and shall take appropriate measures to conserve and improve the environment for the present and future generations. The constitution is binding on all Eswatini citizens including implementation of projects in the country as it is the supreme law of the country.

3.2.2 Environmental Management Act, No. 5 of 2002

This is the framework law for environmental management in the country. It outlines the principles that govern environmental Management and Institutional framework for national environmental management. It outlines the tools and processes to be used for environmental management, pollution and waste management mechanisms and public participation. It also outlines provisions for compliance and enforcement of the Act. All projects established in the country need to adhere to the provisions of the Act, as it is a framework environmental law.

3.2.3 Waste Regulations, 2000

They regulate the management of all types of waste in Eswatini. It outlines the functions of the Eswatini Environment Authority and local authorities. It outlines provisions for the storage, collection and disposal of waste in urban areas as well as in waste control areas (in non-urban

areas). It outlines requirements for carriage, and general management of waste as well as obligation for different types of wastes.

3.2.4 Environmental Audit, Assessment and Review Regulations, 2000

It states the processes and criteria for project screening, categorization and public participation for new projects. It spells out the requirement for environmental audits for operations that are cause for concern for the EEA. The process and formats for compilation of environmental audits, Environmental Impact Assessments, Initial Environmental Evaluation and Comprehensive Mitigation Plan. The assessment and review process of this report is guided by these regulations.

3.2.5 Air Pollution Control Regulations, 2010

These regulations are aimed at controlling emissions into the atmosphere. They outline responsibilities for operators, the meteorology department, and the Eswatini Environment Authority in air pollution control. They provide air quality standards for the most common air pollutants.

3.2.6 Water Pollution Control Regulations, 2010

These regulations control discharges made into water bodies. They outline responsibilities for operators, water authorities and the Eswatini Environment Authority in water pollution control. They provide water quality objectives as well as effluent standards.

3.2.7 Litter Regulations, 2013

These regulations prohibit littering. They seek to discourage littering in the country. These regulations authorize the EEA to appoint litter wardens to ensure that the regulations are enforced. During project implementation, there may be litter generated in the project sites. These regulations would need to be adhered to.

3.2.8 The Teaching Service Act, 1982

This act established the Teaching Service Commission and outlines its power in managing the teaching profession in the country. It outlines the qualification and terms of service for the commission until pension. This act is relevant to this project as it is the TSC that will have to be involved in issues to do with human resource capacity needs in the project, especially in Component 2.

3.2.9 Free Primary Education Act, 2010

This act introduced free Primary education for all pupils in Eswatini. It indicates that free education is a right for all children in primary school. It spells out procedures for non-Swazi

students to qualify for free primary education. It outlines the responsibility of government, teachers and parents in the successful implementation of free primary education. This act is particularly relevant in the project, especially component 2.

3.2.10 Education Act, 1981

This act establishes the National Education Board whose functions is to make recommendations to the Minister and advise him regarding the establishment and planning of schools and classes, the qualifications of teachers to be employed in such schools and classes, the subjects to be taught in them and the general conduct and discipline of such schools or classes. The Act considers both formal and non-formal education.

3.2.11 The Water Act, No. 7 of 2003

This Act seeks to harmonize the management of water resources in the country. Its provisions include the establishment of a National Water Authority and of a Water Resources Master Plan. Some sub projects may require the use of water. The permission for utilization of water sources will be issued under this act. In addition, where there are subprojects that involve the discharge of water into the environment, approval processes will be governed by this act.

3.2.12 Occupational Health and Safety Act, 2001

This Act outlines the responsibilities of employer, employee and the government in occupational health and safety issues. It establishes a tripartite advisory committee to advise the Ministry of Labour on these issues. Occupational health and safety are not the sole responsibility of the employer. The employees, through the health and safety committee, should also contribute toward application of the occupational health and safety standards.

3.2.13 The Eswatini National Trust Commission Act No.9 / 1972.

This Act established the Eswatini National Trust Commission (ENTC) which is a corporate body established by the ENTC Act of 1972. The ENTC's key objectives are to preserve the cultural heritage and to conserve the natural heritage of the Kingdom of Eswatini. It emphasizes the irreplaceable value of the national heritage. The Commission is charged with the general supervision and control of the Eswatini Centre and other declared institutions, national parks, nature reserves, monuments, relics and antiques. If, during project implementation, items of cultural significance are discovered, the Eswatini National Trust Commission needs to be involved.

3.2.14 Public Health Act, 1969

This Act makes provisions for public health and for incidental or connected matters. It lists communicable diseases and outlines procedures for their management. During the

implementation of this project, there may be incidences of communicable diseases, including some waterborne diseases. The procedures outlined in this act may then be used.

3.2.15 The Eswatini Administration Order No. 6/1998

This is an Order-in Council to provide for the administration of Eswatini affairs. Section 25 of the Order provides for the *iNgwenyama* to issue, inter alia orders regulating the following as long as they do not conflict with any other law in force in Eswatini: preventing the pollution of any water resources, and the obstruction of any water course; prohibiting, restricting or regulating the cutting of trees; controlling the sale, supply, use, possession or cultivation of noxious plants; regulate the burning of grass or bush; preventing soil erosion and for the protection and construction of anti-soil erosion works; and providing for the protection and preservation of game and the destruction of vermin. During the operational phase of the project, there is potential for soil erosion and pollution of water resources, which makes this administrative order relevant to the project.

3.2.16 The Employment Act 5, 1980

Among other things, the Act prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself/herself voluntarily (forced labour). This Act also prohibits all forms of child labour and provides conditions for employment of women.

3.2.17 The Workman's Compensation Act 7, 1983

This Act provides for the compensation and medical treatment of workmen who suffer injury or contract diseases in the course of their employment.

3.2.18 The Industrial Relations Act 2000 (as amended)

Among other things, safeguard and maintain cordial working relationship between employers and workers. It also seeks to give effect to the collective bargaining, amongst other purposes. Section 4 (c) to (e) of the Act allows for the collective negotiation of terms and conditions of employment.

3.2.19 The Children's Protection and Welfare Act 6, 2012

This Act prohibits employment of children and sets 15 years as the national minimum age of employment of children. The Act also safeguards children from performing hazardous duties while in employment.

3.2.20 The Police Service Act of 2019

The Act provides policing and security services in and throughout the kingdom of Eswatini. Among other things, according to the Police Service Act 2018: Section 9(1), the Police are to

protect life and property as well as render assistance to members of the public where possible or appropriate including mediation and counselling in domestic violence and other matters. All security matters are the prerogative of the Police.

3.2.21 COVID 19 Regulations, 2020

These regulations outline steps and precautions that individuals as well as companies need to adhere to these regulations. These measures include mandating the wearing of face masks for the public, social distancing and provision of sanitizing facilities for all commercial establishments*.* All projects and establishments need to adhere to these regulations since COVID 19 has been declared a national disaster.

3.2.22 Sexual Offences and Domestic Violence (SODV) Act, 2018[6]

This Act seeks to make provision concerning sexual offences and domestic violence, prevention and the protection of all persons from harm from other sexual acts and acts of domestic violence and to provide for matters incidental thereto. It defines sexual offences (Rape, incest, Sexual assault, sexual harassment, stalking, amongst others) and prohibits commercial sexual activities. it also outlines special offences against vulnerable groups (children, people living with disabilities. The Act also outlines procedures for reporting and investigation of offences under the Act. Workers on site may be exposed to abusive environments on site or off site. The act is relevant to all people in the country. Cases of sexual exploitation and abuse, as well as domestic violence, should be managed in accordance with this act.

3.3 Relevant National Policies

3.3.1 National Education and Training Sector Policy 2018

The mission of this policy is to ensure equitable access to inclusive, life-long quality education and training for all Swazi citizens, through sustained implementation and resourcing of a comprehensive education and training policy. The goal of the education and training sector the provision of an equitable and inclusive education and training system that affords all learners access to free and compulsory basic education and senior secondary education of high quality, followed by the opportunity to continue with life-long education and training, so enhancing their personal development and contributing to Eswatini's cultural development, socio-economic growth and global competitiveness. The policy rationales, goals and objectives and strategies under systemic development are categorized under three main sector-wide headings: institutional development, curriculum development and teacher

[6] Eswatini government, 2018, downloaded from http://www.gov.sz/images/DPMOFFICE/THE-SEXUAL-OFFENCES-AND-DOMESTIC-VIOLENCE-ACT.pdf

development. This policy is one of the key pillars that support this project. However, child labour elimination and prevention strategies are not included in the Eswatini Education and Training Sector Policy.

3.3.2 The National Youth Policy, 2015

This policy addresses the participation of the country's youth in policy formulation in public policies that affect the youth. It was established with the ultimate aim of improving outcomes for young people in Eswatini, and their participation in the country's economy. It provides a review that seeks to answer the questions: to what extent are youth issues integrated in Eswatini's national policy frameworks? To what extent are these policies being implemented? What gaps exist between the aspirations of young people, the content of policies, and the realities experienced by young people in Eswatini? To this end, this report outlines a series of recommendations that are designed as a guide and challenge to policy makers and those responsible for the services that affect young people's lives. It is hoped that these recommendations will inform and influence policy-level decision-making processes, with the ultimate aim of improving outcomes for young people in Eswatini.

3.3.3 Poverty Reduction Strategy and Action Plan, 2006

The PRSAP aims to reduce the incidence of absolute poverty from 69% in 2001 to 30% in 2015 and to totally eradicate it by 2022; creation of an environment that will empower the poor to participate actively in development initiatives; empowering the poor to generate income and reduce inequalities; fair distribution of benefits through the fiscal policy; human capital development; and, improving governance and strengthening of institutions. The project aligns well with the latter aims of the PRSAP.

3.3.4 Draft National Climate Change Strategy and Action Plan, 2014

To enhance the adaptive capacity of Eswatini to climate change in order to achieve sustainable development and contribute to the better quality of life for the Eswatini nation.

3.3.5 National Water Policy (draft) 2011

To achieve sustainable development and management of water resources in the country through integrated planning. The project during implementation will make use of water resources.

3.3.6 National Development Strategy, 1997

By the year 2022, the Kingdom of Eswatini aims to be in the top 10% of the medium human development group of countries founded on sustainable economic development, social justice

and political stability. This is relevant to the project because has inter-linkages that involve human capital development and education.

3.3.7 The National Environmental Health Policy (2002)

This policy seeks to ensure a safe environment, health and sustainable development for the promotion and sustenance of good health and improved quality of life for all people in Eswatini, whatever their financial resources or place of domicile.

3.3.8 National Gender Policy, 2010[7]

This National Gender Policy is aimed at redressing the inequities between women and men. It provides a vision to improve the living conditions of women and men including practical and forward-looking guidelines and strategies for the implementation, monitoring and evaluation of the related constitutional provisions. The National Gender Policy provides guidelines, indicators and a framework to assist stakeholders to achieve gender equity as provided for in the Constitution of the Kingdom of Swaziland and other relevant international instruments that the country has ratified. The policy is meant to create strategic synergies with various stakeholders to facilitate effective and efficient implementation of commitments that will make a difference in the lives of all people at all levels. The recruitment and management of workers for the project should take into consideration gender equity.

3.4 Relevant Multilateral Agreements

Eswatini is a signatory a number of international treaties that may be relevant to the project.

3.4.1 Convention on International Trade Against Endangered Species (CITES)

The Convention on International Trade in Endangered Species of Wild Fauna and Flora is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

3.4.2 The Ramsar Convention for the conservation and sustainable utilization of wetlands

The Ramsar Convention (formally known as the Convention on Wetlands of International Importance, especially as Waterfowl Habitat) is an international treaty for the conservation and sustainable utilization of wetlands, recognizing the fundamental ecological functions of wetlands and their economic, cultural, scientific, and recreational value. Activities of

[7]Eswatini Government, National gender policy, downloaded from http://www.gov.sz/images/dpm/gender/national%20gender%20policy%20(2).pdf on 30 July 2010

subprojects may have impact on wetlands, which are environmentally sensitive areas like wetlands. These activities will have to adhere to this convention.

3.4.3 The 1992 United Nations Framework Convention on Climate Change (UNFCCC)

The primary purpose of the convention is to establish methods to minimize global warming and in particular the emission of the greenhouse gases. The UNFCCC was adopted on 9th May 1992 and came into force on 21st March 1994. The Convention has been ratified by 189 states. Eswatini ratified the Convention on 30th August 1994. EEA is the focal point for the Convention. The project will involve the use of power for pumping. The source of this power has an impact on the emission of greenhouse gases which contribute to climate change.

3.4.4 Convention on the Rights of the Child

The Convention on the Rights of the Child (CRC), 1989 is the most comprehensive compilation of international legal standards for the protection of the human rights of children. The CRC is also the most widely ratified international human rights treaty, ratified by all countries in the world, with the exception of one (the United States). The Convention acknowledges children as individuals with rights and responsibilities according to their age and development (rather than the property of their parents or as victims), as well as members of a family and community. Underlying the Convention are four main principles: non-discrimination, the best interests of the child, the right to life, survival and development and the right to participation. The recruitment of labour in this project should comply with this Convention by prohibiting the employment of children.

3.4.5 Convention on the Elimination of all forms of Discrimination against Women

The Convention on the Elimination of all forms of Discrimination against Women (CEDAW) places explicit obligations on states to protect women and girls from sexual exploitation and abuse. Universal Declaration of Human Rights (Article 7), the UN Charter (Articles 1, 13, 55, and 76) and the International Covenant on Civil and Political Rights (Article 24) reaffirm the freedoms and rights of all children, including internally displaced children. The project has to ensure that women and girls are protected from all forms of abuse, sexual exploitation and discrimination.

3.4.6 The Basel Convention

It is an international treaty that was designed to reduce the movements of hazardous waste between nations, and specifically to prevent transfer of hazardous waste from developed to Less Developed Countries (LDCs). It does not, however, address the movement of radioactive

waste. The Convention is also intended to minimize the amount and toxicity of wastes generated, to ensure their environmentally sound management as closely as possible to the source of generation, and to assist LDCs in environmentally sound management of the hazardous and other wastes they generate. Due to the fact that the country does not have a hazardous waste disposal site, all hazardous waste that may be produced will be transported and disposed of under the guidance of this convention, until environmentally sound disposal is effected and certified.

3.4.7 Stockholm Convention on Persistent Organic Pollutants (POPs)

This is an international environmental treaty, signed in 2001 and effective from May 2004, that aims to eliminate or restrict the production and use of persistent organic pollutants. Key elements of the Convention include the requirement that developed countries provide new and additional financial resources and measures to eliminate production and use of intentionally produced POPs, eliminate unintentionally produced POPs where feasible, and manage and dispose of POPs wastes in an environmentally sound manner. Precaution is exercised throughout the Stockholm Convention, with specific references in the preamble, the objective, and the provision on identifying new POPs. The project will not be using any POPs, but unintended POPs can be generated during burning of waste, especially one that contains plastic.

3.4.8 ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182) in 2002.

This Convention, among other things, stipulates the minimum age a child can enter employment and also ensure that minimum age provisions extend to all children, including those working in agriculture and domestic service

3.4.9 African Charter on the Rights and Welfare of the Child in 1992

Is a regional human rights treaty adopted in 1990 and which came into force in 1999. It sets out rights and defines principles for the status of children. The African Charter can be a powerful tool to hold governments accountable for ending child marriage and forced labour.

3.5 Key Institutions Relevant to the project

The following are the key institutions relevant for the implementation of the project and management of environmental and social risks and impacts. A detailed outline of the institutional arrangements for implementation and management of the Environmental and Social risks for the project components are presented in Chapter 8 below.

3.5.1 The Ministry of Education and Training

The primary mandate of the Ministry of Education and Training is to provide access to relevant quality education, at all levels, to all Swazi citizens, considering all issues of efficacy, equity and special needs. The Ministry's vision is 'attainment of equality in educational opportunity for all pupils of school going age and adults irrespective of their socio-economic background, with the ultimate goal of enhancing their productive capacity, thus improving the quality of their lives. MoET is the government ministry that will be responsible for coordinating the implementation of this project. Component 2, and component 3 (a major part) in the project fall within the responsibility of MoET.

3.5.2 Deputy Prime Minister's Office

The Deputy Prime Minister's Office exists to set up and oversee a national policy and institutional environment that support effective delivery of government services through a well-coordinated system with a special emphasis on a comprehensive social welfare system; gender mainstreaming; children's issues as well as proactive disaster preparedness within the development discourse. In the context of the project, DPMO is responsible for gender and family issues and coordination of children's policies. This government department is a major institution in component 1 and Component 2 of this project.

3.5.3 Ministry of Health

The Ministry of Health has the mandate to improve the health of the people of Eswatini by providing leadership in the production, delivery and utilization of health services which will consistently increase longevity and quality of life. The Ministry of Health is very critical in early childhood development and adolescent health. Therefore, this ministry is key in Component 1 and Component 2 of this project.

3.5.4 Ministry of Tinkhundla Administration and Development (MTAD)

MTAD's mandate is to create an enabling environment for effective service delivery at Regional and Tinkhundla level and to enforce good governance practices, inclusive development and balanced regional development. The Ministry has different departments, amongst which is the decentralization department. For projects and programmes to be successfully implemented in rural areas, this ministry is important.

3.5.5 Eswatini Environment Authority

The key institution involved in the management of environmental and social impact assessments (EIA) is the Eswatini Environment Authority (EEA). The EEA, created by an Act

of Parliament in 1992, and reconstituted in 2002 is directed by a management board that sets policy priorities. The main functions of the EEA are to:

- Establish standards and guidelines relating to the pollution of water, land and air as well as those relating to noise and other forms of environmental pollution.
- Develop, in cooperation with other government authorities, economic measures to encourage environmentally sound and sustainable activities.
- Promote training and education programmes in the field of the environment to create national awareness of environmental issues.
- Ensure the observance of proper environmental and social standards in the planning and execution of all development projects, including those already in existence, that are likely to interfere with the quality of the environment.
- Initiate measures for the coordination and enforcement of environmental protection legislation.

The World Bank Environmental and Social Framework will be applied with the national legislation, policies and guidelines for environmental and social management under the EEA.

3.6 World Bank Environmental and Social Framework

The 10 Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF) set out the requirements for the GoKE (Borrowers) relating to the identification and assessment of environmental and social risks and impacts associated with the project to be supported by the Bank through Investment Project Financing (IPF). The following Environmental and Social Standards (ESSs) are relevant to the project:

3.6.1 ESS1 Assessment and Management of Environmental and Social Risks and Impacts

This standard sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs). ESS1 applies to all projects supported by the Bank through Investment Project Financing and is therefore applicable in this project. The approach to assessing and managing environmental and social risks in the preparation of the ESMF associated with this project will be guided by this standard. preparation of the ESMF is in line with this standard.

3.6.2 ESS2: Labour and Working Conditions

This standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. This standard is relevant to the project as the project involves hiring of direct and indirect workers and consultants. Annex J includes Labour Management Procedures that are in line with this standard.

3.6.3 ESS3: Resource Efficiency and Pollution Prevention and Management

This standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life-cycle. Part of the Environmental, Health and Safety Guidelines to be used in identification of risks include an assessment to the use of land, water and energy resources. This standard is relevant to the project. Sub-component 2.2: Improve the quality of Mathematics and Science instruction in secondary education, will finance the procurement of some ICT equipment (interactive projectors, whiteboards, laptops) and solar panels. This activity will potentially result in the generation of e-waste, hazardous waste and solid waste. It is important that implementing agencies involved, have systems to minimize and manage e-waste efficiently by reuse/recycling, and disposing of in an environmentally appropriate manner. The ESMF includes a Waste Management Plan (WMP) with applicable technical guidelines on how to manage e-waste and hazardous waste including safe storage, collection, transport, reuse, recycling, and disposal.

The project will not be a significant user of water, apart from tanking of water to ECCDE centres that do not have piped water under Sub-component 1.2: Improve the quality of ECCDE services in targeted centres.

3.6.4 ESS4: Community Health and Safety

This ESS addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. This standard is relevant to the project. Sub-component 2.2: Improve the quality of Mathematics and Science instruction in secondary education, will finance the

procurement of some ICT equipment (interactive projectors, whiteboards, laptops) and solar panels. This activity will potentially result in the generation of e-waste, hazardous waste and solid waste. It is important that implementing agencies involved have systems to minimize and manage e-waste efficiently by reuse/recycling, and disposing of in a safe and environmentally appropriate manner. It not managed properly, potential downstream impacts of the project include community health and safety risks related to exposure to electronic wastes (e-wastes) and hazardous waste. The ESMF includes a Waste Management Plan (WMP) with applicable technical guidelines on how to manage e-waste and hazardous waste including safe storage, collection, transport, reuse, recycling, and disposal. Issues of community health are included in chapter 5 of this ESMF as per the environmental and health guidelines.

3.6.5 ESS10: Stakeholder Engagement and Information Disclosure

This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. This standard is relevant to the project. A Stakeholder Engagement Plan (SEP) will be prepared as a separate document to ensure that the project is in line with this standard.

3.7 Environmental and Social Risk Classification (ESRC)

The overall E&S risk classification for the project is “low”. The classification has considered the E&S risks and impacts of the proposed activities and the institutional capability of responsible implementation partners.

3.7.1 Environmental and social risk rating

The environmental risk rating is low due to the nature of the proposed activities. Overall, the project activities are focusing on capacity building and technical assistance type of activities. These include strengthening coordination and regulation of Early Childhood Care Development and Education (ECCDE) services and improving access to quality ECCDE services under Component 1; and project management, capacity building and technical assistance under Component 3. The Project will not support development of any physical infrastructure. However, under Sub-component 2.2: Improve the quality of Mathematics and Science instruction in secondary education, there will be some activities involving procurement of some ICT equipment (interactive projectors, whiteboards, necessary software, and ancillary equipment). Additionally, under the same subcomponent, the Project will support the procurement of solar panels for schools which do not have access to electricity. The repairs,

servicing and end-of-life disposal of ICT equipment and solar panels may result in environmental risks related to electronic wastes (e-wastes), hazardous waste and solid wastes if not managed appropriately. Environmental best practices shall be in place for managing repairs and end-of-life disposal of ICT equipment and solar panels involved in the online training programme. The type and amount of such equipment required, the associated cycle of replacement or upgrades, existing e-waste, hazardous and solid waste management measures in project implementing entities, regulatory framework, and in-country capacities, vendors, agencies to manage end of life disposal of electronic equipment, solar panels and parts will be analyzed during project preparation. As such, and to ensure the management of e-waste and other hazardous waste, the ESMF includes a Waste Management Plan (WMP) proportionate to the level of risk. The WMP includes some simple technical guidelines on how to manage and arrange for the disposal of ICT equipment and solar panels (end-of-life and during repairs).

Overall, the proposed project activities are not expected to have any significant adverse impacts on the environment and human health. No long-term or irreversible adverse impacts are expected from project implementation. The potential adverse environmental impacts are minimal. The project is associated with environment, health and safety risks due to the proposed activities that include:

- Depletion of water resources
- Water pollution
- Wastewater Discharge
- Occupational Health and Safety
- Safety and security risks

The screening checklist presented in Annex B also indicates some activities that may need to be excluded from the project scope if they have the potential to, for example, cause significant changes or degradation of critical natural habitats or make the quality of surrounding surface water worse. As such, the impacts associated with the project are likely to occur away from environmentally sensitive areas.

The likely impacts associated with project implementation are outlined in Section 5 of this report, together with the measures to manage these risks. The Simple Environmental Management Technical Manual presented in Annex F also provides good practice guidelines for avoiding and/or managing environmental risks during project implementation.

In addition, during sub-project implementation, project specific environmental and social plan will be prepared to ensure that any environmental and social risks not identified during this stage will be identified and managed through the implementation of mitigation measures, in order to ensure that sub-projects do not inadvertently lead to adverse environmental impacts.

Implementation of appropriate risk mitigation measures will be led by MoET. Moreover, periodic monitoring and annual evaluations will be conducted to determine whether the measures proposed in the ESMPs for the subproject components are being implemented effectively.

3.7.1 Social risk rating

The main objective of the project is to improve access, completion and quality of basic education, skills training and support services for girls, boys and the youth in the country. As such, it is anticipated that the project will bring about more beneficial or positive social impacts.

However, the social risk rating is **low** because the implementation includes minimal, negligible risk to people or environment. Possible social impacts of the project are outlined in section 5 of this report.

The potential social risks and how they are to be managed during project implementation has been outlined in Section 5. In addition, engagements will be undertaken with disadvantaged or vulnerable groups, as indicated on the SEP for this project, in order to ensure that the concerns or opinions of disadvantaged or vulnerable individuals or groups is taken into account during the project cycle. The project will also utilize a Grievance Mechanism that aims to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Hence, all social related complaints or concerns that arise during project implementation will be attended to.

3.8 Environmental and Social Commitment Plan

An Environmental and Social Commitment Plan (ESCP) has been prepared and consulted on, which considers the need to ensure adequate budget, staffing and operational arrangements for Project E&S risk management.

3.9 Stakeholder Engagement Plan

The MoET has prepared a Stakeholder Engagement Plan (SEP) which serves the following purposes: (i) stakeholder identification and analysis; (ii) methods for stakeholder engagement, including effective communication tools for consultations and disclosure; (iii) defining roles and responsibilities of different actors in implementing the Plan and (iv) a grievance redress mechanism (GRM). Provisions have been included to reach and meaningfully engage

vulnerable and disadvantaged groups (elderly, children who are high risk such as those who are malnourished, poor households, ethnic minorities, resident in rural areas, people living with a disability, female-headed households and others).

3.10 Gap Analysis

A comparative Analysis of Applicable ESSs and Eswatini's National Regulations is presented in the Table 2 below. For the majority of disciplines, where there is a difference between National Eswatini's standards and World Bank ESF, the Bank ESF will prevail.

Table 2: Comparative analysis of the World Bank ESSs and Eswatini National Regulations

ESS Objectives	Key Relevant National laws and requirements	Gaps
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts (ESS1)		
Conduct environmental and social assessment of the proposed project, including stakeholder engagement	**Environment Management Act No 5 of 2005** provides for subjecting proposed projects to Environmental and Social Impact Assessment (ESIA) studies as a mechanism for identifying, evaluating and managing environmental and social impacts of projects. **The Environmental Audit, Assessment and Review Regulations (EAARR), 2000**, issued under the Swaziland Environmental Authority Act, 1992, and the Environment Management Act, 2002, underline processes that must be taken for any proposed project in order to predict and evaluate likely environmental impacts under studies such as the ESIA. It also provides guidelines for risk categorization of development projects.	Project categorization is not as broad as the ESF; therefore, some in-between projects may be under or over categorized. National laws do not explicitly address the mitigation hierarchy. However, prevention and avoidance are addressed through the analysis of alternatives. A significant gap is that national laws do not address compensation and offset level of the mitigation hierarchy. National laws and regulations do not address the risk that adverse impacts will fall on disadvantaged on vulnerable people.
Undertake stakeholder engagement and disclose appropriate information in accordance with ESS10	**The National Constitution of Eswatini** calls for citizen consultations for purposes of participation in decision-making and information dissemination. **The Environmental Management Act No. 5 of 2002** Section 38 (1) provides that for the purpose of making a regulation under this section, the Minister may in writing order any person to disclose specified relevant information.	There are no significant gaps between these ESS requirements and the various national laws during project preparation phases. However, there are no clear regulations on how to assess the level of stakeholder interest and support for a project. Moreover, there is no explicit mention of stakeholder engagement

ESS Objectives	Key Relevant National laws and requirements	Gaps
	The Environmental Audit, Assessment and Review Regulations, 2000 requires stakeholder consultation during the ESIA preparation process. Specifically, during the scoping phase, the proponent must conduct stakeholder consultation. In addition, documents prepared are required to be circulated for access to stakeholders.	during implementation / construction and operation phases.
Develop an ESCP, and implement all measures and actions set out in the legal agreement including the ESCP	The provisions in some of existing Laws, Regulations and Procedures align with the values and principles of the Environmental and Social Commitment Plan as provided in the World Bank ESF. These are listed below: • The Environmental Audit, Assessment and Review Regulations, 2000 • Environment Management Act No 5 of 2002 • Waste Regulations of 2000	National legislation does not address the development of ESCPs.
Conduct monitoring and reporting on the environmental and social performance of the project against the ESSs	**Environmental Audit, Assessment and Review Regulations, 2000** Section 16 (1) emphasizes that a "person to whom an environmental compliance certificate is issued shall be responsible for implementing the CMP which forms part of the environmental compliance certificate, and for monitoring the environmental impacts of the project and the implementation of the CMP". **Environment Management Act No 5 of 2002** Section 29 provides for bi-annual publication of The State of the Environment (SoE) Report detailing information on the environment in Eswatini and, in particular, on the quality of the environment, and without limiting its generality,	No gap
ESS 2: Labor and Working Conditions (ESS2)		
Working conditions and management of management-worker relationships for direct workers, contracted workers, community workers, and primary supply workers	**The Occupational Safety and Health Act 9, 2001** • This Act provide for the safety and health of persons at work and at the workplace and for the protection of persons other than persons at the workplace against hazards to safety and health arising out of or in connection with the activities of persons in the workplace and to provide for other matters incidental thereto. • Section 9 – entrusts the employer to ensure the safety and health of all its employees, and also to; • Mitigate risks of exposure to danger of its workforce; • Provide personal protective clothing or equipment to employees exposed to wet, dusty, noisy or any conditions that might expose the employees to harsh or dangerous conditions; • Train its workers to perform their work in order to avoid exposure to danger or injury; and • Inform employees of any known hazards or disease associated with the work.	There are no significant gaps between ESS 2 requirement and various national laws. The entire set of national laws and regulations cover all the requirements of ESS2.

ESS Objectives	Key Relevant National laws and requirements	Gaps
	The Factories, Machinery and Construction Works Act 17, 1972 This legislation provides for the registration of factories and the regulations of working conditions and the use of machinery at factories, construction works and other premises and for matters incidental thereto. **The Employment Act 5, 1980 (Part XIV) – Forced Labour** Section 144 – prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself/herself voluntarily. Section 147 – states that, if any person acting in an official capacity coerces any person under his charge, that person shall be held personally liable and shall be liable to a fine not exceeding E3,000.00, or imprisonment not exceeding one year or both. **The Workman's Compensation Act 7, 1983** This Act provides for the compensation and medical treatment of workmen who suffer injury or contract diseases in the course of their employment. **The Industrial Relations Act 2000** (as amended) was enacted to, among other things, safeguard and maintain cordial working relationship between employers and workers. It also seeks to give effect to the collective bargaining, amongst other purposes. Section 4 (c) to (e) of the Act allows for the collective negotiation of terms and conditions of employment.	
Protection of work force (child & forced labour)	**The constitution of the Kingdom of Swaziland Act** 2005 Section 17 (2) provides that "A person shall not be required to perform forced labor." **The Employment Act 5, 1980 (Part XIV) – Forced Labor S144** Prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself/herself voluntarily. Section 147 – states that, if any person acting in an official capacity coerces any person under his charge, that person shall be held personally liable and shall be liable to a fine not exceeding E3,000.00, or imprisonment not exceeding one year or both. • The Country ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labor Convention (C182) in 2002. It also signed the African Charter on the Rights and Welfare of the Child in 1992 but has not yet ratified it. **The Employment Act 1980**	There are no significant gaps between this ESS 2 requirement and various national laws in Eswatini. The national legislation and ratified international treaties adequately cover the requirements of the standard.

ESS Objectives	Key Relevant National laws and requirements	Gaps
	• Section 97 – Prohibits the employment of children below the age of 15. • Section 101 to 107–provides conditions for employment of women **The Children's Protection and Welfare Act 6, 2012** • Section 234 – Minimum age of engagement for children is 15 • Section 236 – children below the age of 18 cannot be engaged in any form of hazardous employment • Section 248 – any person who employs under age children I liable on conviction to a minimum fine of E100,000.00 or 5 years' imprisonment or both for a first offender. For a second offender, it is imprisonment of not less than 10 years.	
Grievance Redress Mechanism provided for all direct and contracted workers	**The Constitution of Eswatini, 2005** Section 32 (2) on the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation. The Code of Good Practice: Resolution of Disputes at the Workplace which is in terms of Section 109 **of The Industrial Relations Act 2000 (as amended)** at Clause 4.2 requires employers to establish a fair and effective disciplinary procedure in the workplace, which should be in line with Clause 11 (Fair Procedure).	There are no significant gaps between ESS 2 requirement and various national laws of Eswatini. The Industrial Relations Act of 2000 covers most of the terrain as far as adherence to ESS2 is concerned. While the laws promote non-discrimination at workplaces, there is explicit statements on protection for vulnerable groups.
Occupational Health and Safety (OHS) requirements	**The Occupational Health and Safety Act, 2001** Section 9 provides for the duties of employers which include ensuring the safety and health of all employees during employment by securing safe and healthy working conditions in that workplace. Section 11 provides for the duties of employees which include cooperating and following instructions given by the employer in keeping the working conditions safe and without risk to health and injury in the field of that activity. **Factories, Machinery and Construction Works Act, 1972** The Act provides for the protection of workers' health from harmful effects such as fumes, dust, excessive noise and other harmful impacts. This is applicable to contractors as well. **The National Environmental Health Policy (2002)** seeks to ensure a safe environment, health and sustainable development for the promotion and sustenance of good health and improved quality of life for all people in Eswatini, whatever their financial resources or place of domicile.	There are no significant gaps between these ESS 2 requirements and various national laws.

ESS Objectives	Key Relevant National laws and requirements	Gaps
Ensure contracted workers are legitimate, reliable and have in place appropriate labour management procedures applicable to project.	**Employment Act of 1980**: Parts IV and V of the Act deals with employment contracts which ensures that contracts entered to between employers and workers are valid and their termination is done within ambits of the law. **Industrial Relations Act of 2000**: Guarantees rights of workers and their protection in employment contracts with employers. Moreover, workers enjoy the right for collective bargaining which protects workers from individual treatment within workplaces.	There are no significant gaps between this ESS 2 requirement and various national laws.
Ensure community workers are voluntary, as an individual choice or community agreement	**The Constitution of the Kingdom of Swaziland Act 2005** Section 17 (2) provides that "A person shall not be required to perform forced labor". **The Employment Act 5, 1980 (Part XIV) – Forced Labor** Section 144 – prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself/herself voluntarily. Section 147 – states that, if any person acting in an official capacity coerces any person under his charge, that person shall be held personally liable and shall be liable to a fine not exceeding E3,000.00, or imprisonment not exceeding one year or both.	There are no significant gaps between this ESS 2 requirement and various national laws.
Identify potential risks of child labour, forced labour and serious safety	**The constitution of the Kingdom of Swaziland Act 2005** Section 14 (1) provides for protection from inhuman or degrading treatment, slavery and forced labour, arbitrary search and entry; as well as respect for rights of the family, women, children, workers and persons with disabilities. Section 17 (2) provides that "A person shall not be required to perform forced labour" **The Employment Act 5, 1980 (Part XIV)** – Section 97 Prohibits the employment of children below the age of 15. Section 144 on Forced labour prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself voluntarily. Section 147 – states that, if any person acting in an official capacity coerces any person under his charge, that person shall be held personally liable and shall be liable to a fine not exceeding E3,000.00, or imprisonment not exceeding one year or both. **The Children's Protection and welfare Act 6, 2012** Section 234 – Minimum age of engagement for children is 15 Section 236 – children below the age of 18 cannot be engaged in any form of hazardous employment	There are no significant gaps between this ESS 2 requirement and various national laws.

ESS Objectives	Key Relevant National laws and requirements	Gaps
	Section 248 – any person who employs under age children I liable on conviction to a minimum fine of E100, 000.00- or 5-years' imprisonment or both for a first offender. For a second offender, it is imprisonment of not less than 10 years.	
ESS 3: Resource Efficiency and Pollution Prevention and Management (ESS3)		
Implement technically feasible measures for improving efficient consumption of energy, water, and raw materials	**The Constitution of the Kingdom of Eswatini Act, no 5, 2005** Section 210 (2) obliges the State in the interest of the present and future generations, to protect and make rational use of its land, mineral and water resources as well as its fauna and flora, and take appropriate measures to conserve and improve the environment. In terms of Section 216(1) every person has the responsibility to promote the protection of the environment and Section 216(3) obliges the State to ensure a holistic and comprehensive approach to environmental preservation and shall put in place an appropriate environmental regulatory framework. **The Environment Management Act, 2002**, provides and promotes the enhancement, protection and conservation of the environment, as well as sustainable management of natural resources. **The Flora Protection Act, 2001** provide for the sustainable management and utilization of floral resources. **The Forests Preservation Act no 28, 1910** provide for the sustainable management and utilization of forest resources. **The Water Act, 2003**, provides for the sustainable use and management of water resources in the country as well as for the control of pollution. **The National Energy Policy, 2018** strives for adequate, affordable, reliable, quality, safe, secure and not harmful energy for all people.	There are no significant differences between this ESS 3 requirement and various national laws in Eswatini. A number of the laws are outdated and require amendment, e.g., the Forest Protection Act of 1910. However, there is a feeling that this sector is still under-regulated and needs technical improvement especially in clean energy generation and energy efficient consumption patterns.
Integrate measures for cleaner production processes	**The Environmental Audit, Assessment and Review Regulations, 2000** requires ESIA studies to be conducted as a mechanism for identification of adverse impacts on projects on the human health and environment and requires the determination of mitigation measures (avoid, minimize, mitigate, compensate) when such impacts are identified.	Gaps exist in other technical fields, which lack legislation and regulations.

ESS Objectives	Key Relevant National laws and requirements	Gaps
Pollution prevention and management of air pollution, hazardous and non-hazardous wastes, chemicals and hazardous materials, and pesticides	**Environment Management Act, 2002** Section 34 (1) provides that a person shall not without lawful authority, discharge or cause or permit the discharge of a contaminant into the environment if that discharge causes, or is likely to cause, an adverse effect. Section 41 (1) No person may collect, transport, sort, recover, treat, store, dispose of or otherwise manage waste in a manner that results in an adverse effect, or creates a significant risk of an adverse effect occurring. **The Air Pollution Control Regulations, 2010**, provide for the control of air emissions during project implementation **Ozone Depleting Substance Regulations, 2003**, provide for the elimination and avoidance of products that deplete the ozone layer. **The Waste Regulations, 2000**, under the Environment Management Act, provide for the management of solid and liquid waste disposal. They emphasize on the appropriate handling, transportation, treatment and final disposal of waste. **The Building Act, 1968**, underlines the prohibition of illegal structures and requires the removal and disposal of all waste materials in an appropriate manner during project implementation. **The Swaziland National Climate Change Policy 2016**. "The goal of this Policy is developing a sustainable, climate resilient and inclusive low-carbon green growth society. The objectives of this Policy are to: a) Provide enabling policy framework for effective implementation of climate change adaptation and mitigation measures. b) Enhance climate-resilient and inclusive low-carbon green growth investments. c) Promote public education, information and awareness on climate change. d) Provide mechanisms for coordination and building of partnerships in addressing climate change." **Water Pollution Control Regulations, 2010** provide for measures geared towards minimizing pollution of water by project activities through establishing standards. **The Natural Resources (Public Stream Banks) Regulations, 1951** prohibit project activities within 33 feet of a river or stream	There are no regulations governing greenhouse emissions but Eswatini has formulated the Eswatini Climate Change Policy 2016 as a Party to the United Nations Framework Convention on Climate Change (UNFCCC), Eswatini is required to produce and regularly update National Greenhouse Gas Inventories. There is a **l**ack of chemicals management legislation.

ESS Objectives	Key Relevant National laws and requirements	Gaps
ESS 4: Community Health and Safety		
Community health and safety measures	**The Public Health Act, 1969,** provides for the establishment of processes to ensure public health at all phases of a project. It also provides for steps to take should there be any incident from the project affecting the public and lays out responsibilities for actions to be taken. Section 6 outlines Regulations relating to communicable diseases which include controlling or prohibiting entry into, or departure from Eswatini, compulsory medical examination, detention, quarantine, disinfection, vaccination, inoculation, treatment, isolation or surveillance as may be appropriate, of such animal or thing or person, closing all or any of the borders of Eswatini for a certain period, and closing any school or any place of public entertainment, where deemed necessary for the purpose of preventing the spread of any communicable disease. **The Occupational Health and Safety Act, 2001**, provides for the safety and health of both employees and the public, especially during the construction phase of proposed projects, and specifies processes to be undertaken in order to ensure that safe and health practices are adhered to and implemented at work. **The COVID 19 regulations, 2020** provide measures to be put in place to prevent the spread of Coronavirus, which is a public health issue and global pandemic. **The Road Traffic Act, 2007,** provides for the compliance of all road users and for those organizations such as EEC conducting works on and/or along public roads. **The Waste Regulations, 2000**, under the Environment Management Act, provide for the management of solid and liquid waste disposal. They emphasize on the appropriate handling, transportation, treatment and final disposal of waste.	The Public Health Act lacks specific regulations for rural areas as it is widely applied in urban areas. Moreover, However, National laws and regulations do not have specific provisions that specifically address infrastructure and equipment design safety. The country does not have laws or regulations that specifically address emergency events. Furthermore, the Public Health Act has no specific regulations for rural areas. A legislative gap that may be noted is the absence of framework for coordinating the efforts and activities of all the institutions responsible or involved in community health and safety. Another gap exists between ESS 4 requirements and various national laws as it pertains to promotion of quality and safety, and considerations relating to climate change, in the design and construction of infrastructure.
Assessment of risks posed by direct or contracted security personnel to those within and outside the project site.	**The Police Service Act of 2019** to provide policing and security services in and throughout the kingdom of Eswatini. Among other things, according to the Police Service Act 2018: Section 9(1), the Police are to protect life and property as well as render assistance to members of the public where possible or appropriate including mediation and counselling in domestic violence and other matters. All security matters are the prerogative of the Police. **The Sexual Offences and Domestic Violence Act of 2018** is applied in cases where sexual abuse and harassment has occurred which is a major risk in the use of public and private security personnel.	There are no national regulatory frameworks for engagement of private security companies or specific security personnel except requirements stipulated for license application for the establishment of security companies.
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6)		

ESS Objectives	Key Relevant National laws and requirements	Gaps
General Requirements Assessment of risks and impacts, conservation of biodiversity and habitats, legally protected and internationally recognized areas of high biodiversity value, Invasive alien species, Sustainable management of living natural resources	**Swaziland National Trust Commission (SNTC) Act, 1972.** This legislation safeguards the natural and cultural heritage of Eswatini, and conservation of all environmental resources. **The Environmental Audit, Assessment and Review Regulation, 2000** Section 5 provides for a submission of project briefs for all proposed projects, Section 6 provides for categorization of projects to ascertain whether the project is unlikely or likely to have significant adverse environmental impacts **The Constitution of the Kingdom of Eswatini Act, 2005,** provides that the country and all who reside in it shall protect and make rational use of its land, mineral, water resources as well as flora and fauna. It also underlines that appropriate measures need to be taken to attain sustainable living through the conservation and enhancement of the environment. **The Environment Management Act, 2002**, provides and promotes the enhancement, protection and conservation of the environment, as well as sustainable management of natural resources. **The Flora Protection Act, 2001**, provides for the protection of indigenous flora and encourages the eradication of alien and/or invasive plant species. **The Game Act, 2001**, provides for the protection of birds and mammals against any illegal and harmful activities, such as poaching. **The Plant Control Act, 1981**, provides for the control, movement and growth of plants. **The Natural Resources Act, 1951**, promotes the conservation and improvement of all living natural resources within the country. **The Water Act, 2003,** provides for the sustainable use and management of water resources in the country as well as for the control of pollution. **The Forests Preservation Act no 28, 1910** provide for the sustainable management and utilization of forest resources.	The legislation framework in Eswatini is explicit on conservation of biodiversity. However, it may need more emphasis on habitats.

ESS Objectives	Key Relevant National laws and requirements	Gaps
	Eswatini National Biosafety Act 2012 among other things, informs the handling and transboundary shipment of genetically engineered products. .	
ESS 8: Cultural Heritage		
Protect cultural heritage from the adverse impacts of project activities and support its preservation.	**The National Trust Commission Act, 1972**, provides for the operation of cultural institutions and the proclamation of national parks, monuments and matters incidental thereto. Section 15 (1) state that the objects of parks and reserves include "to promote and conserve indigenous animal and plant life and to eliminate non-indigenous animal and plant life within the area of a park or reserve", and "to protect and preserve or to restore objects of geological, archaeological, historical, ethnological and other scientific interest in the park or reserve" Section 25 (1) provides for proclamation "as a national monument, any area of land having a distinctive or beautiful scenery or geological formation, or any area of land containing a rare or distinctive or a beautiful flora or fauna, or any area of land containing objects of archaeological, historical, or scientific interest or value, or any waterfall, cave, grotto, avenue of trees, old building, or any other place or object (whether natural or constructed by man) of aesthetic, historical, archaeological, scientific, sacred, or religious value or interest". Section 16 (2) (f) (a) provides that on the recommendation of the director the Commission (ENTC) may "sell, exchange or donate specimens of the animals and plants of a park or reserve, and by purchase, exchange or otherwise acquire any animal or plant which the Commission may consider desirable to introduce into a park or reserve." **The Environmental Audit, Assessment and Review Regulations, 2000**, issued under the Eswatini Environment Authority Act, 1992, underline processes that must be taken for any proposed project in order to predict and evaluate likely environmental impacts under studies such as the ESIA. This includes cultural resources. **Environment Management Act No 5 of 2002** provides for subjecting proposed projects to Environmental and Social Impact Assessment (ESIA) studies as a mechanism for identifying, evaluating and managing environmental and social impacts of projects. This includes cultural resources.	The SNTC Act appears to be outdated to respond to emerging cultural development paradigms informed by commercialization of culture for equitable benefit sharing. Eswatini does not have requirements specific to addressing cultural heritage as an integral aspect of national sustainable development. Moreover, Eswatini does not have regulations or policies specific to consultations regarding tangible or intangible cultural heritage. Intangible cultural heritage is often neglected in ascertaining benefits and compensation where relocation of people occurs
ESS 10: Stakeholder Engagement and Information Disclosure		
Engagement during project preparation:	**The Environmental Audit, Assessment and Review Regulations, 2000** requires stakeholder consultation during the Environment and Social Impact Assessment (ESIA) preparation process. Specifically, during the scoping phase, the proponent	No significant gaps between ESS 10 requirement and the various national laws

ESS Objectives	Key Relevant National laws and requirements	Gaps
Stakeholder identification and analysis, stakeholder engagement plan, Information disclosure and meaningful consultation	must conduct stakeholder consultation. In addition, documents prepared are required to be circulated for access to stakeholders. Section 12 (1) of the EAAR Regulations also allows for public hearing during the EIA process, where - (a) after examining the Initial Environmental Evaluation (IEE) and/or Environmental Impact Assessment (EIA) report and accompanying Comprehensive Mitigation Plan (CMP) for the proposed project, it is of the opinion that the project is of such a sensitive or significant nature that the public should have the opportunity to make submissions or comments at a public hearing; or (b) the public concern over the project is great and the number of written and substantiated objections exceeds ten." Section 11 (1) of the EAAR Regulations provides for public notice of the availability of the EIA which must be published in the Government Gazette, on the Eswatini Broadcasting Service, and in a newspaper circulating in Eswatini twice a week and for two consecutive weeks. Section 15 (6) © of the EAAR Regulations states that the Authority shall publish "a detailed statement of the decision for public inspection." **The Environment Management Act No. 5 of 2002** Requires the Authority to distribute copies of the EIA and CMP to concerned and affected ministries, local authorities, parastatals, and non-governmental organizations. EAAR "Any person may request from the Minister, the Authority or any other organ of Government any information relating to the environment that is not available in the registry but that could reasonably assist that person in contributing to the enhancement, protection and conservation of the environment and the sustainable management of natural resources." Environment Management Act, 2002 Section 51.	during project preparation phase. However, there is no explicit mention of stakeholder engagement during implementation/construction and operation phase. Moreover, there no regulations or national standards guiding engagement of vulnerable groups and individuals. The national GRM frameworks, if exist, have no clear regulation on whether the scope, scale and type of grievance mechanism required is proportionate to the nature and scale of the potential risks and impacts of the project

3.11 Alignment of World Bank and Eswatini Legislation Relevant to ESIA

The following outlines how both the World Bank ESF policies and Eswatini laws are generally aligned in principle and objective:

- Both require screening/categorization of projects in order to determine whether environmental and social analysis is needed.
- Both require public participation and input to inform Environmental and Social Management report compilation processes.
- Eswatini recognizes other sectoral laws while the WB has environmental and social standards for specific issues.
- The Bank requires that stakeholder consultations be undertaken during planning, implementation and operation phases of the project. EEA requires consultations during planning and before implementation of the project. During implementation and operational phases, the public are free to bring forth any environmental, social, safety or health issue they might have as a result of the implementation of the project.
- Monitoring of projects during implementation is required by EEA and the WB.

3.12 World Bank Environment, Health and Safety Guidelines

The World Bank Group Environment, Health and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They define acceptable pollution prevention and abatement measures and emission levels in World Bank financed projects. The Project will apply the General Guidelines, including (i) Environmental, (ii) Occupational Health and Safety, and (iii) Community Health and Safety.

3.12.1 Environmental

- Air Emissions and Ambient Air Quality
- Energy Conservation
- Wastewater and Ambient Water Quality
- Water Conservation
- Hazardous Materials Management
- Waste Management
- Noise
- Contaminated Land

3.12.2 Occupational Health and Safety

- General Facility Design and Operation
- Communication and Training
- Physical Hazards
- Chemical Hazards
- Biological Hazards
- Personal Protective Equipment (PPE)
- Special Hazard Environments
- Monitoring

3.12.3 Community Health and Safety

- Water Quality and Availability
- Structural Safety of Project Infrastructure
- Life and Fire Safety (L&FS)
- Traffic Safety
- Transport of Hazardous Materials
- Disease Prevention
- Emergency Preparedness and Response

4 BASELINE ENVIRONMENT

4.1 Land Use

The Kingdom of Eswatini covers an area that is approximately 17,364 km^2 and is characterized by three types of land tenure, namely: Swazi Nation Land, Title Deed Land and Crown Land. A majority of the high-value agricultural crops (sugarcane, forestry, and citrus fruits) are grown on Title Deed Land (TDL) and leased Swazi Nation Land (SNL) where there are high levels of investments and irrigation, and high productivity. However, most of the Eswatini population, approximately 75%, resides in rural Swazi Nation Land (SNL) areas and is engaged in subsistence agriculture.[8] In Eswatini, both subsistence and commercial farmers practice livestock rearing and crop production (maize for subsistence and sugarcane for sale, respectively) which are the main sources of livelihoods in the country.

4.2 Climate

The climate of Eswatini varies from tropical to near temperate. The rain falls during summer months. Thunderstorms are prevalent in this season. The annual rainfall is the highest in the Highveld towards the westerly direction and ranges from 1000 mm to 2000 mm. However, this varies from year to year. The Lowveld, which is in the east, receives the lowest rainfall, ranging from 500 mm to 900 mm per annum (World Bank, 2015). The country receives the highest average annual rainfall in December (142 mm) and the lowest rainfall in June (8 mm). Temperatures vary according to the altitude of the regions. The Highveld region temperatures are temperate; while the Lowveld has temperatures which reach up to 40^{o}C in summer (World Bank, 2015). Eswatini receives the highest average temperatures in February (24^{o}C) and temperatures are at their lowest in winter months with an average of 16^{o}C in June (World Bank, 2015).

4.3 Topography

Eswatini is oval shaped and bestrides the dissected edge of South African Plateau. The elevation of the country decreases from west to east. There are four main geographical regions running north to south and these are (Microsoft Encarta Encyclopaedia, 2002 and Mwendera, 2003):

- The mountainous westernmost portion, the Highveld, has an average elevation of 900 m to 1400 m and in some places, it reaches an altitude of more than 1800 m above sea level;

[8] Ministry of Tourism and Environmental Affairs, State of the Environment Report, 2020

- The hilly central Middleveld has an elevation of 400-800 m;
- The eastern Lowveld is a rolling area that averages from 120 to 130 m above sea level; and
- The Lubombo Plateau bound by the Lowveld on the east.

Significant ridge areas are present in the region of the proposed project.

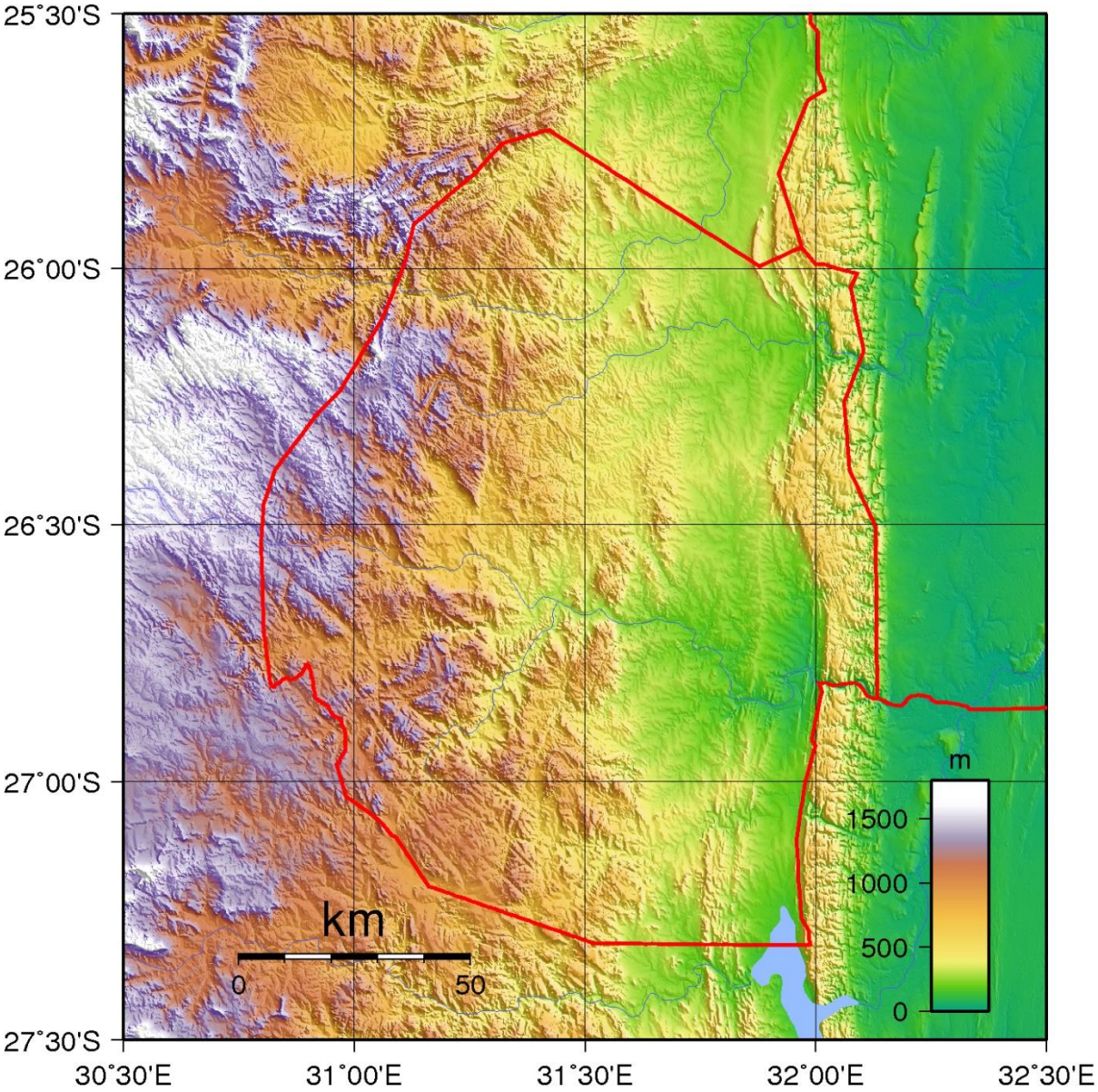


Figure 1: Topography of Eswatini

Source: Wikipedia

4.4 Air Quality

The World Health Organization considers the air quality in Eswatini to be moderately unsafe, with annual mean concentration of PM2.5 at 17 µg/m^3 which exceeds the recommended

maximum of 10 µg/m^3.[9] There is growing concern about the increasing level of air pollution, especially around industrial areas. The main air pollutants sources in the country were identified as industrial emissions, domestic use of wood and transport. There is a rapid growth in vehicles imported to the country which has increased fuel consumption which results in emission increases from the transport sector, making the urban population more vulnerable. The increase of vehicles has implications on increased greenhouse gases and smog. Other pollutants of concern include PM2.5 and POPs from solid waste and sugar cane fires. Adding to the air quality challenges is that Eswatini borders Mpumalanga province (South Africa) which is an air quality hotspot and transboundary air pollution may exacerbate the air pollution. However, the country does not monitor air pollution and regulations lack emission standards. The country's mortality rate as a result of chronic respiratory diseases is ranked second as a cause of death in the country, however this was a decrease of 27.8% since 2009. However, it is difficult to segregate diseases and solely attribute them to air quality. As a response, Eswatini is a party to global treaties in a bid to reduce the impacts of air pollution on the atmosphere, and is also engaged in several programmes (rural electrification and energy efficiency) to reduce pollution.

4.5 Biological Diversity

Major ecosystems in Eswatini have very low coverage within protected areas; overall 0.6% - 4.6%, with aquatic systems having the least coverage. In addition to this, the three terrestrial ecosystems have been reduced by at least 25% each over the past few decades with land cover change being the major factor.

4.6 Energy

The Kingdom of Eswatini imports all of its petroleum product requirements and around 70% of its power from South Africa and Mozambique, despite being well endowed with conventional and renewable energy resources, including coal, solar, hydro, wind and biomass residues from the sugar and forestry industries. The high dependency on power imports contributes greatly to the country's account deficit and increases Eswatini's exposure to energy supply risks, in terms of both supply security and price shocks. Almost 100% of the electricity generated in Eswatini is from hydropower and sugarcane-based cogeneration. Biomass (fuelwood and agricultural waste) is used mainly for household cooking and heating, as well as for co-generation in the sugar industry. Petroleum products are used mostly for transport, and paraffin and liquefied petroleum gas (LPG) are used for cooking and heating.

[9] Ministry of Tourism and Environmental Affairs, State of the Environment Report, 2020

4.7 Water Supply and Sanitation

Most of the potable water in circulation for drinking and sanitation purposes in Eswatini is abstracted from the major River basins: Mbuluzi, Usutu and Komati river basins. The water goes through Water Treatment Plants operated by the Eswatini Water Services Corporation. At a national level, 29.9% of the population has functional connection to the EWSC grid and a further 11.76% get water from community taps; 75.6% use improved sources of drinking water; 12.8% use unimproved drinking water using appropriate treatment methods and 77.43% are engaged in water harvesting. In terms of sanitation, 53.68% have access to safely managed, none shared sanitation facilities. The Shiselweni region as whole lags behind the three other national regions in terms of improved water and sanitation. The following table indicates the percentage of improved drinking water by region and percentage improved sanitation respectively.

Table 3: Improved sources of drinking water by region

Region	%To improved sources of drinking water
Hhohho	79%
Manzini	79.5%
Shiselweni	***65.7%***
Lubombo	71.9%

(Source: CSO, 2017)

4.8 Waste Management

In Eswatini local urban government authorities are mandated by law to collect, treat and dispose of solid waste. In rural areas not serviced by municipal authorities, waste management is ad hoc and often an increasing threat to the environment (land and water). It must be noted that the hotspot areas for waste generation are the cities or affluent towns, as well as peri-urban areas around these cities and towns. In summary, at a national level, the total amount of waste generated per annum is 238,341 tonnes of which 100,933 tonnes (42%) is generated in urban areas, whilst 137,409 tonnes (58%) are produced in rural areas. Of this waste, 70,086 tonnes (29%) is recycled/reused per annum, with 21,993 tonnes recycled/reused in urban areas and 48,093 tonnes recycled/reused in rural areas. Lastly, about 61,843 tonnes (26%) of waste is disposed in the country per annum. This comprises 43,980 tonnes disposed in urban areas, mainly the landfills and dumpsites, and 17,863 tonnes in rural areas.

4.9 Administrative Regions

Eswatini is divided into four administrative regions: Hhohho, Lubombo, Manzini, and Shiselweni. Each region is further divided into *Tinkhundla*. *Tinkhundla* are, in turn, divided

into smaller *imiphakatsi*. Each of the 4 Regions has a Regional Office run by a Regional Administrator who works with the Ministry of Tinkhundla Administration and Development. An *Inkhundla* Centre has a committee formed by representatives of the different *imiphakatsi* under that Inkhundla. The committee is chaired by *Indvuna yeNkhundla* (constituency headman). Each of the 59 Tinkhundla Centres is represented by an elected member of parliament who sits in the House of Assembly.

4.10 Population Size and Distribution

4.10.1 Population Age Structure

The population of Eswatini is 1,093,238 and the population density is 63 people per square kilometre, largely rural with the population of Eswatini concentrated in the Hhohho and Manzini regions. About 12 percent of the population are under the age of five[10], and with a median age of 21.7 years and 56 percent of the population below 25 years of age[11], Eswatini is one of the youngest countries in the world.

Table 4: Population age structure

Population	2007	2017	2018	2019	2030
Total Population	1,020,102	1,145,970	1,159,250	1,172,433	**1,303,090**
Male population	482,209	544,811	551,317	557,760	**620,793**
Female population	537,893	601,159	607,933	614,673	**682,297**
Percent 0-4	13.0	13.3	13.2	13.1	**11.5**
Percent 5-14	25.7	23.1	23.1	23.0	**22.6**
Percent 15-49	50.8	53.4	53.5	53.6	**54.4**
Percent 15-59	55.8	58.5	58.6	58.8	**60.6**
Percent 60+	**5.5**	**5.1**	**5.1**	**5.1**	**5.4**

Source: Swaziland Population Projection 2007 -2030

4.10.2 Population by Region and Sex

The following table presents the distribution of the population in each of the regions by sex.

Table 5: Population distribution by region and by sex

Region	Total Population Census: 2017	Male		Female	
		Total	%	Total	%
Hhohho	320, 651	158,229	49	162,422	**51**
Manzini	355,945	172,470	48	183,475	**52**

[10] Eswatini Population Census, 2017
[11] The Kingdom of Eswatini (forthcoming), Towards Equal Opportunity: Accelerating Inclusion and Poverty Reduction in Eswatini, Systematic Country Diagnostic

Shiselweni	204,111	96,000	47	108,111	**53**
Lubombo	212,531	104,412	49	108,119	**51**
Total	**1, 093,238**	**531,111**		**562,127**	

Source: CSO 2017

Fifty one percent (51%) of the Eswatini population are female whilst 49% are male (Central Statistical Office, 2017). Table 30 indicates that all the regions have a higher percentage of females than males. Shiselweni has the lowest male to female ratio (0.89), followed by Manzini (0.92). Hhohho and Lubombo have the highest ratio, both at 0.96.

4.11 Poverty levels

A majority of the population (58.90%) in Eswatini lives below the poverty line, but only 20.1% live below the extreme poverty line. The percentage working poor is 38.90%. More people living below the poverty line live in the rural areas (70.15%) than urban areas (19.55). The national poverty gap is 24.9%. Amongst the 4 regions of Eswatini, Lubombo has the highest percentage, followed by Shiselweni. Manzini has the lowest after Hhohho. The poverty gap and percentage of people living under extreme poverty follows the aforementioned trend. The areas targeted by the project have a minimum of 30% poverty rate, 12 of which have poverty rates higher than 40%. These are Maphalaleni, Mayiwane, Ntfonjeni, Hlane, Lomahasha, Matsanjeni North, Siphofaneni, Ntondozi, Matsajeni, Mtsambama, Shiselweni II and Sigwe.

4.12 Household income and consumption per Capita

The national average household income per capita is SZL1651, and the consumption average per capita is SZL1074. The percentage entrepreneurship rate is 27.69%. A majority of enterprises (66.45%) have a female decision maker. This indicates that women in Eswatini are more empowered than men to run their own businesses.

4.13 Education Levels

The country has a 91% enrolment rate for primary education. At secondary level (form 1 to 5), the enrolment rate drops to 51.25%. This may be attributed to the access to the free primary education, which then makes the literacy for the country to be 94.61%, with males having a higher literacy rate (95.64%) than females (93.77%). The average money spent on education per household is SZL1,114.54 (CSO, 2017).

Access to primary education is almost universal in Eswatini. The official starting age for children in primary school is six. Primary education is seven years, followed by three years of junior secondary and two years of senior secondary school (a total of 12 years). The table below shows some basic statistics of the education system in Eswatini as at 2017. Very little data is available on pre-primary education or Technical Vocational and Education Training (TVET) from the Annual Education Census.

Table 6: Basic education statistics, 2017

Indicators	Primary	Secondary
Number of Schools	624	285
Numbers of Students	237,500	74,000
Number of Teachers	8900	7000
Number of Students with Special Needs	7660	5220

Only 67 percent of those who start school in Grade 1 complete junior secondary education and only 44 percent complete senior secondary education.

4.14 Health

The most common illnesses and causes of death in the country are HIV/AIDS, Lower respiratory infections, lschemic heart disease, Diabetes, Stroke, Diarrheal diseases, Tuberculosis, Road injuries, Neonatal disorders, Interpersonal violence.

Eswatini has the highest rate of HIV infections in the world, with more than a quarter (27 percent) of its reproductive age population living with HIV. Those that are HIV positive are considered to be vulnerable due to stigma, orphanage, and other factors. Females are particularly at risk - 35 percent of women and adolescent girls between the ages of 15 and 49 years are HIV-positive, compared to 19 percent of boys and men in the same age group.[12] Largely, due the impact of HIV/AIDS, in 2017, about 86,000 children (or 16 percent of the total number of 0-17-year-olds in the country) were considered single or double orphans.[13] Compounding this crisis is the large number of children who are considered vulnerable due to illnesses experienced by parents, are abandoned by a parent or are living in extreme poverty resulting in a staggering 58 percent of the country's children being orphans and/or vulnerable children (OVCs).[14]

Up to 30 percent of all pregnancies in Eswatini are among adolescents. Teenage pregnancies are also a significant factor in poor outcomes and for human capital accumulation. While the adolescent fertility rate has declined in recent decades in Eswatini, at 77 births per 1,000 girls (2017), which is still very high. In addition to its negative impact on girls' education and the consequent risk of HIV, teenage pregnancy significantly contributes to maternal and child morbidity and mortality and to vicious intergenerational cycles of poor health and poverty. Early pregnancies render the teenage mothers more vulnerable.

[12] UNICEF 2019
[13] EHIES 2017
[14] https://insight.wfp.org/in-the-country-of-orphans-fc8c369dfc4f

The healthcare affordability for the country is about 80%. The average distance travelled to a health facility is 11.36 km. The national average health expenditure is SZL649.93 per year per household. Between 2013 and 2017, there was an increase in the number of health facilities across all regions. An increase of 40 health facilities from 287 in 2013 to 327 in 2017. Over the last 10 years, number of health facilities have doubled in Eswatini from 154 in 2006 to 327 in 2017.

4.14.1 Early Childhood Nutrition Support

In 2002, the Government established Neighbourhood Care Points (NCPs) NCPs to support families dealing with the HIV/AIDS crisis, as well as orphans and vulnerable children. Today, there are 1800 NCP centres located at the community level providing nutrition services for children under the age of 8. In 2019, the World Food Programme (WFP) provided feeding for 52,300 children between the ages of 2-8 years old in about 1,700 of these sites, while the Government of Taiwan supported feeding programs for children in another 30 NCPs. There are also 'Kagogo centres' (translated to 'Grandmothers' house) that were built and managed by communities, providing nutrition services for young children with support from the National Emergency Response Council to HIV/AIDS (NERCHA). In addition to these community centres, there are 224 Primary Health Care facilities in Eswatini that provide health and nutrition services to all children and a large cadre of Rural Health Motivators (RHM) that provide similar services to mothers and young children in their homes.

4.15 Disability

The total percentage of the population with impairment is at 18.13%. the table below presents a breakdown of the various disability categories.

Table 7: Impairment types

Disability	Percentage of population
Visual	11.78
Hearing	5.11
Physical	4.38
Intellectual	4.98
Self-care	1.45
Speech impairment	0.88

4.16 Economy

Economic growth has been slow and as a result of the COVID-19 pandemic, growth projections reflect a further deceleration. The annual GDP growth rate declined from a 3.2 percent in 2016 to 1.9 percent in 2017 and 0.2 percent in 2018. The economy grew by 1.4 percent in 2019 and outlook projections indicated a potential 2.6 percent growth in 2020.

However, due to the outbreak of the COVID-19 pandemic, growth projections have been muted to below 1 percent for 2020.

4.17 Employment Levels

The average unemployment for the country is 21.9%. In 2020, the estimated youth unemployment rate in Eswatini was at 47.37 percent. The high level of youth unemployment is a major concern for Eswatini if the country is to harness the demographic dividend. If measures are not taken swiftly, the country will face challenges associated with a growing and unemployed cadre of young people as the population bulge moves upward in the future. Besides the issue of unemployment, the youth is also faced with challenges threatening their health and development, such as high rates of poverty and a decline in the strength of family structures.

4.18 Access to internet

Mobile cellular subscriptions in the country have reached 1,124,386. 2G and 3G technology continue to dominate mobile network connections, largely attributed to an extensive investment in network rollout, spanning over a decade. 2G and 3G accounted for 42% of total mobile connections in March 2020 alone. The 4G/LTE connectivity, which was introduced in 2016, accounted for 15% of total mobile connectivity in the same month. Mobile broadband subscriptions increased from 724,035 in March 2019 to 849,121 in March 2020. Data and Voice mobile-broadband subscriptions, which are typically smartphone-based with voice and data used in the same terminal, account for 97% of total mobile broadband connection growth. Data only mobile subscriptions on the other hand, declined by 17 percent in 2019/20. Total Fixed telephone subscriptions is estimated at 42,702. Eswatini Mobile and MTN Eswatini are the main drivers of growth in fixed telephone subscriptions. Fixed internet broadband subscriptions are at 227,774. EPTC, the largest internet service provider with close to 50% market share, recorded a decline of 6% in subscriptions in this period. Eswatini fixed internet broadband services are mainly delivered through fixed-wired and fixed-wireless technology. Fixed-wired broadband subscriptions, namely copper and fibre, have been on a downward trend since 2017/18. Fixed-wireless subscriptions on the other hand, have been on an upward trajectory, growing by 26% from 9,731 subscriptions in FY2018/9 to 12,289 in FY2019/20, surpassing fixed-wired, which in FY2018/19 was at 12,283 from 13,082, a decline of 6%.[15]

[15] Eswatini Communications Commission, Annual Report, 2020

4.19 Gender Considerations and other vulnerabilities

More than half (52 percent in 2019) of Eswatini's population are female yet the data below shows that a woman's ability to exercise voice and agency as well as opportunities for participation in the economy and politics has been limited as follows:

- Unmet need for family planning using modern contraceptives (15-49-year-old women): 10 percent
- 48 percent of girls and women between the ages of 13 to 24 reported having experienced some form of sexual violence with 1 in 3 girls experiencing some form of sexual violence before the age of 18
- Female labor force participation rate (47 percent); Male labor force participation rate (56 percent)
- Median monthly earning of women is Emalangeni SZL1800; Median monthly earnings of men is E2500
- Women's participation in Parliament in 2018; 5 of 69 seats, i.e., 7 percent

In most rural schools, children travel long distances to school. This exposes them, especially girls, to the risk of sexual abuse on their way to and from school. This issue is exacerbated for children in child headed families where there is awareness in the community that these children would not have an adult who would stand up and protect them. In some areas where the illegal farming of dagga is rife, boys drop out of school and 'dangle' money to the girls to lure them to drop off school and marry them.

In recent years, the Government of Eswatini has made legislative reforms to further the promotion and protection of women and girls' rights. In August 2019, the Eswatini High Court ruled that the common law doctrine of marital power (giving a husband the ultimate decision-making power over his wife and the matrimonial property) is unconstitutional. The ruling builds on Eswatini's ongoing law reform process that included the passing of the Sexual Offences and Domestic Violence Act of 2018, which provides a framework to curb sexual and gender-based violence in the country. In 2018, the Election of Women Act was also enacted, designed to fulfill the constitutional requirement for quotas for the representation of women and marginalized groups in parliament.

4.20 School Infrastructure Development

The teaching of mathematics and science at the junior secondary level in Eswatini has the following main challenges:

- Shortage of qualified mathematics and science teachers.
- Inability to retain qualified mathematics and science teachers in rural schools.
- Increase in the number of unqualified teachers who lack the pedagogy/content.
- Inadequate teaching and learning materials and equipment.
- Lack of skills / confidence to confidence among teachers to use ICT in the teaching and learning process.
- Some schools lack science laboratories and equipment or laboratories do not have connection to electricity and the internet.

4.21 Sexual Abuse and Exploitation, Harassment and Gender Based Violence

According to the SWAGAA, in Eswatini violence against children, including girl children, and child sexual assault are alarmingly high. Statistics show that in Eswatini, it is expected that: one in three Swazi girls will experience some form of sexual violence by the time they are 18 years old. Almost half of Swazi women (48.2%) will experience some form of sexual violence over their lifetime. Intimate partners, such as husbands and boyfriends, are most likely to be the perpetrators of sexual violence against women, making a woman's home often a very dangerous place. Nearly 9 out of 10 children experience some form of physical or psychological abuse in the Kingdom. Gender-based violence (GBV), and particularly violence that affects women and girls, is a widespread and raging problem which will affect one in three women in their lifetime, according to global estimates published by World Health Organisation (WHO) in 2017[16]. In 2018, the Government of Eswatini enacted the Sexual Offences and Domestic Violence Act to address this problem of the Tinkhundla are earmarked for the project implementation, Mkhiweni and Sigwe have the highest percentage of child-headed families (0.44%-0.58%) and Sandleni Inkhundla has a high percentage of double orphans (2.58% to 3.45%). This makes the children in these areas more prone to sexual exploitation and may benefit less since they will likely not have parents to look out for their access to some of the project benefits.

4.22 Vulnerabilities from COVID-19 Pandemic

The COVID-19 pandemic has affected learning and accentuated the digital divide between the rich and the poor in Eswatini. All schools/institutions of higher learning were closed on 20 March 2020 as the country instituted lockdown measures. MoET responded by offering

[16] https://www.icj.org/wp-content/uploads/2020/10/Reporting-GBV-Guide-ICJSWAGAA.pdf

distance learning where possible. Access to the internet is relatively low in Eswatini, at 47 percent in 2017[17], and only some schools were able to continue teaching by using available technologies to deliver lessons through various e-learning platforms such as Google classroom, Microsoft teams, WhatsApp student portal, Zoom, YouTube, Telegram, and blackboard amongst many others. The majority of students, though, were only able to access learning programs through television, radio and print media, which the MoET had up and running within weeks of schools closing. The effectiveness of these alternative teaching methods is yet to be assessed, but there is evidently limited feedback for students in some of these learning methods.

[17] https://data.worldbank.org/indicator/IT.NET.USER.ZS?locations=SZ

5 POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS

The Chapter will describe the expected project impacts/E&S risks and potential mitigation measures to address them.

Table 8: Environmental and Social risks for operational phase

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
Environmental Risks				
Maintenance of ICT Infrastructure.	*Hazardous Waste Management* Waste may be generated by maintenance of structures and equipment. The increased use of ICT for learning may lead to the increased generation of electronic waste which consists of old computers, learning gadgets for pupils and teachers, projectors and other equipment that has come to the end of its life. In addition, in sites where solar panels will be put up, electronic waste may be generated from maintenance of solar energy infrastructure. This waste is classified as hazardous waste in the Waste Regulations, 2000. Improper management of this waste may lead to environmental degradation. The country does not have a	• Supplier contracts should ensure that it includes requiring suppliers of ICT equipment to also be responsible for removal after their lifespan. Where appropriate, rental of this equipment may be pursued. • Electronic waste should be stored in containers in a designated area, in compliance with the Waste Regulations, 2000. • Electronic Waste should then be transported to hazardous waste disposal facilities outside the country to effect environmentally sound disposal in accordance to the Basel Convention	MoET MoET MoET	Environmental Specialist Environmental Specialist Environmental Specialist

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
	facility for final disposal of electronic waste and other hazardous waste. Commencement day. These include the environmental approvals for subprojects ESMPs. A waste management plan has been developed for the management of all the waste streams of the project (refer to Annex G)			
	General Waste Management Solid waste will be generated from maintenance activities, teachers and students. Improper management of such waste may result in environmental degradation	• Waste receptacles will be provided at strategic places in each site • Recyclable waste will be separated from non-recyclables. • The project will engage licenced recyclers to collect recyclables like paper, glass, cans, plastic for recycling. • General waste will be disposed of in licenced waste disposal facilities	School staff School staff Environmental Specialist School staff	Environmental Specialist Environmental Specialist PSU Environmental Specialist
Maintenance of structures, movement of vehicles	*Dust and Noise* During maintenance of the equipment and structures, dust and noise may be	• Screens will be put in place around working areas to minimise dust and noise emission	Contractor(s)	Environmental Specialist

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
	generated from maintenance trucks and maintenance activities.	• Vehicles used during maintenance activities will observe very low speed limits to limit dust emission on gravel roads.	Contractor(s)	Environmental Specialist
Operation of ICT Infrastructure	Security Copper wires are subject to theft. Infrastructure that is installed to strengthen ICT learning may be subject to theft as well.	• All sites will have security personnel and systems to protect against theft.	MoET	PSU
Transportation of water	*Increased Emissions* The transportation of water by use of trucks and water tankers will lead to increased emissions of pollutants like Sulphur oxides, nitrogen oxides and greenhouse gases.	• It should be ensured that vehicles and equipment used in the project are properly serviced	Contractor	Environmental Specialist
Transportation of water	*Dust* Most of the project sites are located in areas that can be accessed through dirt roads. The movement of vehicles may lead to dust, especially in windy and dry conditions	• Drivers should be required to observe the speed limit	Contractor	Environmental Specialist
Installation of water tanks	*Accidents* *Open holes during the installation of water tanks may cause accidents to pupils, teachers and visitors in the schools.*	• All open holes should be barricaded with visible tape to warm people of the open excavation. • Any excavation will not be left uncovered for more than 48 hours	Contractor	Environmental specialist

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
Social Impacts and Risks				
Supply of water	*Water borne diseases* If the quality of water brought in for drinking and other uses is not checked, the learners and staff may be exposed to diseases.	• Regular monitoring of water quality at loading and delivery points. Water quality in the storage tanks should also be monitored. • Regular review of community health facilities for possible increase in waterborne diseases cases. • A plan to clean up and sterilize the water storage tanks should be put in place and implemented.	Environmental Specialist Environmental Specialist Environmental Specialist	PSU PSU PSU
Project implementation	*Sexual Exploitation and Abuse/Sexual Harassment and Gender based Violence* There may be the increased risk of sexual exploitation if contractor managers and supervisors seek to extract sexual gain from potential suppliers of goods, works, non-consulting services in the project. In the target communities, the poverty levels are above 30%. This makes the children at risk of being exploited by project workers like drivers, ICT technicians, contract personnel	• The procurement procedures and processes for the project should be well defined and implemented through the project cycle. • All types of project workers should have a strong code of ethics that is adopted for the project. • A robust GRM structure should be adopted. The GRM shall also be considerate to GBV/SEA/SH case handling	Social Specialist Social Specialist Social Specialist	PSU PSU PSU

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
	installing learning equipment and other professionals who are more affluent than the locals. In some of the rural areas, this risk is more pronounced as some pupils walk distances as long as 10km to and from school. Girls are more prone to SEA as they walk through deserted places. In addition, some have to walk long distances to access water and firewood, making them vulnerable to such risks.	• Workers should be regularly educated and trained on the procedures for reporting SH incidences without feeling stigmatized or victimized. • Reported SH cases and victims should be treated with dignity to encourage more reporting • NGOs should be engaged to assist in the awareness raising campaigns as well as monitoring and evaluation of SEA and SH cases • Staff will be educated on the SODV Act and its consequences	Social Specialist Social Specialist Contractor Social specialist	PSU PSU Social Specialist PSU
Transportation of water to schools, movement of vehicles delivery indoor and outdoor learning equipment	*Increased road accidents* The movement of trucks transporting drinking water to the target schools	• Contractors transporting water should adhere to stipulated speed limits • Transportation of water into schools should be done during off peak times. • Use of speed control devices (governors) on trucks, and remote monitoring of driver actions	Contractor Contractor Contractor	Environmental specialist Environmental specialist Environmental specialist

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
		• Learners will be taught on road safety	Teachers	Environmental specialist
Use of water from storage tanks	*Increased wastewater generation and erosion* The increased water supply will lead to increased generation of wastewater. This may lead to pollution of water resources if the wastewater is not managed properly. If wastewater flow design and management plan is not in place, wastewater may erode the sites.	• The project should ensure that the areas where water is supplied also has adequate wastewater management facilities. • Where there no wastewater management facilities, these should be put in place.	PSU PSU	MoET MoET
Installation of outdoor learning equipment	*Open trenches and holes* *Open holes and trenches for installation of outdoor learning equipment (Component 1) may pose hazards to learners and staff.*	• All holes and trenches should have a visible barricade around them to protect children from getting injured • Holes should only be dug when the equipment is ready to be installed and no open holes and trenches should be left open for more than 24 hours. • Children will be prohibited from playing where the installation of equipment is in progress.	Contractor Contractor Contractor	Environmental Specialist Environmental Specialist Environmental Specialist
Provision of teaching	*Marginalization of vulnerable groups*	• Vulnerable groups in each community will be identified and listed. These include: disabled,	PSU	MoET

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
equipment to teachers and learners	The project will result in the training of teachers as well of supply of gadgets as teaching equipment to these teachers. Due to cultural gender issues, this equipment may be unequally distributed according among male and female teachers. Students coming from child headed families and double orphans may also be deprioritised in the issuing of electronic learning equipment	double orphans, learners from child headed families and poor families. This will be done to ensure that there is a deliberate effort to ensure these learners benefit from the project. During the engagement of parents, child headed families should also be considered. • Education and awareness raising will be conducted for procurement workers and those who manage facilities on the importance of equal access to services and goods. • Discriminatory practices will be discouraged by putting in place incentives for good practices • All students and teachers will be given equal access to project equipment and benefits, regardless of gender, economic status, learning ability.	PSU Social Specialist Social specialist	MoET PSU PSU
Implementation of online learning	*Inaccessibility of services to schools without internet and telephone connection* In some of the rural schools in the Tinkhundla centres identified, there may be	• Before project commencement, the status of connectivity and reliability of internet connections should be assessed in eth schools that are targeted under component 2.	PSU	MoET

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
	risks of inaccessibility of internet connection which may cause these schools to be left behind in the project.	Activities to strengthen and/or connect these schools should be done for the project to be effective.		
Operation of improved Internet connections	*Distractions due to misuse of internet* The improvement of internet availability may be a distraction to pupils and teachers. This may then result to a negative impact to learning for pupils. Issues of cyber bullying may also be a significant factor that affects learning.	The introduction of ICT based learning will be supplemented with education and awareness on the responsible use of the internet.	PSU	MoET
	Inadequate consultation and inclusion Inadequate stakeholder identification and engagement may lead to conflicts amongst the stakeholders in the project, as well inequitable realization of benefits of the projects. This impact would be more pronounced for the vulnerable groups.	The SEP developed for the project should be adapted for each subproject to ensure site specific project identification, analysis and engagement. The SEP needs to be periodically updated to reflect the prevailing environment. Sub-Project designs should ensure that all groups of stakeholders and beneficiaries of the project have access to the benefits of the project, regardless of economic status, race, religion and disability.	PSU PSU	MOET MOET

Activities	Main Risks	Suggested Mitigation Measures	Responsible Authority/Entity	Monitoring Authority
		There should be periodic review of the distribution of benefits to different stakeholders, especially vulnerable groups.		
Maintenance of ICT equipment, installation and filling of water tanks	*Communicable diseases transmission* The presence of contract workers to do installation and maintenance of equipment may increase the risk of communicable diseases (e.g. HIV, COVID-19) transmission for students, school staff and the community.	• Regular education and awareness for students and school staff on transmission prevention measures. • Provision of adequate handwashing, sanitizing facilities for students and staff. • COVID Screening of contractor, students and staff. • Provision of information, education and communication (IEC) materials • Provision of condoms in toilets and other communal areas	PSU School staff School staff School staff School staff	MOET PSU PSU PSU PSU

6 ENVIRONMENTAL AND SOCIAL MANAGEMENT TOOLS AND PROCEDURES

6.1 Key Steps to be followed

6.1.1 Screening of subprojects

Subprojects identified will be screened using the screening tool presented as Annex B of this report. The annex outlines aspects such as potential impact of project to labour, natural resources, vulnerable groups and community/social impacts. Depending of the outcome of the screening exercise, the level of detail and type of environmental assessment that will be required under the World Bank Environmental and Social Framework (ESSs and EHS guidelines) with be identified. In compliance with national legislation, screening involves the collection of baseline information in order to determine the potential risks associated with project implementation. Field visits would be undertaken to understand and record the overview of the project site and the surrounding environment. A project brief is then prepared and submitted to EEA for categorization. The subprojects may be assigned one of 3 categories (1, 2 or 3).

The subprojects may be assigned category 1 if the EEA considers that the subprojects unlikely to have any significant adverse environmental impacts. An Environmental Management Plan is prepared for such projects for review and approval by the EEA. Category 2 projects subprojects would be those that the EEA may consider as likely to have some significant adverse environmental impacts but that the impacts are relatively well known, easy to predict and measures which can be taken to prevent or mitigate impacts are well known. For these projects, an Initial Environmental Evaluation (IEE) is prepared for review by the EEA. Subprojects that may be assigned as category 3 are those for which the EEA considers are likely to have significant adverse environmental impacts and that in-depth study is required to determine the scale, extent and significance of the impacts and to identify appropriate mitigation measures. An Environmental and Social Impact Assessment is prepared for category 3 projects.

In assigning a project category, the EEA considers factors like the scale and nature of the project as well as the proposed location in relation to environmentally sensitive areas.

6.1.2 Environmental and Social Impact Assessments (if required)

The first step for projects that require ESIAs is the scoping phase. This is a stage where an environmental and social scan of potential issues is evaluated though a consultative exercise. This is where the public and relevant stakeholders are informed about the project. The exercise helps to get public views on the project and also assist in the identification of project-

affected parties. The public consultations provide further information on the environmental, social issues and other concerns which may arise over and above those that environmental and social assessment professionals may predict. It is important that stakeholder engagements and public consultants are initiated in the early stages of the subprojects to allow for public knowledge to influence the design process. It is at this stage that it is determined which plans would need to accompany the ESIA (RAP, LRPs, and other studies). The scoping exercise culminates into the compilation of a scoping report with clear terms of reference for the environmental and social assessment and a defined study team which needs to be approved by the EEA.

After approval of the TORs, surveys are conducted, such as socio-economic surveys which are a continuation of consultations with the community through questionnaires, interviews, etc. Specialist studies—like ecological, water quality and social impact assessments—are also conducted as part of this process. The data collected through desktop research, screening, surveys and specialists' studies is then used to compile an ESIA report. The ESIA report identifies and evaluates positive and adverse impacts that the project is likely to have on the natural and social environment.

6.1.3 Environmental and Social Management Plans

Environment and Social Management Plans (ESMPs) will be prepared for subprojects. The ESMP provides mitigation and management measures for the proposed project. A site specific ESMP is developed to propose measures to enhance positive impacts and minimize or prevent adverse impacts. It involves the identification and development of measures aimed at avoiding, mitigating, offsetting and/or reducing impacts to levels that are environmentally and socially acceptable during implementation and operation of the project. ESMPs provide an essential link between the impacts predicted and mitigation measures specified within the ESIA, and implementation and operation activities. It must clearly describe adverse impacts and mitigation actions to be taken. The magnitude and temporal scale of the various subprojects will determine the contents/coverage of the ESMP. Depending on extent of issues that are to be avoided, minimized and/or mitigated, the ESMP will have concrete/specific mitigation actions, timelines and responsible persons. For each subproject activity, an ESMP should address the following:

- Mitigation, enhancement, protection and compensation measures for each phase including design pre-construction, construction, operation and maintenance;
- Mitigation performance monitoring (i.e., monitoring the operation and maintenance of mitigation measures and their targeted impacts);

- Project Affected People (PAP) participation arrangements by project development phase;
- Capacity development and training requirements, including institutional arrangements for implementation, monitoring and reporting;
- Cost estimates for all ESMP activities;
- Integration of the ESMP with the project's overall planning, designing, budget and implementation, and

The ESIA and ESMP reports will be submitted to the Eswatini Environment Authority (EEA), the MOET and the World Bank for review. Prior to this, draft reports will be reviewed by the MOET and the World Bank.

The local environmental screening process is depicted in Figure 2 below and it is outlined in the Environmental Management Act 2002, read with the Environmental Audit, Assessment and Review Regulations, 2000. The process is the responsibility of the Eswatini Environment Authority (EEA) referred in Figure as the relevant authority. EEA receives applications for project implementation and assigns the project a category. The relevant reports would then be prepared by MoET and submitted to the EEA for review. Revisions are, thereafter, made to the reports based on comments from the EEA. When the EEA has reviewed the reports for category 1 and 2 projects and found them to adequately identify and address all environmental and social risks of the project, an environmental approval for project implementation is issued. Category 3 projects are advertised by the EEA for public review and the public is required to send comments and concerns to the EEA. The EEA then send comments to the MoET to address comments and concerns received at the end of the public review period. If the responses from MoET on the public comments and concerns are satisfactory to the EEA and the IAPs, the EEA issues an approval for project implementation.

If there are 10 or more substantial objections, the project is subject to a public hearing by the EEA. The public hearing is conducted by a tribunal which is selected by the EEA. The tribunal then compiles a report at end of the public hearing with recommendations on whether the project should be approved for implementation and present it to EEA. The recommendations would then be communicated to the MoET by EEA. If the MoET is not satisfied with the tribunal decision, can lodge an appeal to the Minister of Tourism and Environmental Affairs. The decision of the Minister is final. If the MoET is not satisfied after the minister's decision, legal recourse may be pursued within the local judicial system.

The local environmental process is depicted in Figure 2 below.

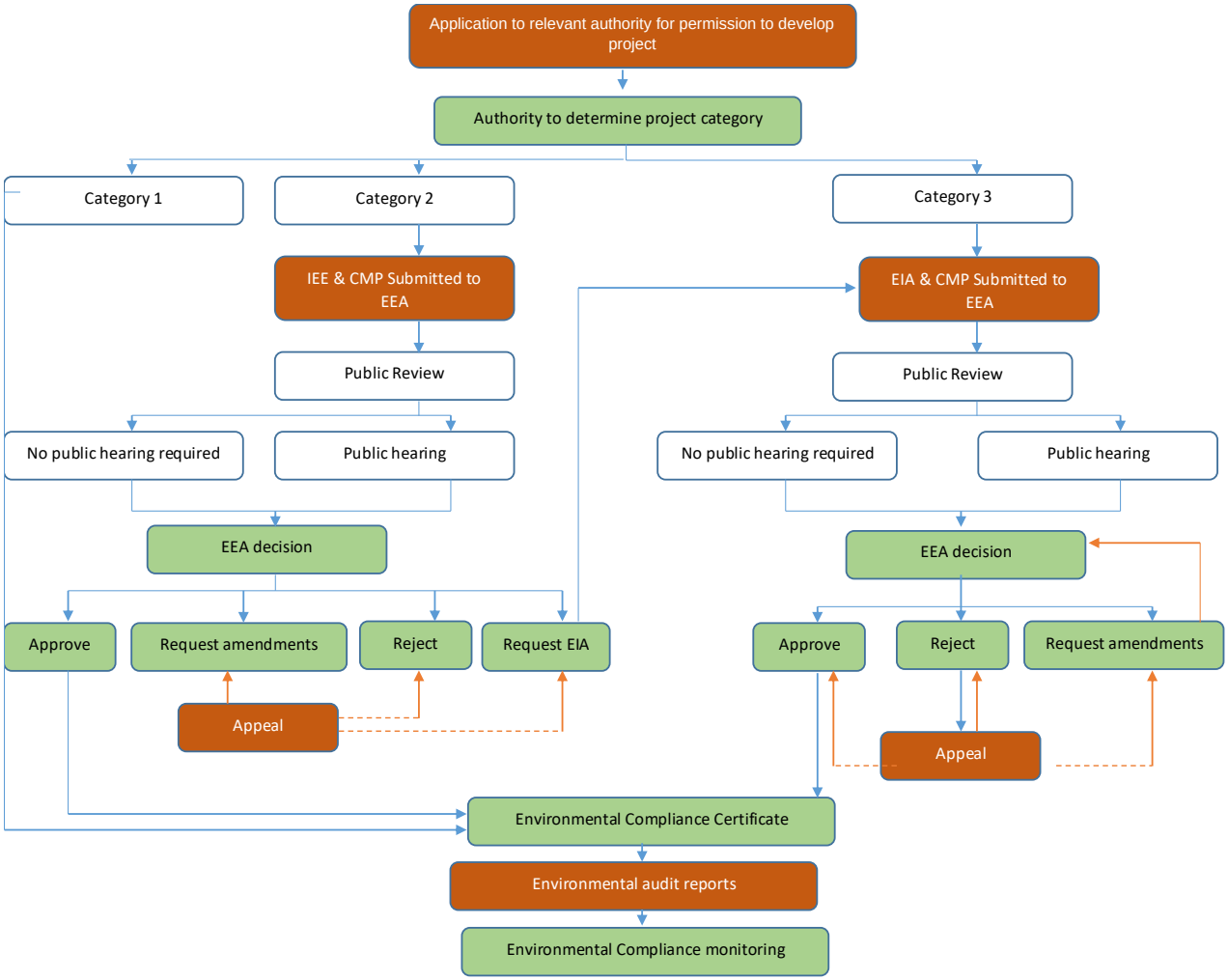


Figure 2: Illustration of Eswatini ESIA Process

6.2 Information Disclosure

Project affected parties, NGOs and other relevant stakeholders will be consulted in earlier stages of the process. As such, information disclosure involves review of the prepared ESIA/ESMP by the public to ensure that all public comments and environmental issues have been addressed. This ensures that concerns which were raised during stage 1 have been adequately addressed in the ESIA. When the EEA is satisfied that all public concerns about the project have been adequately addressed in the ESIA, an Environmental Compliance Certificate (ECC) is issued.

The disclosure of documents shall be as per local requirements and World Bank procedures.

6.3 Key Principles for Subproject Engineering Design

In order to avoid and minimize adverse environmental and social impacts at sub-project level, key findings from the environmental and social screening report should provide the basis for

developing sub-project engineering designs. In situations where results from the field assessments are not duly factored into the sub-project design, the ecological footprints that could result from such proposed engineering designs could be significant. To eliminate such complexities, project contractors will work hand in hand with the respective Environmental and Social experts to ensure that the proposed designs are environmentally, socially and economically viable. Until the ESIA/ESMPs are publicly disclosed and approved, engineering drawings will undergo a series of changes to incorporate all recommendations from the environmental and social standpoint.

6.4 Integration of ESMP into Bidding Documents

Contract documents will need to be incorporated with clauses directly linked to the implementation of environmental and social risks and impacts management measures. Mechanisms such as linking the payment schedules to implementation of the said clauses need to be explored and implemented, as appropriate.

6.5 Monitoring

The arrangements for monitoring the ESMF and site specific ESMPs will fall under the overall responsibility of the MoET. Periodic monitoring and annual evaluations will be conducted to determine whether the measures proposed in the ESMPs for the subproject components are being implemented effectively.

7 STAKEHOLDER CONSULTATIONS

7.1 Introduction

Stakeholder consultations form a very crucial part of all development projects and are usually carried out as a continuous process throughout the project cycle. Public and stakeholder consultations and workshops during the design and project planning stages provide the medium for sharing information about the project objectives and scope, alternative design options, and stakeholder perceptions regarding proposed investment plans. Ensuring an open and transparent information exchange about the project at this stage, lays a good foundation for an inclusive and participatory implementation process. In view of the scope of interventions along with provisions under the Bank's ESS1 requirements, the proposed project's inherent environmental and social risks and impact is rated Moderate. As such, a standalone and inclusive draft Stakeholder Engagement Plan (SEP) has been prepared.

7.2 Stakeholder Engagement Plan

Its main objective is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. It also outlines a communication strategy with the project stakeholders, and offers mechanisms for them to raise concerns, provide feedback, or make complaints about project. Stakeholder Engagement deals with all project components as it seeks to ensure stakeholders are consulted and well-informed about the project and have avenues to provide their feedback The SEP includes a Grievance Redress Mechanism (GRM) to ensure the inclusion and non-discrimination of vulnerable groups. The SEP forms part of the ESMF and will be applicable for all the project components. The SEP identifies all key existing and potential stakeholders, and describes, among others, their level of interest, influence and support to the project and in its planning and implementation. It describes means, timelines and frequency of communication with each stakeholder/stakeholder group, grievance mechanisms to be deployed, monitoring and reporting. The SEP shall be disclosed in-country and at the Bank prior to project Appraisal. To ensure that the consultations are useful to the PAP, MoET will ensure an environment where participants, irrespective of social status, would be able to express their opinions and preferences freely.

7.2.1 Project Stakeholders

Generally, projects have various stakeholders including project affected parties (PAPs), project interested parties (PIPs) and other parties. The vulnerable persons are also recognized as significant stakeholders requiring special attention.

7.2.2 Project Affected parties

Project Affected Parties (PAPs) include local communities, community members and other parties that may be subject to direct impacts from the Project. The MoET has identified the stakeholder in Table 11 below as PAPs. These include mainly government ministries, educational institutions and education practitioners. Some of PAPs for the project are listed below:

- Ministry of Education and Training
- Deputy Prime Minister's Office
- Ministry of Health
- Ministry of Youth, Sports, Arts and Culture
- Ministry of *Tinkhundla* Administration and Development
- Ministry of ICT
- Teacher Training Institutions
- Vocational Training Institutions
- Tertiary institutions
- Schools

7.2.3 Project Interested parties

Other individuals or groups, in addition to project affected parties and disadvantaged or vulnerable groups that may have an interest in the project will be identified as other interested parties. These include the following:

- Eswatini National Association of Teachers
- School committees
- Parents
- Student groups
- Eswatini Communication Commission
- Donor agencies
- Companies / businesses
- NGO
- Eswatini Revenue Authority
- MTN Eswatini
- Swaziland Council of Churches
- General Public
- Regional Administrators

- *Tinkhundla*
- Municipalities
- *Imiphakatsi*

7.2.4 Vulnerable persons

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups on infectious diseases and medical treatments in particular, be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their 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. The list below shows the stakeholders that are categorized as disadvantaged or vulnerable groups.

- People living with disabilities
- Children from child headed families
- Single mothers
- Double orphans
- Teenage mothers
- People living with HIV/AIDS

7.3 Preliminary Stakeholder Consultations

During project preparation, a number of stakeholder engagements were conducted with key project stakeholders. This was done through various World Bank missions that started in 2019. This resulted in a number of aide memoires that informed the development of the project concept note. Subsequent stakeholder consultations are described below.

7.4 Stakeholder Workshop

When thedevelopment of the ESMF was commissioned, and initial engagements were held with MoET MoH, DPMO, MTAD, MSYA to introduce the ESMF and SEP development process. These meetings were carried out on 10 and 11 December 2020. A stakeholder workshop was held on 16 December 2020 to solicit key stakeholder input on the ESMF development and further stakeholders that may have been missed in the initial stages of the project. Participants of the workshop were from the various departments of the MoET, MSYA, MICT, Emlalatini Development Centre and UNESCO.

7.5 Key Informant Interviews

KIIs were conducted within the month of January 2021 with various stakeholders representing 10 organizations covering components 1, 2 and 3 of the project (Table 3).

Table 9: Key Informants

Component	Organization	Person Interviewed	Date
Component 1	Shining Stars Preschool	Mr. C. Dlamini (School Principal)	14 January 2021
	Mahlabatsini BA Primary School	Ms. N. Dlamini Mrs. Bongekile Hlophe	14 January 2021
	Shewula Primary School	Mr S. Mngomezulu	14 January 2021
	NCPs	Mr. Ndlangamandla	
Component 2	Gija High School	Mr. Samson Nxumalo	15 January 2021
	Mandulo High School	Mr. Dludlu	19 January 2012
	Tikhuba High School	Mr Bongani Magongo	14 January 2021
	MICT	Sakhile Dlamini	11 January 2021
Component 3	VOCTIM	Tenele Dlamini Musa Nyawo	15 January 2021
	ENYC	Mr. Dlamini (CEO)	14 January 2021
		Mr. Hlatshwayo (Regional Coordinator- Shiselweni)	14 January 2021

7.6 Summary of Findings from Stakeholder Consultations

7.6.1 Classroom Environment

Some public schools do not have physical classes for grade 0, especially in the rural areas. Learning equipment is also lacking in most of the rural grade 0s and public preschools, and since primary education is free parents are often reluctant to pay for grade 0. Private preschools, on the other hand, have a different experience and a good classroom environment.

Reading material provided in rural school libraries was reported to be inadequate and not up-to-date. Field visits also revealed that Neighbourhood Care Points (NCPs) in rural areas are dilapidated and lack access to adequate water and sanitation facilities. Rural schools often lack staff rooms or have staff rooms that are not adequate for the staff compliment. Staff accommodation is also inadequate, leading to sharing amongst teachers and the potential for conflicts.

7.6.2 Public transport and Travel distance

Access for schools located in rural areas is a challenge due to the condition of the roads. This influences the availability of public transport. The poor road conditions and the unavailability of public transport then leads to a high turnover of teachers, which affects continuity with students. Teachers are also discouraged by needing to travel long distances to get amenities like shopping, ATMs or banks. Secondary schools are largely based in urban centres of the country and travel to school may be a burden for children, and their parents, who live in rural areas. Students in the remote rural areas often walk long distances to and from schools due to the lack of public transport or lack resources to afford public transport. As a result, these students often get tired quite early in the day and experience poor concentration levels. Assessing the adequacy of supply of secondary schools in Eswatini is a priority for the MoET.

7.6.3 School drop-out rates

Some schools in the remote rural areas have no role models and this affects their motivation for education. For example, in areas where there is illegal farming of dagga, role models are considered to be those succeeding from dagga farming and not people succeeding because of education. As a result, school boys with this viewpoint drop out quite early to pursue this ‘business’. They also tend to have relationships with students who then drop out of school due to pregnancy. These students also tend to get married quite young.

Some households were reported to be headed by children, which makes it difficult for pupils to balance school and family life. Some students leave school and relocate when they experience a loss/death of the provider in their families.

7.7 Grievance Mechanism

A Grievance Mechanism (GM) assists in the resolution of complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

Grievances are understood to be issues, concerns, problems or claims (perceived or actual) that an individual or group wants MoET, through the project, to address or resolve.

7.7.1 Objective of the GM

Grievances raised by stakeholders need to be managed through a transparent process, readily accessible and acceptable to all segments of affected stakeholders, at no cost and without retribution. The grievance mechanism should be appropriate to the scale of impacts and risks presented by a project, and beneficial for both the proponent/operator and external stakeholders. The mechanism must not impede access to other judicial or administrative remedies. The key objectives of the grievance mechanism are to:

- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions)
- Forward any unresolved cases to the relevant authority.

7.7.2 GM Principles

The GM will be based on the following principles:

- **Fairness.** Grievances are treated confidentially, assessed impartially and handled transparently.

- **Objectiveness and independence**. The GM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case. GM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- **Simplicity and accessibility**. Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them. Project beneficiaries have a range of contact options including, at a minimum, a telephone number (preferably toll-free), an e-mail address, and a postal address. The GM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income. The GM does not use complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices).
- **Responsiveness and efficiency.** The GM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances are trained to take effective action upon, and respond quickly to, grievances and suggestions.
- **Speed and proportionality.** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
- **Participatory and social inclusion**. A wide range of project-affected people, community members, members of vulnerable groups, project implementers, civil society, and the media are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor people and marginalized groups, including those with special needs, are able to access the GM.

7.7.3 Scope of GM

The GM will cover grievances raised in relation to the following;

- All concerns raised in relation to the implementation of any projects and programs coordinated by the PSU;
- All concerns raised in relation to occupational, community health and safety risks in project areas
- Adverse environmental and social impacts in relation to Project funded activities and programs.

7.7.4 Structure of the GM

1.1.1.6 GM at Sub-Project level

Grievances may be lodged directly to the school or project site with the principal's office or through a comments and suggestion box to be installed in each site. Grievances can also be logged in the regional education office directly. This will then be passed to the Social Specialist (or appointed officer, e.g., M&E officer). When a grievance is logged, the Social Specialist should acknowledge the complaint, unless the issue is logged anonymously. If the issue is registered anonymously, it will be automatically referred to the Project coordinator. Upon registration, the appointed Officer will refer the issue for resolution or mediation to relevant officials. The aim is to resolve all grievances within a few weeks. Any grievance which is not resolved within that timeframe will be reported in detail in monthly Project management reports. All other grievances will be aggregated to track trends for managerial response.

A Complaints Register will be maintained by the Social Specialist, who will log the: i) details and nature of the complaint; ii) the complainant's name and their contact details; iii) date; iv) corrective actions taken in response to the complaint. This information will be included in project progress reports. The subproject level process can only act within its appropriate level of authority and where appropriate, complaints will be referred on to the relevant authority.

At subproject level, the project will establish a GM team with the following membership:

- School Principal
- PAP
- Social Specialist
- Regional Education Officer (REO)- chairperson

The subproject level GM committee shall resolve or reach a decision five (5) days from the date the complaint is received. The chairperson of the GM committee shall communicate the committee's decision to the aggrieved PAP in writing and keep record of all the decisions related to each case. The following process will be followed by the Environmental and Social Standards Officer, who will be the driver of the GM at project level.

7.7.7.2 GM at Project/National level

Grievances will be handled by the Grievance Office at MoET national level through the ministry toll free number. The toll-free number will be connected to the PSU through the Environmental and Social Standards Officer.

A Grievance Committee (GC) will be set up at the PSU level. The GC will be composed of the four officers – Environmental and Social standards officer, Project coordinator, head of project and human capital liaison Officer.

The PSU GRM will follow the process outlined in the following table.

Table 10: PSU Grievance mechanism

Step	Process
1	The Aggrieved Party (AP) will take his/her grievance through the MoET toll free line 9664, or email to PS at ps_education@gov.sz. Office address: Ministry of Education and Training Building Hospital Hill Road, Postal Address: P. O. Box 39 Mbabane, Swaziland, Telephone: (+268) 24042491/ 24045750/ 24043307 Mbabane Kingdom of Eswatini. The complaint will then be passed to the Social Specialist (of the PSU) within 24 hours.
2	The Social Specialist logs the grievance and acknowledges receipt to the complainant within two working days including communicating the timeline within which resolution is expected, i.e., 14 days or 30 days in case additional investigation/research is needed. As a minimum the following information shall be recorded: • Case number • Complainant's name and contact details • Date and time of complaint • Description/statement of the grievance including where it happened, date and the Contractor staff complained against if applicable • Date complaint is referred to the PSU by toll free line, email or in person.
3	The Social Specialist then refers the same to the GM committee within 24 hours for resolution within 14 days, i.e., no more than 30 days from when the complaint was originally made to the hotline or by email.
4	If the Grievance committee determines that additional research / investigation is needed, it will inform the complainant that additional time is required, not more than 6 weeks from when the complaint was first made.
5	In exceptional circumstances, if more than 6 weeks is required, this will be recorded in detail for review by the project Coordinator and the World bank team and will be reflected in the PSU's bi-annual reports and M&E reporting.

Step	Process
6	The complainant will be informed of the outcome immediately and at the latest within 5 days of the decision.
7	If the complainant is not satisfied, or the matter is not resolved, the complainant will be notified of his/her right to appeal the decision of the PSU through to the PS. The PS will consider the grievance and make a decision within 14 days.
8	If the issue remains unresolved through the PS decision, the complainant will be advised of his/her right to seek legal recourse through the courts. Any such decisions are final.

The PSU GM and the GC are required to follow the steps for resolution of grievances as set out below.

- The GC shall convene as per necessity (but at least once a month) and shall include at a minimum 4 members. Special provisions will be made for any complaints of a confidential nature and in the case of complaints related to sexual exploitation and abuse (SEA) and sexual harassment (SH), procedures as laid out in the SEA/SH action plan to be prepared will be followed.
- Investigation/follow-up can include site visits, document review, and meetings with parties who can solve the problem. The results of the investigation and response will be submitted for consideration to the Project Coordinator, who will decide what action to take.

7.7.8 Grievance Resolution Approach

Grievances should be resolved as per timelines set out above. The following steps shall be followed in a timely manner to avoid delaying resolution of a grievance:

- Obtain and document as much information as possible from the person who received the complaint, as well as from the complainant to gain a first-hand understanding of the grievance (For handling grievances relating to SEA and SH, please refer to SEA/SH action plan to be prepared).
- Undertake a site visit, if required, to clarify the parties and issues involved. Gather the views of other stakeholders.
- Determine whether the grievance is legitimate/sound. Inform the complainant of the expected time frame for resolution of the grievance.
- Enter the findings of the investigation in the grievance database.

The results of the investigation of non-sensitive complaints should be publicized.

7.7.9 Closure of Grievance

A grievance will be considered “resolved” or “closed” when a resolution satisfactory to both parties has been reached, and after corrective measures have been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is under implementation or has been implemented to the satisfaction of the complainant, a complaint close-out form will be signed by both parties (PSU Coordinator or its representative and the complainant), stating that the complainant considers that his/her grievance is closed. The grievance then, will be archived in the Project Grievance database. In certain situations, however, the Project may” close” a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. In such situations, the Project’s efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. MoET will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

7.7.10 World Bank Grievance Redress Mechanism

If the project GM failed to resolve disputes in amicable fashion, PAPs and individuals who believe that they are adversely affected by a project supported by the World Bank may also send complaints directly to the Bank through the Bank’s Grievance Redress Service (GRS). A complaint can be submitted to the Bank GRS through the following channels:

- Email: grievances@worldbank.org
- Fax: +1.202.614.7313
- Mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street,
- Northwest, Washington, DC 20433, USA.

7.7.11 Sexual exploitation and abuse and Sexual Harassment

Other measures to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH), will be identified in the SEA/SH Action Plan which will be project specific and will be developed by the contractor during project implementation. With respect to SEA/SH related complaints, special procedures will be adopted in order to ensure anonymity and referral procedures to associated NGOs who are

experienced in handling GBV cases will be set up. If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level, the head of the GM, will then refer the matter to the MoET for a resolution. Project Affected Parties (PAPs) have the option to take their respective case/s directly to the established legal system as provided by Eswatini law.

7.7.12 Awareness raising and disclosure of the GM

Awareness raising and disclosure of the GM will be provided in an accessible format. Communities and potentially affected persons will be advised of the GM in the early stages of engagement on the project, and be made aware of:

• The potential impacts of the project and how these impacts are to be minimized;

• How they can access the GM (i.e., key people and complaint forms);

• Who to speak to and how to make a complaint;

• The timeframes for each stage of the process;

• The GM being confidential, responsive and transparent; and

• Alternative avenues of dispute resolution where conflicts of interest exist.

7.7.13 Grievance Records and Documentation

A PSU grievance log will be maintained by the Social Specialist. The PSU Grievance log at a minimum will record the following information:

- Individual case number
- Complainant's name and contact details (unless the complaint has been submitted anonymously)
- Date and time of complaint
- Date complaint was sent by Hotline to PSU (standard is within 2 working days of complaint being received by Hotline)
- Date complaint was logged by PSU
- Date acknowledgement was sent to complainant by PSU
- Time estimated to address (3 weeks or 6 weeks)
- Description/statement of the grievance including where it happened, date and the Contractor staff complained against if applicable
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution OR Details of it being sent to the PS for resolution
- Details of whether the complainant was satisfied with the resolution, whether the complaint can be closed out

- Date of when the complaint is closed
- Date when the resolution is implemented (if any).

8 INSTITUTIONAL ARRANGEMENTS FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

8.1 Project Implementation Arrangements

The Ministry of Education and Training (MoET) is the primary implementing agency and will be responsible for the overall coordination and implementation of the project. The Project will be implemented using existing structures and systems at all relevant levels of the education system. The Principal Secretary (PS) of the MoET will act as the Head of the project, providing strategic vision and overall leadership in the coordination and management of the project. The Director of Education at the MoET, accountable to the PS MoET, would be responsible for the day-to-day coordination for the implementation of the project's sub-components. Project implementation is the responsibility of the MoET with support of a Project Support Unit (PSU), housed in the MoET and accountable to the PS of the MoET through the Director of Education of the MoET.

The PSU will be responsible for supporting the fiduciary, environmental and social safeguards and monitoring and evaluations aspects of the project by ensuring adherence to the financing agreement (FA) and the Project Operational Manual (POM) as it concerns financial management, procurement, monitoring and evaluation, social and environmental safeguards, reporting, as well as the effective and timely implementation of the grievance redress mechanism. The PSU will include a PSU manager/project coordinator; financial management specialist; accountant; procurement specialist; environmental and social safeguard specialist; a monitoring and evaluation specialist and an administrative assistant. The financial management specialist will report to the PSU manager and the Financial Comptroller of the MoET, the M&E specialist will report to the PSU manager and the Head of the EMIS at the MoET, and all other specialists will report to the PSU manager who in turn, reports to the Director of Education.

The implementation arrangements of the various components and sub-components of the project will be as follows:

Component 1: Strengthening coordination and regulation of ECCDE and improving access to quality ECCDE services. In the MoET, the Chief Inspector for Primary Education, who also covers ECCDE, will be responsible for the overall coordination of this component and will be supported by the Deputy Prime Minister's Office (DPMO) National Children's Coordination unit. A technical working group comprised of representatives from all different implementing entities are headed by the Chief Inspector Primary will be established to support the

implementation of this sub-component. The MoET will also coordinate with other Ministries and agencies to implement some of the activities under this component.

Component 2: Improving quality and internal efficiency in basic education. The MoET will be responsible for leading and coordinating this component since all the interventions are targeted at primary and secondary schools. Other entities that will be involved in the implementation of this component are: the Deputy Prime Minister's Office for the implementation of the OVC grant; the Ministry of Health (life-skills and reproductive health education programs in school for youth); the Ministry of Tinkhundla and existing NGOs supporting Adolescent Youth Clubs inside schools and communities; the Ministry of ICT and the Ministry of National Resources and Energy (water, electricity and internet connection for secondary schools, access to bulk purchases of laptops and other ICT goods).

Reporting at a level above the MoET, will be through a Project Steering Committee (PSC), chaired by the PS of the MoET, and will be established as an inter-ministerial and inter-agency body aimed at guiding the implementation of the project and promoting coordination and articulation at the highest decision-making level between all components and sub-components and all the key implementing stakeholders to ensure that all the functional elements of the project are well synchronized. The PSC will be composed of representatives from various agencies including the DPMO, MoH, Ministry of Tinkhundla, NERCHA and others. The PSC will meet semi-annually to review progress under each component and provide technical guidance and support to all committees.

To further support the coordination and monitoring of the project, the project will use the Local Education Group (LEG), which is an ongoing collaborative forum of stakeholders within the education sector led by the national government and comprises relevant ministries, development partners, civil society organizations and teacher's formations. Quarterly LEG meetings chaired by the PS of the MoET will be used to regularly take stock of the project progress.

8.2 Structure of the PSU

8.2.1 Central Institutional Implementation Arrangements

The key implementing players at the central level are:

Head of the Project. The Principal Secretary (PS) of the MoET, will be acting, on behalf of the Minister of MoET, as the Head of the Project, providing the Project's required overall leadership and will be accountable for the project performance. In this capacity, the PS MoET will ensure that the implementation of the Project is carried out in strict alignment with the

Project's Financial Agreement (FA) and Project's Operational Manual (POM) and will, to the best of his/her abilities, warrant that the Project's Developmental Objectives (PDOs), intermediate and final targets, as fully described in the Project's Results Framework (RF) and Monitoring Matrix, are achieved. The PS MoET will be accountable to the Minister MoET on matters related to the Project's implementation process.

Director of Education. The Director of Education, accountable to the PS of the MoET, would be responsible the overall coordinating effort required for the implementation of the Project's sub-components. The Director will carry out this coordination effort under the strategic and political guidance provided by the PS, and in line with the implementation lead given by the heads of the different units within the MoET entrusted with the responsibility of executing the various interventions. The Director will be supported by the project manager under the PSY in the day-to-day management and coordination of the project. Accordingly, the Director of Education will provide overall coordination of Project activities, comprising:

- Communication with MoET's implementation entities and directorates including horizontal and vertical articulation with the institutional and regional levels; and
- Supporting the various MoET's implementation entities.
- Organizing monthly internal performance review meeting

The Director would delegate the day-to-day management of the Project to the following entities:

a) The Chief Inspector Primary Education/ECCD for sub-components 1.1 and 1.2;

b) The Chief Inspector Primary Education for sub-component 2.1; and

c) The Chief Inspector Secondary Education for sub-component 2.2 and 2.3.

Project Steering Committee (PSC): The PSC has been conceived as an inter-ministerial and inter-agency body aimed at guiding the implementation of the Project and promoting coordination and articulation at the highest decision-making level between all components and sub-components and all the key implementing stakeholders to ensure that all the functional elements of the Project are well synchronized. The PSC will, inter-alia: (a) provide overall policy guidance to the Project implementation process; (b) approve the Project's Annual Work and Procurement Plans and proposed budget; (c) review and endorse the annual project progress reports including the external audit; and (d) discuss and resolve critical implementation issues which may arise and that may affect the Project implementation process and/or hinder achievement of the PDOs and intermediate and finale targets. The PSC

will carry out bi-annual program reviews or with any other frequency as needed and assess performance, potential challenges that could be anticipated early and craft preventive and/or corrective strategies where and when necessary, to incorporate lessons learned on the ground. The PSC will be chaired by the PS of the MoET and will be comprised of various agencies including the DPMO, MoH, Ministry of Tinkhundla, NERCHA and others. The Director of Education in the MoET, supported by the PSU manager, will act as the secretary of the PSC.

Local Education Group (LEG): To further support the coordination and monitoring of the project, the project will use the LEG, which is an ongoing collaborative forum of stakeholders within the education sector led by the national government and comprises government ministries, development partners, civil society organizations and teacher's formations.

Quarterly LEG meetings chaired by the PS MoET will be used to regularly take stock of the project progress.

Technical working groups: Three technical working groups will be established to support the day-to-day implementation of the project sub-components and provide the appropriate collaborative forum to address and solve specific implementation issues.

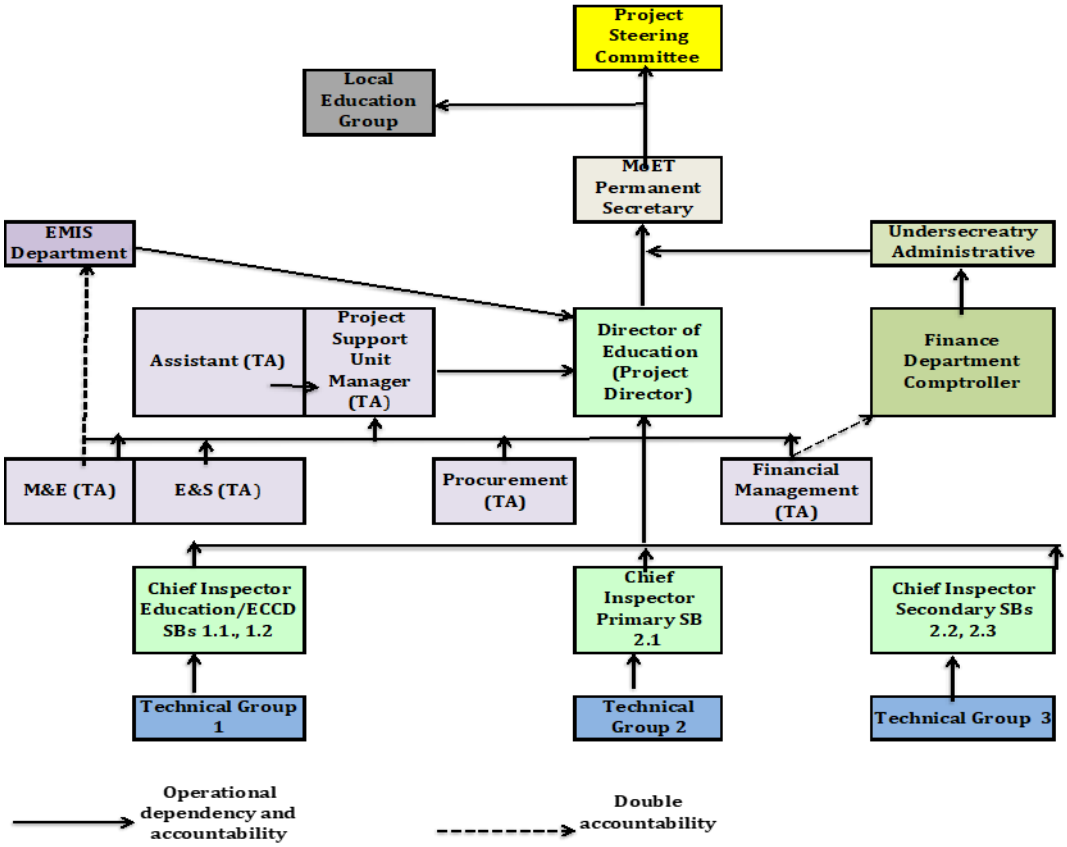


Figure 3: PSU Structure

The following Government entities will be entrusted with the implementation of the various components and sub-components of the Project as follows:

Component 1: Strengthening coordination and regulation of ECCDE and improving access to quality ECCDE services.

The Chief Inspector Primary Education/ECCD in the MoET will be responsible for the overall coordination of this component including its two sub-components. In implementing this component, the MoET will be supported by the National Children's Coordination unit in the Deputy Prime Minister's Office (DPMO). Other Ministries and agencies that will support the MoET to implement activities under this component are: Ministry of Health (MoH), Ministry of Tinkundla, National Emergency Response Council on HIV/AIDS (NERCHA), and World Food

Program (WFP). Other entities involved in supporting child services more indirectly include the Ministry of Natural Resources and Energy (water supply in rural schools and electricity connections to schools), the Eswatini Water Services Corporation (water and sanitation services in urban and peri-urban schools), the Ministry of Justice (child protection services) and the Ministry of Home Affairs (Child registration and identification).

This component will have one technical working group led by the Chief Inspector for Primary Education in the MoET and will include members from all relevant implementing entities. This technical working group is chaired by the Chief Inspector for Primary Education who is also responsible for ECCDE.

Component 2: Improving internal efficiency and quality in Basic Education

The MoET through its various inspectorates will be responsible for leading and coordinating this component since all the interventions are targeted at primary and secondary schools. Accordingly, the Chief Inspector for Primary Education will be responsible for the implementation of sub-component 2.1 while the Chief Inspector for Secondary Education will be responsible for sub-components 2.2 and 2.3.

Other entities that will be involved in the implementation of this component are: the Deputy Prime Minister's Office for the strengthening the OVC grant; the MoH (life-skills programs in schools, mental health services for children/youth, substance abuse services for youth); the Ministry of Tinkhundla and existing NGOs supporting Adolescent Youth Clubs inside schools and communities; the Ministry of ICT and the Ministry of Natural Resources and Energy (water, electricity and internet connections for secondary schools, access to bulk purchase of laptops and other ICT goods).

There are three sub-components under this component that will be supported by two technical working groups. The first technical working group corresponding to sub-component 2.1 will focus on early grade literacy and numeracy, and it will include representatives from the Primary Education Inspectorate Department, National Curriculum Council (NCC) and In-service education and training (INSET) and will be chaired by the Chief Inspector for Primary Education, who will also chair the technical working group for sub-component 2.1. This approach is expected to facilitate continuity in the project's intervention on foundational skills both at the ECCDE and primary level.

The second technical working group corresponding to sub-components 2.2 and 2.3 will support interventions at the junior secondary level. The working group will include representatives from the Secondary Education Inspectorate Department, INSET, NCC,

UNESWA in-service department, Education Testing Guidance and Psychological Services, Social Welfare – OVC unit within DPMO, ICT inspectorate, and Implementing Partners (NGOs) and will be chaired by the Chief Inspector for Secondary Education.

The National Curriculum Center (NCC) will participate in: (i) the finalization and implementation of the Grade 0 curriculum and the development and implementation of Grade 00 (for 4-5 year old) and 000 (for 3-4 year-old children) curriculum under sub-component 1.3; (ii) the development of training manuals/modules for teachers in English, Siswati and Mathematics in the early grades (1 to 3) and other related interventions under sub-component 2.1; and (iii) the review of secondary education mathematics and science curriculum content with the intention of integrating ICT use in the teaching and learning process.

The PSU, housed in the MoET will be responsible for the following day-to-day functions:

- Managing the project by ensuring fiduciary compliance in strict adherence to the FA and the POM as it concerns financial management, procurement, monitoring and social and environmental safeguards as well as the effective and timely carrying out of the grievance redress mechanism;
- Ensuring the carrying out of the required reporting as stipulated in the FA and the POM and periodic updating of the Results Framework;
- Ensuring the carrying out supervision and monitoring of project activities as stipulated in the FA and the POM;
- Ensuring the timely contracting of the TA to carry out the required surveys, impact evaluations and other related studies;
- Ensuring the preparation of the PAWPP; and
- Updating of the POM as needed in consultation with the World Bank

The PSU will be composed of five full-time MoET staff would be seconded to the Project: (i) one Financial Officer; (ii) one Procurement Officer; (iii) one Monitoring and Evaluation (M&E) Officer; (iv) one Environmental and Social (E&S) Safeguard Officer; and (v) one Administrative Assistant. These seconded staff would be supported by consultants working full-time on the Project for the entire duration of the Project in the following roles: (i) one Project Manager; (ii) one Financial Management Specialist; (iii) one Procurement Specialist; (iv) one M&E Specialist; and (v) one E&S Specialist. The detailed roles, responsibilities and attribution of this PSU staff will be described in more detail in the POM.

To ensure institutional ownership in the management of this project, it has been agreed that: (i) the financing officer at the PSU will also be accountable to the Financial Controller of the

MoET, who will be the highest Ministerial authority managing the project's designated account; and (ii) the monitoring and evaluation officer at the PSU will also be accountable to the Head of EMIS in the MoET.

8.2.2 Regional Institutional Implementation Arrangements

The four Regional Education Offices (REO) of the MoET in Hhohho, Manzini, Shiselweni and Lubombo will provide, through their cadre of school inspectors, the required vertical articulation (link), oversight and reporting between the central/national authorities, regional/district authorities, and the participating primary, junior secondary and ECCDE centers and services.

8.2.3 Local/Institutional (School) Level Implementation Arrangements

At the local level:

- The selected ECCDE centers and services will participate in the implementation of sub-components 1.1, and 1.2.
- The selected primary schools will participate in the implementation of sub-component 2.1; and
- The selected junior secondary schools will participate in the implementation of sub-component 2.2 and 2.3.

8.3 Environmental and Social Implementation Arrangements for the Project

The management, coordination and implementation of the ESMF and associated Environmental Management Plans will be the responsibility of dedicated team members within MoET Project Support Unit (PSU), The roles and responsibilities of the organizations are presented below:

The Environment and Social Specialist (ESS): The Environmental specialist will be responsible for ensuring that the provisions of the ESMF and that any necessary environmental licenses are complied with during the project implementation.

- Undertake monthly internal audits to monitor the implementation of mitigation measures in accordance with the ESMPs, and report on and respond to any environmental issues.
- Monitor the performance of contractors and subcontractors against the ESMPs.
- Report compliance and non-compliance issues to the contractor, PSU, competent authority and WB.

- Recommend corrective action when required for aspects of non-compliance within the ESMPs.
- Training of project staff, implementing partners, and contractors (list of persons, dates and places)
- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESMF.
- Be responsible for social risk management
- Oversee all stakeholder engagement related activities for the Project and Manage the GRM
- Liaise with the project manager to ensure that stakeholder engagement requirements/protocols are understood.
- Proactively identify stakeholders, project risks and opportunities and inform the PM/ PSU to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

Both the ESO will also prepare 1) quarterly reports summarizing monthly monitoring results, to be included in the Project's Quarterly Reports to the World Bank, and 2) reports that aggregate and analyse monitoring results ahead of regular World Bank implementation support missions with MoET.

8.4 Monitoring Arrangements for Effective Environmental and Social Management

8.4.1 Regular Reporting

Regular monitoring reports on the implementation of ESMF will be prepared and submitted at least twice a year. Reports and all instruments prepared for subprojects will be presented to the World Bank for review. These reports will be prepared by the Environmental and Social Standards Officer. These reports will be reviewed by the Environment and Social Safeguards Specialist for the World Bank. In addition, reports relating to the compliance of the project and its subprojects with environmental and social safeguards will be prepared and submitted to the Bank.

8.4.2 Incidents and Accidents

The Environmental and Social Standards Officer will promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or project workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, the Social Specialist will prepare a report on the incident or accident and propose any measures to prevent its recurrence.

8.4.3 Contractors' Monthly Reports

Monthly Environmental and Social Safeguards compliance reports will be submitted to the Bank during project implementation.

The EEA will be the key institution that will be reviewing and providing guidance for ESMPs for subprojects to ensure the project is implemented in compliance with the local environmental requirements. No subproject will be implemented without approval from the EEA. In addition, the EEA is responsible for enforcement of environmental compliance of the projects during their implementation. This is done through regular site monitoring and review of project compliance reports. The MoET/PSU will procure the services of a competent consultant to prepare these ESMPs once their locations and detailed designs are finalized.

8.4.4 Auditing

A Third-Party Audit will review the effectiveness of the implementation of environmental and social management plans. Primarily, the auditing exercise will determine whether the project/subprojects comply with all environmental and social regulatory performance standards.

Auditing process will test the accuracy of reports from field assessments and cost effectiveness of management measures. It entails a systematic, documented and periodic review of project implementation and may be a very useful tool to improve project management performance.

Instituted environmental audits at the construction/rehabilitation level and at the overall operation level is critical for an operation of this dimension. In this regard, the operation will incorporate a series of independent verification and audit mechanisms both at design and implementation phases. At the preparation phase, the project will launch a onetime independent technical audit of the ESMF and the ESIA/ESMPs. During the project

implementation, MoET will contract a qualified firm to conduct performance audit that will include financial management, procurement and applicable ESSs compliance requirements. As Integrated Environmental and Social Performance Auditor, the firm will review all project documents and visit a representative sample of the project for validation of environmental and social compliance. These will complement system enhancements that are aimed at monitoring efficiency and quality of expenditure. With respect to environmental and social issues, the performance audits will:

- Collect, analyse and interpret monitoring results to detect changes related to implementation and operation of specific activities;
- Verify if monitoring parameters are in compliance with national set standards;
- Compare the predicted impacts with actual impacts and evaluate the accuracy of predictions in view of proposed mitigation measures;
- Evaluate the effectiveness of implementation of the ESMPs for subprojects;
- Loop back into the ESMP any short comings identified from the auditing; and
- Identify and report if there is non-compliance with the ESMP and where applicable, identify replicable lessons from the monitoring.

8.5 Measures to Introduce/ Strengthen Institutional Capacity

There is need to build or strengthen capacity for the institution/s that are part of the project to ensure an effective management of environmental and social risks. This will be addressed through:

- Capacity Building and Mainstreaming Environmental and Social Dimensions in the Technical Standards and procedures; enhanced technical assistance (TA) and training, including sharing of environmental and social lessons from the previous project in the country.
- Integration of Occupational and Community Health and Safety requirements in the Standard Bidding Document. To ensure improved environmental and social management during the project implementation, a section clearly specifying preventive and mitigation measures to be taken by the contractors will be introduced into the Standard Bidding Document (SBD). Compliance with these specifications will be supervised as part of project technical supervision.

8.6 Training Programme

Table 11: Training programme

Training Course	Participants	Training Frequency	Timing of Training	Content	Responsibilities
Environmental and Social	PSU	Once off	Design stage	Content of ESMF, ESMF requirements (responsibilities and actions to be taken), ESMF checklist documents; ▪ Content of the ESMPs/ ESMP Checklists; ▪ Need for ESMPs, ▪ National and World Bank requirements for the content and quality of ESMPs; GBV/SEA-SH, Labour and working condition (LMP) ▪ Stakeholder engagement and awareness to Environment protection; ESCP, ESF Occupational health and safety; Waste minimization and management.	ES and SS
Environmental and Social Reporting and monitoring	ES, SS and ECO	Once off	Design phase	WB Reporting Requirements for Environmental and Social Monitoring, Incident reporting procedures	WB Environmental and Social safeguards Specialist
	Contractor(s)	Quarterly	Implementation phase	▪ Occupational health and safety ▪ Waste minimization and management LMP Contents and especially for workers, information on the contents of the CoC and disciplinary measures. Community Health and safety (SEA/SH, HIV, traffic safety, Procedures (Chance find procedures, GRM)	ES and SS

Training Course	Participants	Training Frequency	Timing of Training	Content	Responsibilities
Community health safety	Community	Twice a year	Implementation phase	Road safety, SEA/SH, HIV prevention Disease management (Communicable and Vector) Child rights	SS
	Teachers and students	Twice a year	Implementation	Road safety, SEA/SH/SA, HIV prevention Disease management (Communicable and Vector) Family planning, early pregnancies, and transactional sex	SS
			Implementation	Responsible use of internet Managing conflicts, water and energy conservation	SS
	Regional education officers			Content of ESMF, ESMF requirements (responsibilities and actions to be taken), ESMF checklist documents; ▪ Content of the ESMPs/ ESMP Checklists; Stakeholder engagement and awareness to Environment protection; Occupational health and safety; Waste minimization and management.	PSU (ES and SS)

8.7 ESMP Implementation Cost/Budget

In view of the environmental management measures suggested above, and factoring in the limited implementation capacity of the MoET, necessary budgetary provisions should be made for the project.

The following table presents a budget estimate for the ESMF Implementation.

Table 12: Estimated ESMF Implementation Budget/Cost

No	Activity//item	Unit	Unit cost	Number	Estimated cost (US$)
1	Training and capacity building for the project Implementation unit	Per training	2500	10	25,000
2	Environmental and social Monitoring and evaluation	Per month	2200	60	132,000
3	Continuous Stakeholder engagements during project life cycle	Per month	2200	60	132,000
4	Preparation and Implementation of ESMPs	Per subproject	10,000	140	1,400,000
5	Audits	biannual	10,000	10	100,000
6	Contingency				89,000
	TOTAL				**1,878,450**

These figures should be integrated into the total project cost tables.

8.8 Integration of ESMP with Project

Each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

9 CONCLUSION

This Environmental and Social Management Framework (ESMF) has been prepared to guide project planners, implementers and other stakeholders to identify and mitigate environmental and social impacts for the Strengthening of education and skills training for Human Capital Development Project in Eswatini. The ESMF was prepared taking into account the World Bank Environmental and Social Framework and relevant national requirements. The essence of the ESMF is aimed at ensuring informed decision making and environmental and social accountability and to assist in achieving environmentally and socially sound and sustainable development. It must be noted that due to the fact that the ESMF provides a broad framework for environmental management for the project, it is important that all subprojects are subjected to the relevant screening and approval processes for the Bank as well as national legislation.

10 ANNEXES

ANNEX A: MAP OF PROPOSED LOCATIONS

Since the target locations for the various project components are located throughout the country, the map of Eswatini showing all four administrative regions (Hhohho, Manzini, Lubombo and Shiselweni) is presented below. Component 1 (strengthening the quality-of-service delivery for ECDE service providers) has a total of 25 possible sites. Component 2 (early grade reading, numeracy, and assessment) has targeted all 620 public primary schools, and a total of 100 schools for improving retention in junior secondary education. Lastly, 9 TVET/ Skills centres have been identified for strengthen technical and vocational training for youth in selected economic sectors.

Map of Eswatini and administrative regions

ANNEX B: SCREENING TOOLS AND CHECKLISTS

INTRODUCTION

Screening shall be used to identify key environmental and social impacts that may arise due to project implementation, and to determine the type of environmental analysis to be conducted for the sub-project. The results of the screening process may either require a full ESIA, a limited environmental assessment or no further analysis.

SCREENING TOOLS AND CHECKLISTS FOR SITTING OF CONSTRUCTION

Question	Answer			Triggered ESS to be applied	Action
	Yes	No	Remarks		
Does the sub-project involve improvement of service provision? Does the sub-project little or no negative impacts? Briefly explain project details.				ESS1 Environmental assessment of Category 1	No review required
Does the sub-project involve construction of new facilities? Briefly explain project activities.				ESS1	Assessment of Impacts & mitigation measures
Does the sub-project involve any demolition? Will the project result in minor and known environmental or social impacts? Can the impacts be understood and managed without extensive analysis? Provide brief description of project details.				ESS1 Environmental assessment of Category 2	Environmental and Social Management Plan
Is the project site located in an area with dense vegetation, habitat sites, near a surface water body, or any environment that may be deemed to be sensitive? Will the sub-project cause significant environmental impacts to the physical environment? Provide brief description of project location.				ESS1 Environmental assessment of Category 1	Environmental and Social Impact Assessment
Are the impacts of the sub-project beyond the project area? Are the impacts indirect and cumulative? Are these major negative environmental impacts irreversible? Provide a brief description.				ESS1 Environmental assessment of Category 1	Environmental & Social impact assessment

Question	Answer			Triggered ESS to be applied	Action
	Yes	No	Remarks		
Will the sub-project result in significant negative social impact? Are the potential social impacts sensitive, diverse, and of great public interest? Provide brief description.				ESS10	Stakeholder Engagement Plan
Will the project make the quality of surrounding surface water worse? Provide brief description.					Exclude from project scope.
Will the project disproportionately affect vulnerable groups while making them benefit the least				ESS4	Social impact assessment
Will the labour for project and its contractors be mostly local				ESS2	Labour management procedure
Is the receiving community economic status making them vulnerable to exploitation				ESS4	Social impact Assessment

SCREENING TOOL AND CHECKLIST FOR WASTE MANAGEMENT

Utilize along with the Waste Management Act of 2000 and World Bank Environment, Health and Safety Guidelines.

Question	Answer			Action
	Yes	No	Remarks	
Are different waste streams expected from sub-project implementation?				Review of waste sources during planning, siting, and design activities, and process alterations, to identify expected waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure.
Are some waste streams recyclable				Evaluate of waste production processes and identification of potentially recyclable materials Provide separate waste receptacles for recyclable waste Identify waste recyclers
Will hazardous waste be generated by the operation of the facilities, i.e., lab chemicals, e-waste.				Segregate hazardous waste from non-hazardous waste. Disposal of hazardous waste shall be done by licensed contractor.
Are there any recyclable waste streams				Separate waste storage from other hazardous waste streams. Identify relevant recyclers to collect and recycle.
Are there any hazardous waste streams that will need disposal;				Identify approved disposal facilities outside the country. Engage EEA for Basel Convention process for effecting disposal.

ANNEX C: FORMAT FOR SITE SPECIFIC ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS

The following Environmental and Social Management Plan (ESMP) format shall be used to outline institutional arrangements, mitigation and monitoring measures to be taken during implementation and operation in order to eliminate adverse impacts or reduce them as practically possible:

INTRODUCTION

Describe the process that forms the basis for the preparation of the ESMP. Include sub-sections that that discuss the purpose, scope and objectives of the ESMP.

PROJECT DESCRIPTION

Provide a brief description of the sub-project, including project activities, main purpose of the sub-project, location, and duration of project implementation. The description of the location should include both the social and natural environment of the sub-project.

POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

Outline applicable national and international legislation and agreements relevant to the sub-project. Define applicable World Bank environmental and social targets for the project.

IMPLEMENTATION ARRANGEMENTS

Highlight the roles and responsibilities for the implementation of the ESMP, stakeholder engagement process, securing permits, grievance mechanism and monitoring and reporting requirements.

ENVIRONMENTAL AND SOCIAL MITIGATION PLAN

Outline and describe all anticipated environmental and social impacts. Provide and describe mitigation measures for each anticipated environmental or social impact. Determine implementation plans, time interval and responsibilities to be applied in the management of the impacts arising from the project. Consider other relevant mitigation plans relevant for the project. The environmental and social mitigation plan may be summarized in the following table:

Environmental and Social Mitigation Plan

Impact	Impact Description	Mitigation Measures	Implementation Plan	Responsibility	Costs

MONITORING AND REPORTING

Define the monitoring measures for each environmental and social impact identified, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements,
and thresholds that will signal the need for corrective actions. The table below may be used to present this information.

Outline the reporting procedures to be implemented during monitoring to provide information on progress, project compliance and the effectiveness of mitigation measures.

Monitoring Plan

Project Activity/Aspect	Impact	Parameter	Location	Responsibility	Frequency	Threshold	Cost

CAPACITY DEVELOPMENT AND TRAINING

Define any additional measures, such as training and additional capacity, that are required for effective implementation of mitigation measures.

CONCLUSION

Provide a summary of the ESMP.

ANNEXES

Include any additional material alluded to, but not included, in the main report.

ANNEX D: TERMS OF REFERENCE FOR ESIA/ESMP

Should any sub-project fall under category 3 and require an ESIA/ESMP to be conducted, the following terms of reference shall be utilized:

INTRODUCTION

State the purpose of the terms of reference, the name of the project to be assessed and the executing arrangements for the ESIA/ESMP.

BACKGROUND INFORMATION

Provide a brief description of the project's major components and a statement of the need for the project and its objectives. Provide information of the consultant or party conducting the ESIA. The history and current status of the project may also be included here.

OBJECTIVES

Discuss the general scope of the ESIA/ESMP.

ESIA/ESMP REQUIREMENTS

Identify regulations and guidelines which govern the conduct of the assessment and these may include World Bank Standards and Guidelines, international laws and agreements, and national laws and regulations.

SCOPE OF WORK

Description of proposed project

A comprehensive description of the project shall be presented in order to ascertain potential impacts of project implementation. The project description shall include an overview of project background and specific description of the project components as follows:

- Study area and size of the project (a locality map, clearly indicating the project location in relation to other features and shall be included)
- All associated infrastructure (construction and operation workforce, housing, water supply, access roads, machinery, borrow pits, etc.)
- Description of the construction and operation activities (phased construction activities, associated manpower size and skill levels necessary, opportunities for local labour, size and skill of local workforce)

- Waste management, including hazardous waste use, handling, and storage (diesel, fuel gasoline, lubricants)
- Worker health and safety, emergency preparation and response
- Implementation schedule

Description of Environment

This stage involves the identification of existing environmental and social conditions through review of existing information and field studies to provide a datum against which to assess the likely significant impacts of the proposed development. This is the screening and scoping phase and it achieved through desktop research, site visit and public consultations. The description of the baseline environment shall include:

- Physical environment (topography, land cover, hydrology, geology and soils, climate, etc.)
- Biological environment (flora and fauna; the consultant shall refer to the Flora Protection Act, 2001 for protected flora and fauna species)
- Social and cultural environment (population, land use, planned development activities, employment and labour market, education, sources and distribution of income, vulnerable groups, etc.)
- Economic activities

Description of the environment/baseline studies shall include:

Field surveys: A physical survey of the site characteristics and the environmental status of the surrounding areas will be conducted to determine the anticipated impacts during the construction and operational phases of the project. The 'environment' shall include the social environment as well.

Desktop study: A desktop study shall be done for the legislative review, as well as other literature on the site and the surrounding area. The consultant shall outline and describe laws and regulations relevant to the sub-project and clearly state their relevance to the project or project activities. A gap analysis explaining the additional efforts that are required to meet World Bank standards shall also be included.

Specialized Studies: Depending on the location and extent of the project, some study areas, such as socio-economic impact study, hydrological and ecological studies, may require a

specialist. Specialized studies will provide a detailed and thorough examination of key issues. The results of the specialized study will be presented in the specialized reports that will be appended in the ESIA report.

Public Consultations/Stakeholder Engagement: Interested and Affected Parties (I&AP) shall be invited to a scoping meeting through social and print media. The consultant shall prepare scoping meeting notices and display them at visible point along the project area. The purpose of stakeholder engagement is to inform, consult, involve, collaborate and empower stakeholders. In addition to stakeholders engaged during the public meeting, the consultant shall identify additional stakeholders that were not in attendance; stakeholders may be either individuals, groups or group representatives such as traditional authorities in and around the project area, government departments and relevant parastatals, and NGOs that are active in the sub-project area.

The public participation process initiated in the scoping phase shall continue in the ESIA phase. This process will provide a forum within which all I&AP and key stakeholders have the right to voice their concerns and issues regarding the project.

Legislative and Regulatory Considerations

Outline all relevant international and national laws, regulations, policies and standards that are triggered by the implementation of the project, such as those related to health and safety, protection of sensitive areas, protection of endangered species, waste management, water pollution control, etc.

Identification of Potential Impacts

This involves identification or prediction of potential impacts specific to the development based on the baseline data. This will include both positive and negative environmental and social impacts during the construction, operation and decommissioning phase. Ways in which the positive environmental and social impacts may be enhanced shall be explored.

Identified impacts shall be described in depth, and shall include cumulative impacts. Potential impacts highlighted during public consultations and stakeholder engagements shall be included so as to allow for their evaluation in latter stages. The potential impacts identified through specialist studies shall also be included in the main ESIA report.

The assessment of potential impacts shall also identify key data gaps and any uncertainties associated with the predictions; direct and indirect impacts; and, unavoidable or irreversible impacts.

Evaluation of Potential Impacts

Once the potential impacts likely to occur as a result of the proposed development have been identified, they shall be assessed in order to predict the nature or significance of the impact. In addition to taking into account the type of impact (i.e., positive or negative) the assessment will also consider:

- The probability of the impact occurring (i.e., definite, probable or unlikely);
- The extent or spatial influence of impact (i.e., regional, local or site specific)
- The magnitude of the impact (i.e., high, medium, or low)
- The duration of the impact (i.e., construction period, medium or long-term)

The evaluation criteria shall be expressed both qualitatively and quantitatively. The total impact score share determine the level of impact significance.

Analysis of Alternatives

An alternative is a possible course of action, in place of another, that would meet the same project purpose and need. Project alternatives will be explored in order to find the most effective way of meeting the need and purpose of the sub-project, either through enhancing the positive impacts or through reducing or avoiding potentially significant negative impacts.

There are different types of alternatives and not all alternatives may be applicable. Appropriate alternatives will be determined based on the intended beneficiaries (general public, select groups or individuals) and the where is the sub-project is being implemented (zoned land use, common property or private property). The types of alternatives that may be considered will include:

- Activity alternatives
- Location alternatives
- Process alternatives
- Demand alternatives
- Scheduling alternatives
- Input alternatives
- Routing alternatives
- Site layout alternatives
- Scale alternatives

- Design alternatives.

The 'no project' alternative will be considered regardless of intended beneficiaries and location of sub-projects.

Mitigation Measures & Monitoring Plan

Practical and reasonable ways to avoid or reduce the negative impact of a project shall be identified. These are known as mitigation measures. The consultant shall prepare an ESMP that presents the mitigation measures for each impact identified during the field surveys, public consultation, desktop review, specialist studies, and stakeholder engagements, for all project phase. This should also include considerations for compensation for impacts that cannot be compensated. The ESMP shall outline the project implementers, and responsibilities and institutional arrangements. The consultant shall prepare a monitoring plan that indicates the:

- parameters to be measured
- indicators
- monitoring/measurement methods to be used
- monitoring frequency
- monitoring responsibility
- thresholds that will indicate the need for corrective actions
- estimated cost for implementing the proposed mitigation measures

Staffing and training requirements shall be outlined.

Institutional and Capacity Assessment

Review the existing capacity and organizational structures for the development. Provide recommendations for strengthening them in order for the management and monitoring plans to be implemented.

Study report

The output of the assessment will be the ESIA/ESMP report that shall be prepared in accordance with Environmental Management Act, 2002 and World Bank standards. The report will be prepared in English and the consultant will submit the reports to Eswatini Environment Authority, the Ministry of Education and Training, and the relevant World Bank person(s) for review.

Information disclosure

The consultant shall prepare announcements or public notice for ESIA/ESMP public review to be published in local newspapers. The public notice shall state the locations where the document will be available and the period it will be available for.

Hard copies of the study report shall be printed and submitted to EEA who shall then place these copies at public locations for public review.

Approval

The consultant shall address any comments derived from the reviews conducted by the World Bank, Ministry of Education and Training, Eswatini Environment Authority, and the Interested and Affected Parties. Once this is done to the satisfaction of all parties involved, the ESIA/ESMP will be approved for project implementation.

ANNEX E: GENERIC TIMELINES

The generic timelines for project screening, project categorization, stakeholder engagement, and development of an ESMP are outlined below.

Generic timelines for compilation of ESMP

Activity	Description	Timeline
Screening	Screening of sub-project site and project components	1 day
	A project brief shall be prepared and submitted to Eswatini Environment Authority (EEA) for project categorization	2 days
	EEA shall conduct site screening in order to categorize project	Depends of EEA
	While the project will be categorized by EEA, the WB task manager shall also provide categorization aligned with World Bank requirement	Will be provided by WB
Compiling ESMP	Compilation of ESMP shall be preceded by stakeholder engagement and public consultations, as applicable.	3 days
	Preparation of ESMP (literature review, legislative and institutional review, roles and responsibilities, impacts and mitigation measures, monitoring plan, etc.)	7 days
Review of draft ESMP	The draft report shall be reviewed by the Ministry of Education and Training and the WB task manager to ensure that the ESMP is correct and that it involves all the necessary components	Timeframe will be provided
Information disclosure	The draft report shall be disclosed to stakeholders to allow them an opportunity to understand the risks and impacts of the project	1 week
Approval	Final Draft shall be reviewed by the World Bank's Task Manager for examination before appraisal in order to ensure that all important issues have been addressed, and to request for additional comments and provide comments before appraisal.	Timeframe will be provided by WB
	Final draft shall be review by EEA to ensure that all important issues have been addressed, and to request for additional comments and provide comments before appraisal.	Depends on EEA

ANNEX F: SIMPLE ENVIRONMENT MANAGEMENT TECHNICAL MANUAL

INTRODUCTION

This manual has been developed for the Ministry of Education and Training's (MoET) 'strengthening education and skills training systems to support human capital development in the Project. The country's laws and regulations require the MoET to ensure that the project is implemented in an environmentally and socially sustainable manner.

The details of the sub-projects are not known at this point; hence, the purpose of the Environmental Management Manual is to provide good practice guidelines the stages involved in typical project implementation, from design to operation and maintenance. The aim of the manual is to provide guidelines on sound and responsible environmental management and promote a pro-active approach to environmental management. The guidelines are not detailed and application will require tailoring them to specific site conditions and making adjustments if the guidelines provided here are not suitable for the site.

GOOD PRACTICE GUIDELINES

Stakeholder Engagement

Stakeholder engagement shall form part of the design phase to allow for significant contributions or concerns from the public to be incorporate or considered during project design. Project affected parties shall be informed about the grievance process.

Environmental Assessment

Integrating environment protection at the project planning stage ensures that measures to avoid and minimise pollution can be built into the project design and work schedule. While environmental assessments vary according to the category assigned, the assessment shall, at the least:

- Collect all relevant information on the site, and adjacent areas, that may be affected by the sub-project
- Assess all possible impacts that the project will have on the environment
- Assess impact of the development on the amenity of adjacent residents
- Devise mitigation measures for potential impacts likely to occur as a result of the project

- Prepare a monitoring plan

Resource Efficiency

Measures to promote sustainable use of resource shall be considered during the design phase of the project. Opportunities to for resource efficiency shall be identified and shall include considerations for the use of raw material, energy and water.

Dust Control

The following measures shall be taken to minimize dust generated by sub-project activities:

- Program clearing activities such that they do not occur during the late winter, where dust will be propagated by strong winds
- Apply dust suppression measures i.e., soil watering (ensure activity it does not create contaminated run-off that will contaminate surface waters)

Noise and Vibrations

All noise nuisance should be reduced wherever possible through the following measures:

- Limit the times of operation of noisy equipment vehicles and operations
- Advise local residents when unavoidable out-of-hours work will occur
- Equipment shall be regularly serviced
- Conduct a study on the impact of ground vibration from construction activities where these operations occur within 50 metres of a building and prepare a pre-crack survey where required

Waste Management

The following measures shall be followed to manage waste generated from sub-project activities:

- Promote waste minimization through reduce, re-use, recycle hierarchy
- Carry out a waste minimisation assessment which examines opportunities for waste avoidance reduction, reuse and recycling
- Waste shall be store in waste receptacles with lids
- Waste segregation shall be practised
- Waste shall be disposed at a license landfill
- Hazardous waste shall be handled and disposed by a licensed contractor

Air quality

In addition to dust, other sources of air pollution include exhaust gases from vehicles and machinery. The following shall be applied:

- Ensure that all vehicles and machinery are fitted with appropriate emission control equipment, maintained frequently and serviced to the manufacturers' specifications

Litter

Litter is often caused by thoughtlessness of staff and the unavailability of suitable litter bins on the construction site. The following measures shall be followed to ensure that litter is disposed of in a responsible manner:

- Maintain good housekeeping practices and ensure that materials are not left where they can be washed or blown away to become litter
- Provide bins for construction workers and staff at eating areas
- Conduct ongoing awareness with staff of the need to avoid littering

Grievance Mechanism

While grievances may be considered a social aspect, the concerns raised may be related to environmental issues. Where complaints are raised by the local community or surrounding establishment, the following measures shall be followed in line with ESS10:

- The grievance mechanism put in place shall be accessible and inclusive
- The contractor shall address concerns promptly and effectively
- Handling of grievances shall be done in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the needs and concerns of the project-affected parties.

Water & Soil Pollution

In the event that water and soil pollution occur due to project activities, the following shall be considered:

- Conduct analysis that includes consideration of the source, nature, and magnitude of pollution
- Identify appropriate technologies and processes for mitigation the pollution
- Monitor the effectiveness of implemented measures

Operation & maintenance

Grievance Mechanism

While grievances may be considered a social aspect, the concerns raised may be related to environmental issues. Where complaints are raised by the local community or surrounding establishment, the following measures shall be followed in line with ESS10:

- The grievance mechanism put in place shall be accessible and inclusive
- The contractor shall address concerns promptly and effectively
- Handling of grievances shall be done in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the needs and concerns of the project-affected parties.

Resource Efficiency

Opportunities to for resource efficiency shall be identified for the use of energy, water, and raw materials, such as lab chemicals.

Waste Management

The following measures shall be followed to manage waste generated from facilities:

- Promote waste minimization through reduce, re-use, recycle hierarchy
- Carry out a waste minimisation assessment which examines opportunities for waste avoidance reduction, reuse and recycling
- Waste shall be store in waste receptacles with lids
- In urban areas, waste shall be disposed at a license landfill
- Hazardous waste shall be handled and disposed by a licensed contractor

Project sites with labs shall consider the following:

- Plan experiments to be conducted so that the quantities of chemicals ordered are kept at a minimum and as a result, the disposal of hazardous material will be minimized
- Assess ways to reduce the number of steps in an experiment
- Storing hazardous waste separate from non-hazardous waste
- Explore opportunities for recycling of chemicals

ANNEX G: MINUTES OF MEETINGS & TEMPLATES

INTRODUCTION MEETING MINUTES

Date: Monday, 07 December 2020

Venue: Ministry of Education and Training Conference Room, Ground Floor

Time: 2.00 pm

Attendees:

Full Names	Designation	Email/Contact
Mgcibelo Tsela	SI-ICT	lmktsela@gmail.com
Vusi Simelane	ACTCIP	vusisim@gmail.com
Sindisiwe Nxumalo	Sociologist MTK Sustainable Technologies	sindinx69@gmail.com
Thobile Khumalo	Environmentalist MTK Sustainable Technologies	tkhumalo@mtkivest.com
Nonhlanhla Shongwe	Senior Planning Officer	shongwen81@gmail.com
Martha Shongwe	CIS	ortizmartha88@yahoo.com
Lindiwe Dlamini	ETGPS Director	directoretgps@gmail.com
Dr N.L Dlamini	Director	lenhledlamini2003@yahoo.co .uk
Gwen Simelane	SI ECCDE	gwensimelane@yahoo.com
Fikile Mdluli	MSET – CJ-T	fcmdluli@gmailcom

Attendance register is attached

Agenda:

- Introduction of Consultants to Project Management team
- Remarks by chairperson
- Discussions on expectations
- Way forward and closing

Introductions

Mr N. Gwebu introduced MTK Sustainable Technologies (Pty) Ltd team to the Ministry of Education and Training project management team. He also appreciated the attendance by Ministry officials at such short notice. He indicated that the work of the consultants in developing an ESMF is part of the preparatory stage of the project on strengthening Education and skills training systems to support human Capital development in Eswatini. He indicated

that the requirements that need to be fulfilled for the project to be submitted for review by the World Bank are:

- The Environmental and Social Management Framework (ESMF)
- Stakeholder Engagement Plan (SEP)
- Resettlement Action Plan (RAP)
- Environmental and Social Commitment Plan (ESCP)

Since resettlement is not anticipated for the project, the RAP was not seen to be necessary at this point. However, general guidelines will need to be presented in case there is a need for relocate structures during the specific projects. The ESCP will be done in-house by the MOET. He also indicated that the project timelines are very tight. He appealed with the team to cooperate with the consultants.

Remarks by Project team chairperson

The chairperson welcomed the consultants and expressed appreciation on the work that Mr. Gwebu and Ms. Shongwe had done in moving speedily with the project to the point of appointing consultants. She pledged support from her office and the team She is working with. She then introduced the project management team, which consists of leaders from the different clusters under the 4 components of the project.

Discussions on Expectations

Mrs T Khumalo from MTK Sustainable Technologies expressed appreciation for the opportunity that has been given the company in carrying out the assignment. She indicated that reports and documents that they had requested from the Ministry have been received and are very helpful. She requested that the project team gives an indication on the types areas that may be potential project sites. She stated that for the ESMF to be relevant, there should be an idea of the general areas that will be considered for the project.

Ms. Sindi Nxumalo, who is also part of the consultant team outlined the importance of stakeholder engagement to inclusive, culturally relevant and indicated that the SEP is a living document that keeps being updated as more stakeholders are discovered. She indicated that the main approach to be used in this assignment will be Key informant interviews and focus group discussions. There will not be a detailed survey.

Ms. Dlamini from MOET team wanted clarification on the involvement of external stakeholders that they work with like UNICEF.

Ms Nxumalo indicated that the information will be sourced from the project team on the role that those stakeholders play in this project. The consultants will then assist in determining their level of interest and influence in the project.

The project team also indicated that the priority stakeholders to be engaged as they are partners in the project are:

- Ministry of Health
- Deputy Prime Minister's Office
- Ministry of Sports, Culture and Youth Affairs
- Ministry of Tinkhundla Administration and Development

The consultants will have to be introduced to these stakeholders as soon as possible.

Mr. Simelane requested a template for the typical questions that will be asked during the engagements to be sent beforehand to make it easier and faster to go through discussions.

Closing and way forward

It was agreed that the MOET will help set up appointments with the key stakeholders of the project and put in place a schedule for the engagements. Shortly after the initial engagements, there will be visits to areas that may be potential sites.

MINISTRY OF EDUCATION STAKEHOLDERS WORKSHOP

Date: Wednesday, 16th of December 2020

Venue: Thokoza Conference Room

Time: 8:30 am

Attendees

Full Names	Organization	Designation	Contact	Email Address
Shongwe Ayanda	MoET	Inspector -IG	7628 1731	Ayandash1@gmail.com
Vusi Simelane	MoET	Acting Chief	7604 8161	vusisim@gmail.com
Simon Maseko	EDC	Vice Principal	7826 1966	Simon323maseko@gmail.com

Sanelisiwe Nkonyane	NCC	Teacher Education/Designer	7674 9640	sanelisiwe@yahoo.co.uk
Nonhlanhla Shongwe	MoET	Senior Planning Officer	7673 8150	Shongwen81@gmail.com
Thembi Glory Mdluli	MoET	Principal Accountant	7626 8466	glorymdluli@gmail.com
Zethu Ntuli	NCC	Designer	7635 7574	zethu@yahoo.com
Turu Dube	MoET	SI - Science	7614 6392	Dubeturu0000@gmail.com
Pinky Masuku (Virtual)	MoET	Guidance and Counselling		
Zanele Nxumalo (Virtual)	MoH	Planning Officer		
Nelisiwe Dlamini (Virtual)	MoET	EMIS Unit		
Dudu Hlophe	MoET	ECCDE	7643 9094	Dudu08hlophe@gmail.com
Mangaliso Simelane	MSCYA	RSO	7611 7735	seefes@gmail.com
Sifiso Fakudze	MoET	EMIS	7657 4552	Mo209721@gmail
Constance Masina	ECOT	Vice Principal	7614 4068	masinaconstance@gmail.com
Simphiwe Dlamini	MTK	Environmentalist	7653 4002	simphiwemtk@gmail.com
Sakhile Dlamini	MICT	Senior	7604 4813	sakhilebongani@gmail.com
Lindokuhle Methule	MTK	Environmentalist	7628 3696	Lindom@mtkinvest.com
Phumzile Hlophe	UNESCO	Secretary General	7604 2973	Phumzile_hlophe@yahoo.com
Futhi Mhlongo (Virtual)	MoET (William Pitcher)	Vice Principal		
Sipho Hurube	MoET/NCC Department	Driver	7612 1733	

Lonyaka Dlamini (Virtual)	MoET (Special Education)	Inspector Special Education Needs		
Nelisiwe Ndwandwe (Virtual)	MoET	Programs Officer		
Sifiso Mamba (Virtual)	MoH	Planning Officer		
Thobile Khumalo	MTK	Consultant	7602 4256	Sustainable@mtkinvest.com
Sindisiwe Nxumalo	MTK	Sociologist	7611 0320	Sindinx69@gmail.com

Attendance Register is attached.

MTK Sustainable Technologies facilitated registration and all members/representatives present registered their personal details. Some registered representatives joined the meeting virtually.

Agenda:

- Opening prayer
- Welcome remarks
- Overview of project
- Methodologies of ESMF and SEP
- Introduction of stakeholders
- SEP under each component
- ESMF under each component
- Report back from each component

Opening Prayer

Mrs Zethu Ntuli opened meeting with prayer.

Welcome Remarks

Mrs Nonhlanlha Shongwe welcomed all stakeholders present into the meeting. She then explained the importance of housekeeping and also the importance of adhering to the Covid-19 regulations. With regards to housekeeping, Mrs Shongwe urged representatives to; participate actively during the meeting, make sure that gadgets do not distract other

stakeholders in the room during the meeting, respect, and treat each other well. She also requested that stakeholders be prompt during tea break.

In relation to the Covid-19 protocols, Mrs Shongwe urged stakeholders to; maintain the stipulated social distance, ensure that they always have their masks on during the meeting, avoid hugging each other, and also avoid sharing stuff during the meeting.

Overview of Project

Mrs Shongwe clarified that the Ministry of Education with the support of the World Bank is preparing for a human capital project. She then mentioned that the objective of the project is to try to improve access completion and quality of basic education including early childhood development and education, skills training, and support services for girls and boys and youth in Eswatini. She mentioned that the project will; try and improve issues of access and ensure that students complete the education cycle and make sure that what they get from the education system is of quality. She then stated that the project will cover 5 years beginning from 2021 – 2026 and it will take a life cycle approach to developing human capital, so it will contribute to the human capital of the country. It will focus on the different stages of growth of an individual, starting as early as early childhood development and taking care of the learning means of the child on primary and secondary level, and then also supporting the youth for them to have a chance in life especially those who have not have the opportunity to complete the education. The project is taking that approach to try and bring a complete message package. The beneficiaries are the children so that they reach their full potential and be proactive when they join the work force.

In terms of the project components, Ms Shongwe explained that the project has four components;

- 1st Component is on strengthening coordination and regulation of ECDE (Early Childhood Development Education) and improving access to quality ECDE services and education. This component has three sub-components; the 1st sub-component has to do with coordination and understanding of ECDE services. Under this sub-component, Ms Shongwe mentioned that the ministry will be working with the Deputy Prime Minister's Office. Sub-component 2 involves developing and implementing system level guidelines, policies and regulations. Lastly, sub-component 3 will include strengthening the quality of ECDE services in targeted areas. Sub-component 1:2 and

1:3 is led by the Ministry of Education and training still working close with the Ministry of Health, Tinkhundla and so on.

- 2nd Component is on improving internal efficiency and quality in basic education. Under this component there are three sub-components; sub-component 2:1 will be on early grades reading numeracy and assessments which basically focuses on strengthening reading numeracy in mathematics and also strengthening assessments. The project will ensure that the foundation laid for curriculums is very strong when it comes to numeracy and literacy. Sub-component 2.2 is on improving retention at junior secondary level. Ms Nonhlanhla Shongwe stated that at secondary level there are no participants, a lot of students drop out and do not complete junior secondary, so through this project, the ministry will ensure that all learners enter junior secondary and complete. She further mentioned that the number of interventions that the ministry has deliberated and are bringing on under improving retention include introducing or strengthening in school and out of school class and also includes strengthening the current OVC branch to be more effective. It also includes strengthening mathematics and science at junior secondary level where the ministry is looking at integrating ICT in the teaching of math and science. Sub-component 2:2 will also include prompting assessments, strengthening assessments, and strengthening classrooms observation. Sub-component 2:3 involves supporting ICT at tertiary level.

- 3rd Component will be on improving employment prospects for the youth through the provision of TVET and support services. Mrs Shongwe stated that this component has two sub-components; the first sub-component being implemented will involve the Ministry of Youth Sports and Culture. Here the ministry of education will be improving services to support youth so that they gain skills and the ministry is hoping to reach the youth through the different centres. The second sub-component will be mainly on tackling technical and vocational education and training for youth in targeted economic sectors.

- 4th Component is on Capacity Building and technical support for the project. This component will be on how the project will be implemented, and how it is going to be managed.

After explaining the four components of the project, Ms Shongwe explained the six stages of the project's lifecycle;

- Identification stage
- Preparation stage
- Appraisal stage
- Negotiation and board approval stage
- Implementation of the project
- Completion stage

Ms Shongwe mentioned that the project has completed the identification stage and is currently in the preparation stage. She further explained that under the preparation stage there are a number of assessments that the World Bank carries out to try and see that the support the Ministry of Education is requesting is really addressing the needs which are; the Ministry's capacity in terms of the financials, the kind of assistance needed by the ministry, and the financial and procurement aspect. The other aspect looked into is the Environmental and Social aspect of the project which focus on how environmental and social aspects of the project will be addressed and also the environmental impacts of the project.

In relation to the preparation stage, Ms Nonhlanhla Shongwe stated that it is the Ministry's duty to prepare safeguards instruments. With regards to environmental and social assessments, an environmental management plan will be developed if there will be major environmental and social issues.

Ms Shongwe also elaborated on the appraisal stage of the project. She explained that in this stage the World Bank will assess whether the project should continue and if they will go ahead in funding the project. She also explained that there are legal agreements that will have to be made. She then explained the negotiation and board approval stage which involve a sit down between government and the World Bank to see what role will be played by government and what role to be played by the World Bank and negotiate some of the terms under the project.

Stage 5 involve implementing the project and stage 6 is the completion and evaluation stage.

Upon explaining all the stages of project, Ms Shongwe stated that explaining the stages gives an idea of how far the team is in terms of the project. She later highlighted that the project requires commitment from all the stakeholders.

She then mentioned instruments that needs to be developed for the project which are; the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan

(SEP), Environmental and Social Commitment Plan (ESCP), and the Resettlement Policy Framework (RPF).

Ms Shongwe also stated that the project will not involve construction from scratch but the project will only cover minor renovations, for example, community pre-schools, and Gogo centres.

As explained by Ms Shongwe, the project was given a moderate risk rating under the social and environmental safeguards. The Ministry has engaged a consultant that will be working with the ministry to undertake the assessments, basically developing two main instruments; the ESMF and SEP.

Ms Nonhlanhla Shongwe introduced the consultant and handed over the next presentation to the consultant.

Methodologies of ESMF and SEP

Mrs T Khumalo from MTK Sustainable Technologies introduced ESMF and SEP team members to the stakeholders and thereafter presented the methodology for the ESMF. Mrs Khumalo stated that the ESMF and SEP will look at issues that will ensure that the project is environmentally and socially sustainable through its life cycle. She then mentioned that there are two deliveries expected from the assignment which are the environmental and social management framework and the stakeholder engagement plan. She revealed that Ms S Nxumalo will take over the stakeholder engagement plan. For the consultant to adequately address the terms of reference that the consultant has been presented with, a desktop service will have to be done. The consultant will also have to look at documents relevant to the project, for example; legislations. Mrs Khumalo also stated that another activity will include visiting potential sites or sample potential sites so that the document produced is relevant to the project. She mentioned that when the consultant visits the sites, the baseline conditions that will be looked at will be on; how is the environment, how are the facilities, how is the water supply and sanitation, waste management, also look at social issues since those can present significant issues.

After the baseline conditions have been looked at, the consultant will then decide on the mitigation measures to be implemented. All the mentioned issues will help the consultant in knowing the environmental and social risk of the project. From the risks that have been identified, the consultant will look at the mitigation plan taking into consideration the hierarchy of mitigation which first look at the measures to prevent like can the risk be prevented,

secondly; can the risk be reduced to avoid its severity. If the risk can't be reduced, can the risk be dealt with?

Mrs T Khumalo elaborated that another activity to be conducted during the exercise include institutions that are involved in the project. The key institutions involved in the project will be assessed to see if there is enough capacity to address the issues of environmental and social management risks of the project. She further explained that another key component of the project would be monitoring plan where the focus will be on each mitigation measure and what needs to be done by who and what resources are needed to be able to do that. She also stated that the assessment will look at previous conflict resolution mechanism. She also explained that there are issues that may arise and be faced by communities as a result of disagreements on how certain things should be done during the project. To try and resolve that, the consultant will propose procedures and mechanisms to ensure that those identified issues do not pose a significant threat to the implementation of the project. Mrs Khumalo stated that all the activities outlined will then form the document. The key thing she mentioned was that the baseline conditions will be assessed so that the consultant will be able to assess risks present and then use the hierarchy outlined. After compiling the report, it will be submitted with the input from stakeholders to the Ministry of Education and the World Bank to be revised until it is approved for implementation.

Mrs Khumalo indicated that the key milestones of the project included; signing of the contract which was done on 2nd of December, compiling the inception report which was done on the 9th of December. She then mentioned that currently the consultant is working on developing the ESMF and SEP, so now the consultant is trying to get as much information as it can from stakeholders. One of the big items of the exercise is to have a clear understanding of the details of the project and also help in getting input from stakeholders around here. She further explained that the final report for the ESMF will be completed on 15th of January 2021 and the SEP will be completed on the 20th of January 2021. Mrs Khumalo then handed over the rest of the presentation to Ms Sindi Nxumalo who will be developing the stakeholder engagement plan.

Ms Sindi Nxumalo explained that stakeholder engagement plan is important since it controls the principle that when doing a project anyone who is interested or affected in anyway by the project has been engaged to show commitment. This exercise shows integrity that the affected

and interested have been engaged in the process. Another principle is that of respect since a project that follows this principle is more likely to be successful. Ms Nxumalo stated that the consultant will ensure transparency during the process so that everybody knows what is happening. Nxumalo supported that transparency will bring a sense of trust in the entire project. Ms Sindi mentioned that if the principle of engaging the stakeholders is followed it will help in managing costs because the risk involved is understood. She further explained that this process will enhance reputation as a project implementer for the fact that you consulted from a wide pool of people. This activity also helps in avoiding conflict and will also help in managing expectations. Ms Nxumalo stated that what has to follow is the identification of relevant stakeholders under each component like the ECDE, basic education component, youth component, and vocational planning, and then identify the players and experts under each component. Ms Nxumalo emphasized that without stakeholders the project team would not be able to achieve goals. She stated that the stakeholder engagement will include discussions with people to analyse the needs in different sectors. She also stated that there would be a broad environmental and social management framework and a broad stakeholder engagement plan. There will also be a site-specific stakeholder management plan.

In closing, Ms S Nxumalo asked stakeholders from the Ministry of Education what they perceive to be their roles and responsibilities under the project. She also requested the Ministry to help the consultant in identifying other stakeholders who have not approached the consultant, the partners that the ministry work with, and the people who make work for the ministry possible and who would give the ministry the desired outcome possible under each component. She also mentioned that the consultant would like to find out the stakeholders' level of importance and also find out how they can be reached since some people prefer WhatsApp or emails and sometimes, for certain stakeholders, they might need documents or leaflets to get information. Also, the frequency is important because people are not the same, some people need the project management team to conduct weekly meetings. In conclusion she asked the present stakeholders to indicate their role, mandate, objective and responsibility in the template circulated during the meeting for the project. She also requested that they indicate the partners they work with.

Introduction of Stakeholders

All stakeholders present during the meeting introduced themselves and explained their role in the project. The objective of this activity was to clarify the relevance of the stakeholder to the project in relation to the project components. The table illustrate the stakeholders and their relevance to the project:

Name and Surname	Name of organization	Stakeholder's Relevance to the project
Masina Constance	ECOT	▪ Assist in the strengthening of links between TVET institutions and government and the industry as well as accreditation board. ▪ Help procure software, infrastructure and hardware for different programmes.
Mangaliso Simelane	MSCYA	▪ Enhance career and entrepreneurship skills.
Vusi Simelane	MoET	▪ Ensure quality education especially in primary level. ▪ Provide funding and primary school materials for all public primary schools.
Sakhile Dlamini	MICT	▪ Provide support to education to enhance learning of ICT as a subject and the use or leveraging on ICT as a tool for teaching and learning. ▪ Will embrace ICT as a tool in learning and teaching for schools.
Dudu Hlophe	MoET	▪ Monitor service provision. ▪ Ensure availability and implementation of policies. ▪ Ensure that teachers are relevantly trained. ▪ Work with NCC for curriculum development.
Sanelisiwe Nkonyane	National Curriculum Controls	▪ Develop teaching and learning materials. ▪ Develop policies and guidelines. ▪ Improve literacy and numeracy in early grades. ▪ Enables teaching and learning in maths and science.
Simon Maseko	Emlalatini Development Centre	▪ Develop print-based and online learning materials. ▪ Integrate technology enabled teaching and learning technologies into blended learning. ▪ Establish study centres for face-to-face training sessions. ▪ Procure TEL and online hardware and software. ▪ Recruit study centre coordinators, tutors, quality assures, ICT personnel and Editors including their training. ▪ Recruit and train course writers.

		▪ Use technology enabled teaching and learning technologies to teach courses for sustainable development.
Futhi Mhlongo	MoET (Willian Pitcher)	▪ Prepare teachers for secondary education and primary education. ▪ Also prepare teachers that are relevant to address some of the issues that are being raised in the project.
Nelisiwe Ndwandwe	UNESCO	▪ Support government and other organizations in the implementation of projects under ECDE. ▪ Implement some components of the project like the ECDE.
Phumzile Hlophe	UNESCO	▪ Support the ministry of education when carrying out its work.
Nelisiwe Dlamini	MoET	▪ Will get into the details of monitoring and evaluation under each component and try to address issues of assessments.
Simon Maseko	EDC	▪ Take education closer to where people live. ▪ Pay attention to adults and those who have dropped out of school by giving them a second opportunity to continue with education.
Mangaliso Simelane	MSCYA	▪ Develop youth both in and out of school through sports, arts and culture.
Dudu Hlophe	MoET	▪ Look at the service delivered for the ECDE; the educational aspect of services. ▪ Look at improving access and quality and also look into guidelines that have to be in place and see if they are well implemented.
Ayanda Shongwe	MoET	▪ Look at ICT in learning and teaching of maths and science.
Turu Dube	MoET	▪ Assure quality particularly in science in basic education. ▪ Focus is on secondary schools but sometimes assist in primary schools. ▪ Conduct workshops for education development for teachers.

SEP under Each Component

Ms Sindisiwe Nxumalo mentioned that the consultant would like to know about the infrastructure; what is needed. Ms Nonhlanhla Shongwe responded that under ECDE there will be minor renovations which will include; site rehabilitations and upgrading of laboratories. She also revealed that community pre-schools are not in good condition so they need to be attended to in order to meet the required standard. Ms Shongwe stated that NCP structures will also be renovated to meet the standard required. The ministry promised to do a quick assessment for schools that need renovations and Ms Nxumalo thanked the ministry for considering that exercise since not knowing the specific sites may pose as a challenge for the consultant.

ESMF under Each Component

Mrs T Khumalo explained environmental issues that may be a challenge to the project of which could be; pollution, waste production, occupational health and safety for those appointed to do the renovations. She as well mentioned that not knowing the potential sites may be a challenge for the consultant while doing the assessment.

Report Back from Each Component Group

The table below illustrate feedback from the different stakeholders under each component.

Stakeholder Consulted	Mandate	Other Relevant Stakeholders
Constance Masina (ECOT)	▪ Offer technical and vocational education. ▪ Pro-active in technological changes. ▪ Produce employable graduates.	➢ ESHEC ➢ UNESWA ➢ Industries ➢ Associations - Industry
Simon Maseko (Emlalatini Development Centre)	▪ Dream of providing TVET technology – enabled courses. ▪ Provide quality secondary education to the out of school youth and adults through open and distance learning (ODL), blended learning (face-to-face and online learning).	➢ The Commonwealth of learning ➢ Schools (source of tutors and accommodation ➢ Parents and guardians

Sanelisiwe Nkonyane (National Curriculum Centre)	▪ Interpret policies and develop teaching and learning materials for schools in the Kingdom of Eswatini.	➢ Macmillan ➢ UNICEF ➢ UNFPA ➢ Various colleges ➢ UNESCO
Dudu Hlophe (MoET)	▪ Ensure access and quality. ▪ Monitor services delivery. ▪ Ensure availability of guidelines and policies and its implementation.	➢ Deputy Prime Minister's Office (DPMO) ➢ Ministry of Health ➢ ECCDE Network ➢ UNESCO ➢ UNICEF
Sakhile Dlamini (MICT)	▪ Provide an enabling environment for the use of ICTs, including in education.	➢ Academia (Colleges and Universities) ➢ ICT Regulator ➢ ESCCOM ➢ EPTC-the Telecom operator ➢ Mobile Network Operators ➢ Internet Service Providers (ISPs) ➢ E-government Unit
Vusi Simelane (MoET)	▪ Improve literacy and numeracy in early grades. ▪ Provide funding and primary school materials for all public primary schools.	➢ Macmillan Publishers ➢ Stationery and exercise books suppliers
Mangaliso Simelane (MSCYA)	▪ Increase youth independence. ▪ Enhance career and entrepreneurship skills. ▪ Increase youth awareness, businesses and career opportunities. ▪ Strengthen relations with private sectors to engage with youth.	➢ National Sports Council ➢ National Council of Arts and Culture ➢ Eswatini National Youth Council ➢ Junior Achievement ➢ Eswatini Olympic Commonwealth Games Associations

		➢ Enactus ➢ Catalyz ➢ UNFPA ➢ UNDP ➢ UNESCO
Zethu Ntuli National Curriculum Centre	• Develop curriculum that is relevant, integrated and age appropriate for children between 3 and 6 holistic developments ▪ Finalize grade 0 instructional material pilot and implement ▪ Develop for the levels below age 5 ▪ Develop in collaboration with other ministries for 0-3	➢ SANU, ➢ Ngwane College ➢ UNESCO
Cebsile P. Nxumalo MoET	▪ Provide leadership and strategic planning for Special and Inclusive Education in the country ▪ Supervise a team of regional inspectors for Special Education Needs. ▪ Provide leadership in setting performance targets for special education needs and writing performance reports on a quarterly and annual basis ▪ Ensure that Special and Inclusive Education as a cross-cutting issue is mainstreamed in all programmes at all levels in the education system ▪ Provide leadership in the development of policies, guidelines and frameworks related to Special and Inclusive Education Provide guidance on and quality control on curriculum development for learners with special education needs ▪ Ensure that learners with special needs receive inclusive quality education at all levels ▪ Coordinate workshops on Special Education Needs and Inclusive Education for educators such as inspectors, in-service providers, principals and teachers on Special and	UNICEF Swaziland Networks on Education for All (SWANCEFA) Save the Children Fund Eswatini Communication Commission (ESCCOM) Federation of Persons with Disabilities (FODSWA) and their affiliates i.e., Eswatini Association for the Visually Impaired; Eswatini National Association for the Deaf; Association for the Physically Disabled Autism Eswatini ESwatini Revenue Authority MTN Eswatini

	Inclusive Education ▪ Link the Ministry of Education and Training with other Stakeholders and Development Partners ▪ Play an advisory role on matters related to Special and Inclusive Education ▪ Conduct research on current trends in special and inclusive education and develop networks for collaboration and benchmarking purpose	Swaziland Council of Churches
Turu Dube MoET	Quality assurance for science teaching in schools. Capacity development of science teachers through in-service. Participation in Science curriculum development. ▪ Collaboration with pre-service teacher training institutions, especially William Pitcher College.	➢ NCC ➢ UNESWA
Mfanfikile Mabuza MoSCYA	▪ *Coordination of youth development stakeholders* ▪ *Alignment with government priorities and policies* ▪ *Monitoring and evaluation* ▪ *Reporting*	➢ *Junior Achievement* ➢ *Enactus* ➢ *National Youth Council* ➢ *UNFPA* ➢ *Catalyze* ➢ *Namboard*
Nelisiwe Nick Ndwandwe UNESCO	▪ Support the development of Strategy for TVET (2016-2021) in alignment with Sustainable Development Goal 4 and the Education 2030 Framework for Action to strengthen TVET systems of the Kingdom of government of Eswatini and advance youth employment, access to decent work, entrepreneurship and lifelong learning opportunities the Eswatini contexts, under three priority areas: Fostering youth employment and entrepreneurship, Promoting equity and gender equality, and Facilitating the transition to green economies and sustainable societies. ▪ Promoting equity and gender equality.	➢ *Sebenta National Institute*

	▪ Facilitating the transition to green economies and sustainable societies. ▪ Supports Member States in reviewing their TVET policies through analysis and alignment of key policy areas. ▪ Supports the development of sustainable TVET financing mechanisms, with the view to mobilize resources for the implementation and of the implementation from the TVET Strategy. ▪ Support the country in providing access for young people to quality skills training for the world of work and self-employment to directly address the issue of growing youth unemployment through TVET. ▪ Support a smooth transition to green economies through appropriate strategies, cross-sector synergies and partnerships.	

Closing Remarks

Mrs N Shongwe thanked all present stakeholders and mentioned that the consultant would appreciate feedback from the different stakeholders. She also urged the participants to work well with the ministry. Lastly, she stated the project will change the lives of children and then adjourned the meeting.

CONSULATIONS WITH AFFECTED PARTIES FOR BASELINE ENVIRONMENT DATA

Date: 07 January 2021

Venue: Shewula Primary School

Time: 15:00

Attendees

Name & Surname	Organization	Designation
S. Mgomezulu	Shewula Primary School	Principal
Lindo Methule	MTK Sustainable Technologies	Environmentalist
Simphiwe Dlamini	MTK Sustainable Technologies	Environmentalist

Attendance register is attached

Agenda:

- Present overview of project
- Record observations relating to physical state of the school
- Discuss environmental and social issues experienced by pupils and teachers

Introductions

Mr M welcomed MTK Sustainable Technologies (MTK) upon arrive at the school. Ms L Methule introduced the MTK team and their role in the project. Mr M introduced himself as the principal for Shewula Primary School.

Discussions

When questioned about the school's access to utilities, Mr M indicated that:

- The school has access to electricity, water, and cell phone networks.
- The water is supplied through a borehole constructed by World Vision, and electricity is supplied by Eswatini Electricity Company (ECC).
- Eswatini Post and Telecommunication infrastructure is in place, but no connection has been made.
- The school has no access to WI-FI connection

Ms L Methule questioned how the school manages the waste generated and Mr M indicated that the school has strategically placed waste receptacles in the school yard for temporal storage of waste; there are 5 used to store and burn combustible waste material; incombustible waste is collected by community members who later sell to facilities in Matsapha.

While doing a walk-about Ms L Methule asked Mr M to describe the physical state of the school. Mr M commented that some classes had damaged doors, floors and ceilings. He also added that the classes do not have electricity connections, only the administrative block has a connection at the moment.

When questioned about sanitary facilities, Mr M responded that the school has 24 pit latrines for learners and 4 for teachers. He stated that toilet paper, water, and handwashing soap is provided at all times for both students and teachers. He also highlighted that the school sometimes run short of finances to buy enough equipment for both learners and teachers.

Ms L Methule then asked Mr M to provide some of the issues he believes are experienced by the teachers and pupils at his school. Mr M responded with the following issues relating to teachers:

- Teachers have no staff room; they use the students' library
- There is inadequate furniture for administration block and teachers
- Space constraints in administration block
- The lack of services in the area and surrounding areas means that teachers travel long distances to for services such as banks, groceries stores, etc.
- Teachers who are married often opt to live at home with their spouses. The poor public transport service in the area means that those teachers are often late or do not make it to school at all when transport is unavailable.
- There is insufficient housing for teachers. Some teachers are forced to share accommodation as a result.

Mr M noted the following issues relating to students:

- Due to difficulties at home, some learners are not enthusiastic about education/learning. Some children come from child-headed households, most of them travel long distances to get to school, and others come to school on empty stomachs
- Early pregnancy results in drop out of students, particularly in grade 6 and grade 7.

- Some students spend a significant part of their primary school life with worn out, torn uniform.
- Some pupils believe that dagga farming will be more beneficial to them than school and drop out of school or miss school to farm dagga

Mr M also added that the current curriculum is outdated and is not beneficial to the student once they leave school in term of entrepreneurship skills. He indicated that most students suffer when they complete school because they lack an understanding and the skills to produce handicrafts and make a living. He therefore emphasised that the government needs to introduce vocational classes in all grades, including primary school, and invest the necessary resources.

Date: 07 January 2021

Venue: Telephonic

Meeting conducted by Sindi Nxumalo, a sociologist from MTK Sustainable Technologies. Meeting attended by Mr Nxumalo, Principal of Mkhuzweni Gija high School.

Discussions

The key objective of the school is to give Eswatini children access to affordable quality education. There should be greater recognition that rural children also need quality.

The most important areas are maths, science and design technology. In the past the school had a partner in Peace Corps for provision of teachers. Teachers are the most expensive item with most of government's budget going towards salaries. The next expensive item is learning materials.

Key challenges are the teacher to student ratios in practical subjects. It should be noted that many learners are not academic and quickly lose interest if they are not 'hands-on'. Even the practical subjects end up being theoretical in nature.

The technical subjects need more space and more devices so that learners can have maximum contact time. There is need for more computer and design technology labs. Currently the computer labs are dominated by the learners who are preparing for exams as they are the priority. It means that other learners only get to work with computers when they get to form 4 which is too late.

Although the school has access to electricity, many homes do not, so learning ends at school.

With regards to retention and related social challenges, the student numbers in classrooms make it difficult for learners and teachers to focus. Teachers are not well trained to handle the challenges they meet once in a real classroom setting and do not know how to engage with learners with different learning abilities. Learners routinely skip out on classes when they feel left behind. This leads to disciplinary issues. The current approach is not adapted to the needs of learners and of the market because all government money goes towards salaries but there is no discernible product. If this situation continues it will not only lead to more 'drop-outs' but ultimately to civil strife as we are failing our children.

There have been some instances of theft of equipment so any new labs have to be secure.

Date: 07 January 2021

Venue: Tikhuba High School

Time: 12:00

Attendees:

Name & Surname	Organization	Designation
Bongani Magongo	Tikhuba Primary School	Senior teacher
Lindo Methule	MTK Sustainable Technologies	Environmentalist
Simphiwe Dlamini	MTK Sustainable Technologies	Environmentalist

Agenda:

- Present overview of project
- Record observations relating to physical state of the school
- Discuss environmental and social issues experienced by pupils and teachers

Discussions

Mr M noted the following with regards to access to the school's utilities:

- Electricity is supplied by EEC. The administration block was powered by solar power in the past. The installation of the solar panels was a pilot project implemented by Eco-library and Ministry of Natural Resources. The equipment was damaged due to design failures. All buildings are not supplied by EEC.
- The school has access to water supply. Water is pumped from a nearby spring into four 10 000 litre tanks. However, water levels have dropped drastically since 2015 and it now takes about three days to fill up a single tank.
- EPTC connection available. However, the service is not reliable since outages are experienced often due to optic fibre theft.
- Attempts to establish an internet connection via WI-FI was made in the past. This was unsuccessful; the company responsible for setting up the connection reported that the signal was too weak. Alternative means are still being considered. Internet connection is available for the IT lab, although it is not reliable. This connection is provided by EPTC.

Ms S Dlamini asked how the school manages the waste generated by the various activities. Mr M stated that waste generated is stored temporarily in waste receptacles and later stored

and burnt in waste pits. He also mentioned that the number of waste receptacles currently provided is inadequate for the size of the school.

During a walk-about, Mr M was questioned about the physical state of the structures and he mentioned that while the buildings look okay from the outside, most of the classrooms inside are in a dire and dilapidated state. This is indicated by broken windows, lack of door handles, chipped furniture, damaged floors and walls. He also mentioned that water supply to science labs is no longer available; the lab equipment is insufficient; lab chemicals are unavailable; desktops outdated; sporting equipment (tennis table, chess board) damaged.

He highlighted that student pay maintenance fees that is used to repair minor structural issues, such as broken windows.

With regards to sanitation and sanitary facilities, Mr M stated that the school has six pit latrines are available – three per gender; two toilet papers are provided per class, per day; running water is available for drinking and hand washing.

Ms S Dlamini asked Mr M about the social issues that he believes are experienced by pupils and teachers. Mr M responded with the following:

- High drop-out rate due to teenage pregnancies, especially for lower grades and completing classes.
- Lack of public transport means that most students have to walk about 10km or more per day
- Students are normally tired during class due to the walking distance between home and school
- Students arrive to school late due to lack of public transport and the walking distance
- Road conditions influence the school's inability to retain teachers. Teachers normally work for a few months or few years then leave because of the damaged to their cars.
- The water pump is old and does not perform well. The school sometimes goes days with water when the pump is not functioning. The Ministry of Education provides water in tankers when this problem occurs.
- Limited number of students being enrolled into subjects due to the size of the classes. For example, most students are interested in studying Home Economics, but aren't able to do that because the class can only take a certain number of students per class.

Mr M also mentioned that the curriculum is outdated and some improvements are required. He stated that the improvements could focus more on vocational skills and other practical areas like design and technology.

TOOLS USED FOR DATA COLLECTION DURING WORKSHOP

STAKEHOLDER ENGAGEMENT PLAN: COMPONENT 1

<table>
<tr><td colspan="4">Project Component 1: ECDE
Coordination of ECDE services (Education/Nutrition/Health/WASH/Social protection)
Development of policies and guidelines
Mapping of ECD services
Teaching / learning materials and professional development
Targeted ECD centres to be supported</td></tr>
<tr><td>Name:</td><td>Your Organisation:</td><td>Designation in organisation:</td><td>Cell Number:
Email address:</td></tr>
<tr><td>Key Objectives / mandate of your organisation
(bullet points)</td><td colspan="3"></td></tr>
<tr><td>Your key roles and responsibilities under the project
(bullet points)</td><td colspan="3"></td></tr>
<tr><td>Other than government ministries; who are your main partners? (List)</td><td colspan="3"></td></tr>
<tr><td>What is the best method of contacting you?</td><td colspan="3"></td></tr>
</table>

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK: COMPONENT 1

Project Component 1: ECDE • Coordination of ECDE services (Education/Nutrition/Health/WASH/Social protection) • Development of policies and guidelines • Mapping of ECD services • Teaching / learning materials and professional development • Targeted ECD centres to be supported	
What physical infrastructure activities do you anticipate under this project?	
What environmental challenges do you anticipate arising from these activities?	
What social factors present risks / challenges to the project?	
What are possible mitigation measures?	
What is the current status of WASH in the sector?	
What possible mitigation measure need to be put in place?	

STAKEHOLDER ENGAGEMENT PLAN: COMPONENT 2

Project Component 2: Basic Education • Improving Literacy and Numeracy in Early Grades • Retention (Psycho-social support/ teen pregnancy/substance abuse) • OVC Education program • Girls and Boys Clubs • ICT enabled teaching and learning in Math and Science			
Name:	*Your Organisation:*	*Designation in organisation:*	*Cell Number:* *Email address:*
Key Objectives / mandate of your organisation *(bullet points)*			
Your key roles and responsibilities under the project *(bullet points)*			
Other than government ministries; who are your main partners? (List)			
What is the best method of contacting you?			

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK: COMPONENT 2

Project Component 2: Basic Education • Improving Literacy and Numeracy in Early Grades • Retention (Psycho-social support/ teen pregnancy/substance abuse) • OVC Education program • Girls and Boys Clubs • ICT enabled teaching and learning in Math and Science	
What physical infrastructure activities do you anticipate under this project?	
What environmental challenges do you anticipate arising from these activities?	
What social factors present risks / challenges to the project?	
What are possible mitigation measures?	
What is the current status of WASH in the sector?	
What possible mitigation measure need to be put in place?	

STAKEHOLDER ENGAGEMENT PLAN: COMPONENT 3

Project Component 3: Employment to improvement of TVET • TVET institutions • National Qualifications Framework • Priority economic sectors /labour markets • Youth 'job' Centres			
Name:	*Your Organisation:*	*Designation in organisation:*	*Cell Number:* *Email address:*
Key Objectives / mandate of your organisation *(bullet points)*			
Your key roles and responsibilities under the project *(bullet points)*			
Other than government ministries; who are your main partners? (List)			
What is the best method of contacting you?			

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK: COMPONENT 3

Project Component 3: Employment to improvement of TVET • TVET institutions • National Qualifications Framework • Priority economic sectors /labour markets • Youth 'job' Centres	
What physical infrastructure activities do you anticipate under this project?	
What environmental challenges do you anticipate arising from these activities?	
What social factors present risks / challenges to the project?	
What are possible mitigation measures?	
What is the current status of WASH in the sector?	

TOOL USED FOR BASELINE DATA COLLECTION AT SAMPLED LOCATIONS

Component	Site	Findings
	[School name]	Observations: 1. Access to utilities (electricity, water, EPTC, Mobile Network coverage) 2. Waste Management 3. Physical State of Structures 4. Sanitation 5. Number of Classes 6. Social Issues relating to pupils and teachers

ANNEX H: LABOUR AND WORKER MANAGEMENT PROCEDURE

Abbreviations List	
CoC	Code of Conduct
CMAC	Conciliation Mediation and Arbitration Commission
DPMO	Deputy Prime Minister's Office
ECDE	Early Childhood Development Education
EHSGs	Environment Health and Safety Guidelines
ESS	Environment and Social Standards
FM	Financial Management
GBV	Gender base Violence
HCI	Human Capital Index
ICT	Information and Communication Technology
LWMP	Labour and Worker Management Procedures
MEPD	Ministry of Economic Planning and Development
MoET	Ministry of Education and Training
NCP	Neighbourhood Care Point
OVC	Orphan and Vulnerable Children
PDO	Project Development Objective
PSU	Project Support Unit
PPE	Personal Protective Equipment
SEA	Sexual Exploitation Abuse
STEM	Science Technology Engineering and Mathematics
TVET	Technical and Vocational Educational and Training

INTRODUCTION

This Labour and Worker Management Procedure (LWMP) was developed by MTK Sustainable Technologies to manage risks under the Education and Training Strengthening for Human Capital Development in Eswatini Project funded by the World Bank. This Labour and Worker Management Procedure for the Ministry of Education and Training, strengthening education and skills training systems to support human capital development in Eswatini Project has been prepared to meet the objectives and requirements of Environment and Social Standards (ESS); ESS2 and ESS4 as well as the National Law. The procedure assesses the potential risks and impacts of assignment of labour for the implementation of component 1, 2 and 3 of the projects and address them through mitigation measures in light of Environmental and Social Standards and Labour policies and provisions.

Project Development Objective (PDO)

The PDO is to strengthen education service delivery and management systems to improve the quality of education in the early years and junior secondary education in targeted areas.[18]

The PDO level indicators will be as follows:

- Establishing learning assessment systems to measure child development, early grade reading and mathematics and junior secondary learning outcomes
- Percentage of targeted ECCDE providers showing improvement in 5-year-old children reaching key developmental milestones in literacy and numeracy
- Percentage of students benefiting from technology-based Mathematics and Science education in targeted areas (Disaggregated by gender)

This project is designed as a first phase engagement in the education sector of Eswatini and as such it puts a strong emphasis on strengthening education service delivery and management systems. To this end, the project aims to put in place the key building blocks that are critical to improve service delivery in ECCDE and basic education as well as to promote accountability for results.

Project Summary

[18] Early years refers to center based ECCDE services and the first three years of primary education. Targeted areas include tinkhundla that have high poverty and a high dropout rate in junior secondary education. A total of 21 target tinkundlas are identified consisting of 12 high priority tinkundlas (with poverty rate ≥40% and junior secondary dropout rate ≥ 15%) and 9 priority tinkundlas (with poverty rate 30-40% and junior secondary dropout rate 10-15%) based on an analysis of annual school census data and household survey data.

The Project has four (4) components and the components will be refined by the MoET during project preparation. The components are outlined in the below.

Component 1: Strengthen coordination and regulation of ECCDE and improve quality of ECCDE services	1.1: Strengthen systems to improve ECCDE service delivery
	1.2: Improve the quality of ECCDE services in targeted centers
Component 2: Improve quality and internal efficiency in basic education	2.1 Improve literacy and numeracy in the early grades
	2.2: Improve the quality of Mathematics and Science instruction in secondary education
	2.3: Improve retention in secondary education
Component 3: Project Management, Capacity Building and Technical Assistance	3.1: Project Management, Capacity Building and Technical Assistance
Component 4: Contingent Emergency Response Component	

2.4.1 Component 1: Strengthening coordination and regulation of Early Childhood Care Development and Education (ECCDE) services and improving access to quality ECDE services

This component aims to strengthen ECCDE service delivery in Eswatini by putting in place the key building blocks that are essential for a well-integrated, multi-sectoral ECCDE system that provides a holistic package of services for children. First, it will strengthen the ECCDE delivery system by improving the quality and utilization of data generated by the system. Second, the project aims to improve the quality of services delivered by a targeted number of ECCDE service providers by supporting the rollout of the new ECCDE curriculum and testing out a model that provides a holistic set of services to children, aligned with minimum norms and standards and involving all relevant sectors. The model which will be tested out in a targeted number of ECCDE centers and all existing Grade 0 classrooms will be used to show how to comprehensively improve ECCDE service delivery and ultimately child development outcomes

2.4.1.1 Sub Component 1.1: System strengthening to improve ECCDE service delivery

The objective of this sub-component is to strengthen the ECCDE delivery system by improving the quality and utilization of data generated by the system. Ultimately, the aim is to improve the monitoring and regulation of all ECCDE providers and strengthen coordination across the sub-sector, and for the MoET and DPMO to ensure that more children are accessing quality ECCDE services. There are two aspects of data system strengthening that will be supported under the project. First, an update of the mapping of all ECCDE providers. Second, the project will support a national, periodic assessment of the quality of ECCDE services and child development and education outcomes. These interventions will seek to build the capacity of the MoET and DPMO to undertake similar data collection initiatives as part of the regular monitoring and evaluation processes embedded in the system.

The MoET, with financing from the GPE and support from UNICEF, is in the process of undertaking a mapping of ECCDE service providers to provide a comprehensive overview of the coverage ECCDE services in Eswatini. The mapping will form the basis for moving towards a systematized process for better monitoring and coordination, where the data can be consolidated into the overall Education Management Information System (EMIS) of the MoET and updated by the MoET every two years through its regular school census process, which is a self-reporting system where school/ECCDE heads provide details on service delivery. However, given the regular turnover of ECCDE service providers in Eswatini, the project will support another physical mapping of ECCDE providers around year 4 of the project. The mapping will focus on what ECCDE services are available in Eswatini and where these services exist. It will seek to collect and update information on, but not limited to, the location, number of children by age category, number of practitioners/ caregivers/ teachers, some details on the learning environment and the types of services offered.

The project will also support the MoET to undertake a more in-depth periodic assessment in a nationally representative sample of ECCDE service providers to understand more about the quality of ECCDE services provided, and early child development and education outcomes. The project will build on existing tools such as the MELQO , focusing on children's learning and development outcomes and the quality of early learning environments, and Teach ECE which monitors improved teacher quality, and develop an assessment tool that can be used for the measurement of ECCDE outcomes in Eswatini. It will also collect information about the resilience of facilities against climate change and related disaster risks, particularly storms and floods. While the project does not support any construction, the data collected through the project will provide the MoET with invaluable information that can be used to plan enhance the climate resilience of ECCDE infrastructure through future rehabilitation and expansion efforts.

2.4.1.2 Subcomponent 1.2: Strengthening the quality of services in targeted centres

This sub-component seeks to support the rollout of the new ECCDE curriculum (Grade 0) in targeted ECCDE centers. Through this intervention, the project aims to achieve two objectives: (i) ensure the provision of high quality ECCDE services in targeted centers, many of which cater to underserved communities; and (ii) in doing so, develop and test an effective model to rollout the new curriculum and provide a holistic package of ECCDE services nationally.

Standard package of support: The standard package of support that will be provided under this sub-component will include the provision of indoor and outdoor materials, in-service teacher training to build teachers/caregivers pedagogical capacity to implement the new curriculum, water tanked to ECCDE centers that do not have access to water, and meals provided to children in targeted ECCDE centers through the expansion of the existing school feeding program.

To support the rollout of the new curriculum in Grade 0 classrooms in government primary schools and ECCDE serving 5-year-old children, the project will finance the printing and dissemination of existing instructional materials, as well as the procurement of additional indoor materials, such as puzzles, blocks, stationery etc. If not available, the project will support the procurement of outdoor equipment such as jungle gyms for the targeted ECCDE centers and Grade 0 classrooms in schools. The project will implement in-service teacher training in targeted centers and schools, which will include the development of teacher training materials and a pilot across a few ECCDE centers and Grade 0 classrooms in schools to refine the training process and materials. In-service training will take place twice under the project, with the initial training of Grade 0 and ECCDE teachers followed by refresher training in later years. This will also be combined with monitoring and supervision visits by inspectors. Many community- based and private ECCDE centers also cater to children under the age of 5 who are not in Grade 0. Currently, there is no standardized curriculum for these younger children, raising concerns about the quality of services they receive. Considering this, the project will finance the development of a standardized curriculum for children between the ages of 3 and 5 years. Training manuals will be developed, piloted, refined and finalized, and training will take place once during the project.

Under this sub-component, and where necessary, the project will finance the procurement of water tanks and support the tanking of water to targeted ECCD centers that do not have piped water. The project will also support the provision of nutritious meals for children in selected centers that are not covered by the school feeding program by collaborating with existing partners such as World Food Program (WFP) and the National Emergency Response Council on HIV/AIDS (NERCHA). In doing so, the project aims to lessen the impact of climate change

on households and communities, especially from the adverse impacts of droughts. Droughts, which are becoming more frequent in the country due to climate change, threaten households' food security and access to clean water, which turn will have detrimental impact on children's overall development and ability to learn. By ensuring that children in rural and disadvantaged communities are receiving nutritious meals and clean water, the project will help reduce the impact of drought and food insecurity on children's growth at a critical stage in their lives.

Targeting: This sub-component will be implemented in 300 ECCDE centres and Grade 0 classrooms that serve poor and rural communities. There are currently 180 Grade 0 classrooms in public primary schools in Eswatini. Priority will be given to ECCDE centers (community and private) that are in targeted tinkhundla (constituencies) that have high poverty and high dropout rates at the secondary level. The final list of ECCDE providers will be determined based on the data from the ongoing mapping exercises.

2.4.2 Component 2: Improving internal efficiency and quality in Basic Education

This component aims to address two priority areas in basic education: (i) improving the quality foundational literacy and numeracy skills in early primary grades as well as Mathematics and Science education in junior secondary education, and (ii) improving student retention through the end of junior secondary education by piloting different interventions in tinkhundla with very high dropout rates.

2.4.2.1 Subcomponent 2.1: Improve literacy and numeracy in the early grades

The main objective of this sub-component is to ensure that all children are acquiring foundational literacy and numeracy skills in early primary grades in targeted areas. To this end, this sub-component will support the effective implementation of the new Competency Based Education (CBE) curriculum in English, siSwati, and Mathematics in Grades 1 to 3 by financing the development and implementation of an Early Grade Reading (EGR) and Early Grade Mathematics (EGM) program that is aligned to the new curriculum. The four core elements of the proposed intervention are: (i) development and provision of materials for teachers and learners, (ii) training and follow-up support for teachers, and (iii) implementing learning assessments. Each of these core areas are discussed in more detail below.

Materials for teachers and learners: The project will finance the development and provision of teaching and learning materials for teachers and learners that are aligned with the new curriculum and complements existing resources, to promote learner-centered teaching practices in early grade reading and mathematics, based on sound pedagogical theory. The MoET has already developed learner books and teacher guides for Mathematics, English and siSwati and there is no imminent need for these materials to be revised. The project will

provide support to ensure that there is a sufficient supply of these materials in classrooms. Moreover, the project will finance the development/adaptation of additional supplementary materials including reading materials, worksheets, remedial and enrichment activities, assessment tools, and detailed guides for teachers on how to support learners and bridge learning gaps. Supplementary reading materials that will be developed under the project will include information on climate change and related topics, in a way that is accessible and engaging to young children, to raise their awareness about the critical climate related issues that affect their environment.

Training and support for teachers: The project will provide in-service teacher training to support the implementation of the new curriculum in classrooms focusing on how to teach foundational skills effectively. With the introduction of the new curriculum, teacher training has largely involved orientation workshops for primary inspectors, In-Service Education and Training (INSET), and subject panel members around the CBE curriculum and half-day orientation workshops for teachers (once a year) to introduce them to the new materials. Complementing this effort, under the project, an enhanced training program will be developed by INSET with technical assistance provided through the project. A core group of master trainers, comprised of experts from INSET, as well as other departments in the MoET such as the National Curriculum Council (NCC) and primary inspectorate will be trained. This core group will then train a larger group of trainers, who will then train and support teachers across zones within regions (clustered training workshops). In addition, the project will support follow-up supervision and in-classroom coaching and mentorship for teachers, with a possible expansion of the current peer-to-peer support model. Principals/head teachers will also be trained around the roll-out of the new curriculum as well as on how to provide follow-up support for teachers.

Assessment: The project will provide support to strengthen the assessment of foundational skills both in a classroom setting and at the system level. First, as part of the in-service teacher training provided under the project, teachers will be trained on how to use formative assessments as an integral part of their classroom instruction, by regularly assessing their students' learning progress, identifying gaps and providing tailored support. Teachers will also be provided with assessment tools for which they have the autonomy to adapt to their classrooms to reduce the burden on them of developing high quality assessments. The project will also finance the development and implementation of standardized national early grade reading and mathematics assessments (EGRA and EGMA) for Grade 3 students which can be undertaken on a periodic basis (every two to three years). The purpose of a standardized national assessment would be to measure gains in foundational skills over time at the system level.

2.4.2.2 Component 2.2: Improve the quality of Mathematics and Science instruction in secondary education

The objective of this sub-component is to improve the quality of Mathematics and Science education in junior secondary schools using an innovative ICT-enabled model i.e., the Progressive Mathematics Initiative (PMI) and Progressive Science Initiative (PSI). In doing so, the project aims to respond to the stark digital divide between children from wealthier and poorer households and from urban and rural communities, which was laid bare during the COVID-19 pandemic. The PSI-PMI model, which was developed by the New Jersey Center for Teaching and Learning (NJCTL), uses digital technology to create a student-centered classroom environment that fosters interactive teaching and learning methods and group discussions. In addition, the program includes extensive online in-service teacher training, which focuses on teachers' Science and Mathematics content and pedagogical knowledge. The model has been successfully implemented in several countries in the region and has shown positive results - both in terms of improved quality of classroom instruction as well as higher levels of student learning.

To help the MoET implement this model, the project will finance the following key areas under this sub-component. As a first step, the project will finance a review of the alignment between the PSI-PMI program and the Eswatini junior secondary Mathematics and Science curriculum and adjust the PSI-PMI program as needed. The adapted program will then be piloted in a sample of schools and evaluated. Building on the pilot and after modifying the intervention based on the findings of the evaluation, the model will be scaled up across all four regions in target schools. As part of the scale-up, all Mathematics and Science teachers in target schools will be trained on the new teaching and learning approach, through a combination of online and face-to-face training with the goal that by the end of the project, all teacher training will be conducted online asynchronously. In addition, classrooms will be equipped with interactive projectors, whiteboards, necessary software, and ancillary equipment. For target schools without electricity, the project will finance the installation of solar panels. In addition, high priority schools will receive tablets for students which will be used to test the differential impact of the model on learning (for students with and without devices).

During the implementation of the online teacher training, teachers' content knowledge and pedagogical skills will be regularly assessed through formative assessments and examinations, which are embedded in the NJCTL's online teacher training courses. To assess the students' learning outcomes, teachers will use the formative assessment tools they will have access to as part of the PSI-PMI program. If students need additional support, teachers will provide remedial materials and support.

By strengthening the use of ICT in teacher training and starting to lay the foundation for e-learning technology to be integrated into basic education service delivery, the project is expected to improve the education system's resilience and ability to tackle disruptive, climate-related shocks (e.g., flooding) in the future by making distance learning technology more accessible. By supporting online in-service teacher training, the project will contribute towards reducing the carbon footprint of in-service teacher training programs, by eliminating the need for extensive travel by teachers and trainers that would have been required for face-to-face in-service training. In addition, climate change related topics will be included as part of the content that will be provided to teachers and students through the PSI-PMI curriculum to build students awareness.

Targeting: Through a phased approach, this intervention will be implemented in 125 junior secondary schools in priority tinkhundla that have high poverty and high dropout rate. In addition, in the 9 high priority tinkhundla (those with very high poverty and dropout rates), 20 junior secondary schools will receive the full package of support including tablets for students to pilot and test the differential impact of the PSI-PMI model on student learning with or without devices for students.

2.4.2.3 Component 2.3: Improve retention in secondary education

The objective of this sub-component is to improve student retention in junior secondary education by strengthening and scaling-up programs that provide support services for adolescent boys and girls to stay in school in targeted areas. In addition, the sub-component will provide support to assess and review key aspects of the OVC education grant program and test out different options to improve its effectiveness in improving retention among poor and vulnerable children. The two areas of intervention under this sub-component are discussed in more detail below:

Strengthening the OVC education grant program: Under this intervention, the project seeks to strengthen the OVC education grant program to address economic barriers that prevent boys and girls from accessing secondary education. The program provides financial support to needy children enrolled in government junior and senior secondary schools. The grants, which are intended to cover tuition and examination costs, are directly paid to schools on behalf of each beneficiary student. While the grant amount for children to attend public schools is standard, school fees are not standardized and vary considerably amongst secondary schools and regions and often the grant amount it not sufficient to cover the direct costs of schooling. This highlights the need to assess the grant amount to ensure the effectiveness of the program to achieve its stated objective of improved educational outcomes. Household survey data and

consultations with the MoET and the DPMO also show that there is room to improve the targeting and reach of the program.

To help the Government strengthen the program and improve its linkage with educational outcomes, especially the retention of students in secondary grades, the project will provide financing and technical assistance to: (i) undertake an initial study that reviews the current targeting, coverage, amount and alignment with school fees, and impact of the OVC education grant and propose relevant changes to strengthen the grant; (ii) pilot and test out different options to improve the effectiveness of the OVC education grant in selected tinkhundla that have some of the highest poverty and dropout rates in the country. The different options that will be tested may include different amounts of the grant, different targeting methods, and different distribution mechanisms; and (iii) based on the findings of the pilot, support the Government to develop a strategy to improve the effectiveness of the program in a sustainable manner and create stronger linkages with educational outcomes. The final design of the pilot will be determined based on the initial study.

The project's objective to improve the targeting and impact of the OVC grant program to ensure that poor households receive support to send their children to secondary school will contribute towards building communities' resilience to the impacts of climate change on human capital formation. By providing support to cover school fees and related costs, the project will reduce the burden on poor household to choose between food and education for their children when faced with climate-related shocks, such as droughts or floods.

Support for girls and boys to stay in school: This intervention will support the MoET to scale-up existing in-school and out-of-school programs that provide different types of support for adolescent boys and girls that have shown promising results, especially in terms of improving access to and retention/re-enrollment in secondary education. The project aims to equip adolescent boys and girls with a wide range of psychosocial skills and relevant knowledge (e.g., communication, assertiveness, self-awareness, information on nutrition, sexual and reproductive health, menstrual health management, and substance abuse related issues) in order to empower them to effectively manage day-to-day life challenges, make informed decisions and successfully transition into adulthood. Through this intervention, the project will tackle issues such as adolescent pregnancy, substance abuse, and other risky behaviours, that are critical factors leading to dropout in Eswatini and have lasting adverse impacts into adulthood. Focus will also be given to raising adolescents' awareness about gender-based violence (GBV) and sexual exploitation and harassment (SEAH) issues and give them information on how to access referral services and programs. In addition, a key element of the life-skills program will be content to raise adolescents' awareness about climate change

and effective actions they can take to build climate resilience and mitigate its impact within their communities.

To implement this intervention, the project will provide support to the MoET first to undertake an initial assessment of existing programs that are being implemented by non-governmental organization (NGOs) in the targeted areas. Based on the findings of the initial assessment, relevant programs with promising results will be selected through a transparent and rigorous approach. Technical and financial support will be provided by the project to help the selected programs/NGOs in collaboration with the MoET to adapt, refine and strengthen their programs, train mentors and educators, and develop the required materials. The project will provide financing to cover operational costs and help scale-up these interventions using both within-school and out-of-school channels including using extra-curricular activities, boys' and girls' clubs and other safe space approaches. In addition, the project will finance an evaluation to assess the effectiveness of these interventions to inform future scale-ups.

This sub-component will be implemented in the 9-high priority tinkhundla (constituencies) that have high poverty and high dropout rates based on an analysis of annual school census data and household survey data.

2.4.3 Component 3: Project Management, Capacity Building and Technical Assistance

The objective of this component is to strengthen key management capacities of the MoET, which is the main implementer of the project, as well as build the capacity of regional and local education offices. The following key areas will be supported under the component.

First the project will strengthen the MoET's capacity to implement the project. The MoET has established the Project Support Unit (PSU) to manage key aspects of project implementation, including in the areas of procurement, financial management, supervision of project activities, M&E, and environmental and social safeguards. The PSU will have a 'hybrid' structure that is comprised of full-time MoET staff seconded to the PSU and consultants (see implementation arrangements for details). The project will finance the hiring of consultants in key technical areas as well as cover selected operating costs related to project management. In addition, the project will finance training for MoET and regional and local education office staff in the areas of M&E, data management and quality assurance and accountability systems. It will also finance study tours for the MoET to learn from countries in the region that have implemented similar interventions successfully

Second, under this component, the project will provide technical assistance to undertake select studies, including (i) an assessment of challenges and opportunities in basic education

to promote inclusive education; and (ii) strategies to integrate digital technology in education service delivery.

Lastly, the project will provide support to the MoET to strengthen citizen-engagement systems to ensure that beneficiaries and stakeholders have a platform to raise their concerns, provide input and enhance accountability for results under the project and in the basic education system more broadly. To this end, the project will finance regular surveys of beneficiaries using locally available technology (phone and SMS based surveys) and provide technical assistance to integrate these surveys into the regular MoET data collection systems.

Component 4: Contingent Emergency Response Component (CERC)

This component is included in accordance with paragraphs 12 and 13 of World Bank Investment Project Financing (IPF) Policy, contingent emergency response through the provision of immediate response to an eligible crisis or emergency, as needed. The component will allow the Government to request from the World Bank rapid reallocation of project funds to respond promptly and effectively to an emergency or crisis. This could be the result of a natural or climate change related disaster or other crisis that have the potential to cause adverse impacts on the education sector. An operational manual for this component will be developed if/when needed. (i) Project Implementing Entity.

The Project will be implemented under the leadership of the MoET, which would be acting as the Loan implementing agency.

Head of the Project. The Principal Secretary (PS) MoET, will be acting, on behalf of the Minister of MoET, as the Head of the Project, providing the Project's required strategic and political vision and being responsible for the overall leadership, coordination and management of the Project.

The Director of Education (DoE) MoET, accountable to the PS MoET, would be responsible for the day-to-day overall coordinating effort required for the implementation of the Project's sub-components. The DoE will carry out this coordination effort under the strategic and political guidance provided by the PS, and in line with the implementation lead given by the heads of the different units within MoET entrusted with the responsibility of executing the various interventions comprised in Components 1 and 2.

The mission agreed on a much simpler implementation arrangements based on the principle of having: (i) each Project sub-component or set of sub-components coordinated and managed by one authority within MoET; and (ii) three Technical Working Groups, accountable to the head of the corresponding sub-component or set of sub-components and comprised by

representatives of all the different implementing entities participating in the corresponding sub-component, addressing the field implementation issues in an articulated and holistic fashion.

(iii) Support to the MoET in managing the Project. The mission agreed with the MoET's proposal of establishing a Project Support Unit (PSU), conceived as a dedicated project management structure housed within MoET for ownership and effective coordination, aiming at supporting the DoE carrying out his/her daily management, coordination, safeguards and fiduciary tasks.

The institutional arrangements of the project will be as follows;

- The project will be led by the PS of the MoET.
- The Director of Education will Head the project at Ministry level and will be supported by Planning Unit staff.
- The Head of the Project will liaise with the Project Support Unit (PSU) which will be housed within the MoET for ownership and effective coordination.
- The PSU will be a dedicated unit project management structure with experienced officers seconded from the relevant departments for capacity building, continuity and sustainability of efforts beyond the project.
- A dedicated unit is the most preferred option considering the risk rating of the project (system capacities) which may result in delays in project implementation. It is also the most appropriate option because the project involves a number of implementing entities some of which are outside the MoET hence it will be important to ensure transparency or high-quality tendering, contracting, contract enforcement/management and M&E skills.
- The PSU will have a full-time project coordinator and technical support staff in administration, procurement, financial management, environmental and social safeguards, and monitoring and evaluation (M&E).
- MoET departments will be responsible for implementation of components and sub-components that fall within their mandates and will be supported by staff working in the PSU.
- The PSU will be responsible for day-to-day coordination of project activities and will report to the Head of the Project, the Director of Education and the Principal Secretary (who is responsible for ensuring close collaboration with other MoET departments at the central and regional levels).
- The MoET through the PSU will take the lead in financial management and environmental and social safeguards issues for the entire project. It will be responsible

for procurement under the project for all components, and the submission of financial reports on a quarterly basis which covers the entire project.

- The Ministry's Financial Controller working with the Head of the Project will oversee the financial management and project management on the government side.
- Donor coordination will be facilitated through the existing Local Education Group.

Structure of the PSU

Central institutional implementation arrangements

The key implementing players at the central level are:

Head of the Project. The Principal Secretary (PS) of the MoET, will be acting, on behalf of the Minister of MoET, as the Head of the Project, providing the Project's required overall leadership and will be accountable for the project performance. In this capacity, the PS MoET will ensure that the implementation of the Project is carried out in strict alignment with the Project's Financial Agreement (FA) and Project's Operational Manual (POM) and will, to the best of his/her abilities, warrant that the Project's Developmental Objectives (PDOs), intermediate and final targets, as fully described in the Project's Results Framework (RF) and Monitoring Matrix, are achieved. The PS MoET will be accountable to the Minister MoET on matters related to the Project's implementation process.

Director of Education. The Director of Education, accountable to the PS of the MoET, would be responsible the overall coordinating effort required for the implementation of the Project's sub-components. The Director will carry out this coordination effort under the strategic and political guidance provided by the PS, and in line with the implementation lead given by the heads of the different units within the MoET entrusted with the responsibility of executing the various interventions. The Director will be supported by the project manager under the PSY in

the day-to-day management and coordination of the project. Accordingly, the Director of Education will provide overall coordination of Project activities, comprising:

- Communication with MoET's implementation entities and directorates including horizontal and vertical articulation with the institutional and regional levels; and
- Supporting the various MoET's implementation entities.
- Organizing monthly internal performance review meeting

The Director would delegate the day-to-day management of the Project to the following entities:

d) The Chief Inspector Primary Education/ECCD for sub-components 1.1 and 1.2;

e) The Chief Inspector Primary Education for sub-component 2.1; and

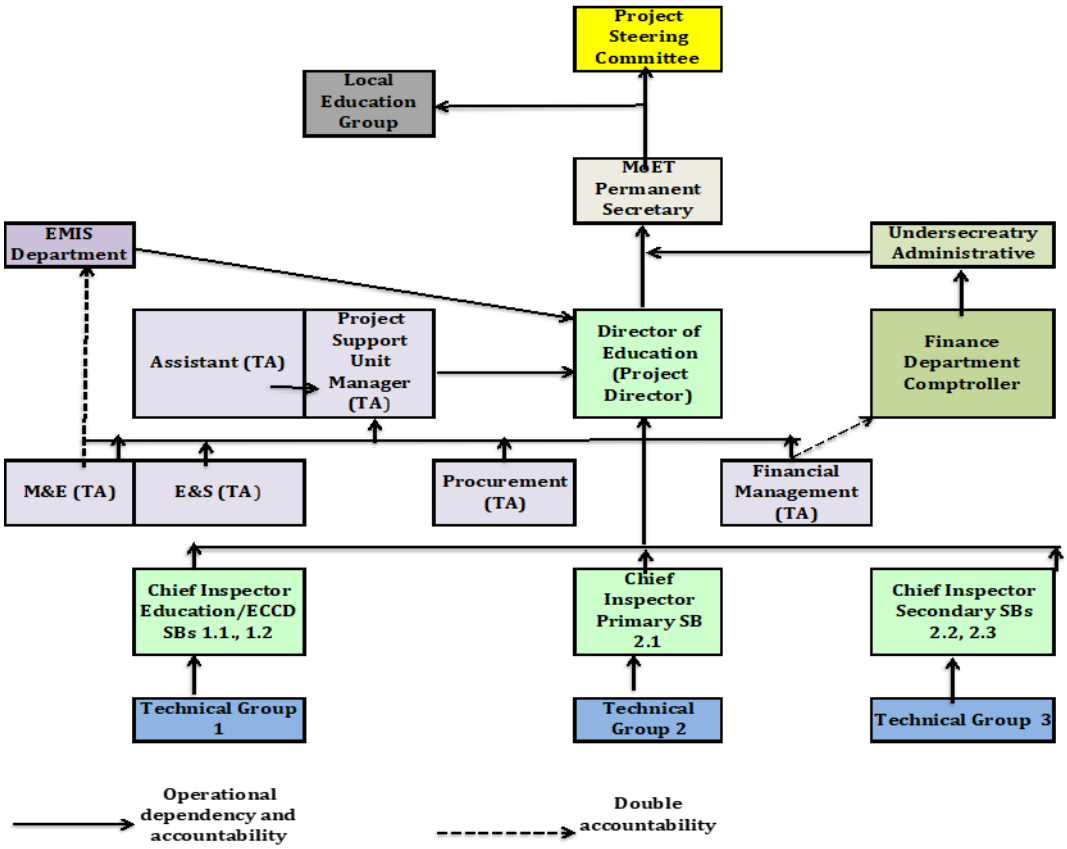
f) The Chief Inspector Secondary Education for sub-component 2.2 and 2.3.

Project Steering Committee (PSC): The PSC has been conceived as an inter-ministerial and inter-agency body aimed at guiding the implementation of the Project and promoting coordination and articulation at the highest decision-making level between all components and sub-components and all the key implementing stakeholders to ensure that all the functional elements of the Project are well synchronized. The PSC will, inter-alia: (a) provide overall policy guidance to the Project implementation process; (b) approve the Project's Annual Work and Procurement Plans and proposed budget; (c) review and endorse the annual project progress reports including the external audit; and (d) discuss and resolve critical implementation issues which may arise and that may affect the Project implementation process and/or hinder achievement of the PDOs and intermediate and finale targets. The PSC will carry out bi-annual program reviews or with any other frequency as needed and assess performance, potential challenges that could be anticipated early and craft preventive and/or corrective strategies where and when necessary, to incorporate lessons learned on the ground. The PSC will be chaired by the PS of the MoET and will be comprised of various agencies including the DPMO, MoH, Ministry of Tinkhundla, NERCHA and others. The Director of Education in the MoET, supported by the PSU manager, will act as the secretary of the PSC.

Local Education Group (LEG): To further support the coordination and monitoring of the project, the project will use the LEG, which is an ongoing collaborative forum of stakeholders within the education sector led by the national government and comprises government ministries, development partners, civil society organizations and teacher's formations.

Quarterly LEG meetings chaired by the PS MoET will be used to regularly take stock of the project progress.

Technical working groups: Three technical working groups will be established to support the day-to-day implementation of the project sub-components and provide the appropriate collaborative forum to address and solve specific implementation issues.



The following Government entities will be entrusted with the implementation of the various components and sub-components of the Project as follows:

Component 1: Strengthening coordination and regulation of ECCDE and improving access to quality ECCDE services.

The Chief Inspector Primary Education/ECCD in the MoET will be responsible for the overall coordination of this component including its two sub-components. In implementing this component, the MoET will be supported by the National Children's Coordination unit in the Deputy Prime Minister's Office (DPMO). Other Ministries and agencies that will support the MoET to implement activities under this component are: Ministry of Health (MoH), Ministry of Tinkundla, National Emergency Response Council on HIV/AIDS (NERCHA), and World Food Program (WFP). Other entities involved in supporting child services more indirectly include the Ministry of Natural Resources and Energy (water supply in rural schools and electricity

connections to schools), the Eswatini Water Services Corporation (water and sanitation services in urban and peri -urban schools), the Ministry of Justice (child protection services) and the Ministry of Home Affairs (Child registration and identification).

This component will have one technical working group led by the Chief Inspector for Primary Education in the MoET and will include members from all relevant implementing entities. This technical working group is chaired by the Chief Inspector for Primary Education who is also responsible for ECCDE.

Component 2: Improving internal efficiency and quality in Basic Education

The MoET through its various inspectorates will be responsible for leading and coordinating this component since all the interventions are targeted at primary and secondary schools. Accordingly, the Chief Inspector for Primary Education will be responsible for the implementation of sub-component 2.1 while the Chief Inspector for Secondary Education will be responsible for sub-components 2.2 and 2.3.

Other entities that will be involved in the implementation of this component are: the Deputy Prime Minister's Office for the strengthening the OVC grant; the MoH (life-skills programs in schools, mental health services for children/youth, substance abuse services for youth); the Ministry of Tinkhundla and existing NGOs supporting Adolescent Youth Clubs inside schools and communities; the Ministry of ICT and the Ministry of Natural Resources and Energy (water, electricity and internet connections for secondary schools, access to bulk purchase of laptops and other ICT goods).

There are three sub-components under this component, that will be supported by two technical working groups. The first technical working group corresponding to sub-component 2.1 will focus on early grade literacy and numeracy, and it will include representatives from the Primary Education Inspectorate Department, National Curriculum Council (NCC) and In-service education and training (INSET) and will be chaired by the Chief Inspector for Primary Education, who will also chair the technical working group for sub-component 2.1. This approach is expected to facilitate continuity in the project's intervention on foundational skills both at the ECCDE and primary level.

The second technical working group corresponding to sub-components 2.2 and 2.3 will support interventions at the junior secondary level. The working group will include representatives from the Secondary Education Inspectorate Department, INSET, NCC, UNESWA in-service department, Education Testing Guidance and Psychological Services, Social Welfare - OVC unit within DPMO, ICT inspectorate, and Implementing Partners (NGOs) and will be chaired by the Chief Inspector for Secondary.

The National Curriculum Center (NCC) will participate in: (i) the finalization and implementation of the Grade 0 curriculum and the development and implementation of Grade 00 (for 4-5 year old) and 000 (for 3-4 year-old children) curriculum under sub-component 1.3; (ii) the development of training manuals/modules for teachers in English, Siswati and Mathematics in the early grades (1 to 3) and other related interventions under sub-component 2.1; and (iii) the review of secondary education mathematics and science curriculum content with the intention of integrating ICT use in the teaching and learning process.

The PSU, housed in the MoET will be responsible for the following day-to-day functions:

- Managing the project by ensuring fiduciary compliance in strict adherence to the FA and the POM as it concerns financial management, procurement, monitoring and social and environmental safeguards as well as the effective and timely carrying out of the grievance redress mechanism;
- Ensuring the carrying out of the required reporting as stipulated in the FA and the POM and periodic updating of the Results Framework;
- Ensuring the carrying out supervision and monitoring of project activities as stipulated in the FA and the POM;
- Ensuring the timely contracting of the TA to carry out the required surveys, impact evaluations and other related studies;
- Ensuring the preparation of the PAWPP; and
- Updating of the POM as needed in consultation with the World Bank

The PSU will be composed of five full-time MoET staff would be seconded to the Project: (i) one Financial Officer; (ii) one Procurement Officer; (iii) one Monitoring and Evaluation (M&E) Officer; (iv) one Environmental and Social (E&S) Safeguard Officer; and (v) one Administrative Assistant. These seconded staff would be supported by consultants working full-time on the Project for the entire duration of the Project in the following roles: (i) one Project Manager; (ii) one Financial Management Specialist; (iii) one Procurement Specialist; (iv) one M&E Specialist; and (v) one E&S Specialist. The detailed roles, responsibilities and attribution of this PSU staff will be described in more detail in the POM.

To ensure institutional ownership in the management of this project, it has been agreed that: (i) the financing officer at the PSU will also be accountable to the Financial Controller of the MoET, who will be the highest Ministerial authority managing the project's designated account; and (ii) the monitoring and evaluation officer at the PSU will also be accountable to the Head of EMIS in the MoET.

Regional institutional implementation arrangements

The four Regional Education Offices (REO) of the MoET in Hhohho, Manzini, Shiselweni and Lubombo will provide, through their cadre of school inspectors, the required vertical articulation (link), oversight and reporting between the central/national authorities, regional/district authorities, and the participating primary, junior secondary and ECCDE centers and services.

Local/institutional (school) level implementation arrangements

At the local level:

- The selected ECCDE centers and services will participate in the implementation of sub-components 1.1, and 1.2.
- The selected primary schools will participate in the implementation of sub-component 2.1; and
- The selected junior secondary schools will participate in the implementation of sub-component 2.2 and 2.3.

ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

Project activities:

- System strengthening to improve ECDE service delivery.
- Strengthen the quality of ECDE services in targeted centres
- Improve literacy and numeracy in the early grades
- Support ICT enabled teaching in Mathematics and Science in junior secondary
- Improve retention in secondary education
- Project Management, Capacity building and technical assistance

Key labour risks: Therefore, labour risks expected are minimum and can be controlled and overcome easily and smoothly. However, below is a list of possible risks that may arise in this project:

1. The conduct of hazardous work, such as the use of hazardous waste, mainly electronic waste
2. Likely incidents of child labour or forced labour
3. Possible accidents or emergencies (transporting equipment and materials to sites, servicing equipment, flooding from accidental water spillages and leaking equipment)
4. Absence/lack of insurance to project workers, site equipment and machinery and 3rd parties.

The MoET has developed this LWMP as part of the ESMF which will illustrate the types of workers to be engaged and their management in line with ESS2 and national laws and regulations. Even though labour influx is not anticipated, social impacts such as GBV, sexual exploitation and communicable diseases for local communities cannot be ruled out.

The ESMF will include labour related clauses, GBV risk management measures and preventive measures. The contractors' contracts will include specific clauses prioritizing recruitment of unskilled local labour and will take into account social and environmental mitigation measures.

Community Health and Safety: while the anticipated renovation works has a small foot print, the MoET will consider the incremental risks of the public's health and safety and potential exposure to operational accidents. As there might be minimal renovations works, labour influx is not anticipated, the project ESMF as well as the LWMP includes clauses to avoid, minimize, manage and mitigate any Sexual Exploitation Assault (SEA) and GBV risks. Additionally, the MoET recognizes its responsibility to monitor Gender Based Violence/ Sexual Exploitation Abuse risk throughout the project.

The MoET has developed this LWMP as part of the ESMF which will illustrate the types of workers to be engaged and their management in line with ESS2 and national laws and regulations. Even though labour influx is not anticipated, social impacts such as GBV, sexual exploitation and communicable diseases for local communities cannot be ruled out.

The ESMF will include labour related clauses, GBV risk management measures and preventive measures. The contractors' contracts will include specific clauses prioritizing recruitment of unskilled local labour and will take into account social and environmental mitigation measures. Any civil works contracts will include the Environment, Health and Safety Guidelines (EHSGs).

The ESMF and its associated SEP will provide guidance on how impacts on the community will be managed. While renovation works will take place in an existing footprint, the MoET will pursue preventative safety measures through risk assessment and strive to reduce occupational accidents on a continual basis.

Labour Influx: The project footprint is relatively small and not likely to engage a significant amount of labour. The majority of labour will be already existing education workers with the exception of skilled local contract workers who might be required to supply and maintain ICT equipment. Hence, labour camps are not anticipated. The Eswatini Ministry of Education's existing operational procedure is to mandate and localize the economic benefits and only allow for outside, including expatriate labour where there is a requirement for special skills, external

workers, which will be few in number, will be accommodated at existing housing in the area which has been prior practice by the Eswatini Ministry of Education in similar projects.

OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

There are three main pieces of legislation in Eswatini which regulate the terms and conditions of employment, namely: The employment Act 5, 1980; The Industrial Relations Act 2000; and the Wages Act 16, 1964. For all civil servants, the code of conduct is enshrined in the Eswatini General Orders of April 1973, the Civil Service regulations Act, Occupational Health and Safety Act of 2001, Public Service Act 1963 and the Public Health Act of 1969.

The Employment Act provides for the basic conditions of employment with a view of improving the status of employees in Eswatini. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating hours of work, wages, leave entitlements, job descriptions, grievance procedure, benefits if any, etc. it further mandates the Ministry responsible to issue Wage Regulations on a regular basis which deal with worker's terms and conditions for each particular industry. It is in this legislation where you will find provisions regulating;

a) Contracts of employment
b) Leave entitlements, i.e., annual leave, sick leave, maternity leave and compassionate leave
c) The protection of wages (prohibition against unlawful deductions)
d) Retrenchment procedures
e) Fair and unfair reasons for termination of employment

The Industrial Relations Act 2000 is the main Act which provides for the collective negotiation of terms and conditions of employment in the workplace (i.e., negotiations between employers and trade unions, and the dispute resolution mechanism) there are three specialized forums for dealing specifically with labour issues in Eswatini: The conciliation Mediation and Arbitration Commission (CMAC), The Industrial Court and the Industrial Court of Appeal.

The Wages Act 16, 1980, deals specifically with the minimum wages and basic terms and conditions of employment in virtually all sections of economic activity in Eswatini, be it in retail, manufacturing, agriculture or building and construction industry.

Eswatini Ministry of Education requires contractors to comply with the most current Wages Regulations Order for Building and Construction as issued by the Minister from time to time.

The Public Service Act of 1963 (part V) deals with all disciplinary control and proceedings for Civil Servants. The Public Health Act, 1969 provides for the establishment of processes to

ensure public health at all phases of a project. It also provides for steps to take should there be any incident from the project affecting the public and slays out responsibilities for actions to be taken. The Occupational Health and Safety Act 2001, is an Act to provide for the safety and health of persons at work and at the workplace and for the protection of persons other than persons at the workplace against hazards to safety and health arising out of or in connection with the activities of person in the workplace and to workplace and to provide for other matters incidental thereto.

OVERVIEW OF LABOUR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Occupational Health and Safety Act 9, 2001 provides for the safety and health of persons at work and at the workplace and for the protection of persons other than persons at the workplace against hazards to safety and health arising out of, or in connection with, the activities of persons in the workplace and to workplace and to provide for matters incidental thereto. This Act obligates the employer to ensure the safety and health of all its employees, and also to mitigate risks of exposure to any hazards in the workplace. The legislation makes it mandatory for employers to provide personal protective clothing or equipment to employees exposed to wet, dusty, noisy or any conditions that might expose the employees to harsh or dangerous conditions. Employees are to be trained to perform their work in order to avoid exposure to dangerous conditions. Employees are to be trained to perform their work in order to avoid exposure to danger or injury and to be informed of any known hazards or diseases. The Eswatini Ministry of Education and Training is committed to:

1. Complying with legislation and other applicable requirements which relate to the company's occupational health and safety hazards.
2. Enabling active participation in OH&S risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
3. Continually improving the OH&S management system and performance.
4. Communicating this policy statement to all persons working under the control of Eswatini Ministry of Education and Training with emphasis on individual OH&S responsibilities.
5. Availing this policy statement to all interested parties at all MoET facilities and sites.
6. Availing this policy statement to all interested parties at all MoET facilities and sites.

Under current Occupational Health and Safety Act (2001), any contractor is required to have at least one Safety, Health and Environmental Representative for the workplace or a section

of the workplace for an agreed period in accordance with Section 14 of the Eswatini Occupational Safety and Health Act (2001). At a minimum, the Representative must:

a. Identify potential hazards;

b. In collaboration with the employer, investigate the cause of accidents at the workplace;

c. Inspect the workplace including plant, machinery, substance with a view to ascertaining the safety and health of employees provided that the employer is informed about the purpose of the inspection;

d. Accompany an inspector whilst that inspector is carrying out the inspector's duties in the workplace;

e. Attend meetings of the safety and health committee to which that safety and health representative is a member;

f. Subject to (g), make recommendations to the employer in respect of safety and health matters affecting employees, through a safety and health committee; and

g. Where there is no safety and health committee, the safety and health representatives shall make recommendations directly to the employer in respect of any safety and health matters affecting the employees.

Eswatini Ministry of Education and Training further has specific requirements related to first aid provisions and in accordance with these provisions and to avoid work related accidents and injuries, the contractor will:

a) Provide occupational health and safety training to all employees involved in works;

b) Provide protective masks, helmet, overall and safety shoes, and safety goggles, as appropriate;

c) Provide workers in high noise areas with earplugs or earmuffs;

d) Ensure availability of first aid box;

e) Provide employees with access to toilets and potable drinking water;

f) Provide safety and occupational safety measures to workers with Personal Protection Equipment (PPE) when installing pumps to prevent accidents during replacement and installations and follow safety measures in installing submersible pump and cleaning the riser pipes;

g) Properly dispose of solid waste at designated permitted sites at the landfill allocated by the local authorities and cleaning funds; and attach the receipt of waste form the relevant landfill authority;

h) Carry out all procedures to prevent leakage of generator oil into the site;

i) Ensure that the head of the well is covered tightly; and

j) Provide secondary tank for oil and grease to avoid spills.

Further to enforcing the compliance of environmental management, contractors are responsible and liable of safety of site equipment, labours and daily workers attending to the construction site and safety of citizens for each subproject with the work they d

RESPONSIBLE STAFF AND PROCEDURES

The Eswatini Ministry of Education and Training has the overall responsibility to oversee all aspects of the implementation of the Labour and Worker Management Procedure, in particular to ensure contractor compliance. The MoET will address all LWMP aspects as of procurement for works as well as during contractor induction. The contractor is subsequently responsible for management of labour issues in accordance with contract specific labour management plans, implementation of which will be supervised by the MoET on a monthly basis or at shorter intervals as defined by specific plans. The detailed approach is described in the following sections.

Education Worker Occupational Health and Safety. The Ministry must deploy environmental health officers that will ensure occupational and safety requirements are implemented in schools, education training centres, neighbouring care points and other education related sites. The education facilities must formulate comprehensive OHS programs, establish safety representatives for day-to-day monitoring of safety requirements, recording and reporting all incidents accordingly to the Ministry.

Education Worker and Labour Conditions. Government civil servants, who may provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement.

Contractors' Occupational Health and Safety. Contractors must engage a minimum of one safety representative. The safety representative ensures day-to-day compliance with specified safety measures and records of any incidents. Minor and serious incidents are reported to the Eswatini Ministry of Education and Training immediately. Minor incidents will be reflected in

the quarterly reports to the World Bank; major issues are flagged to the World Bank immediately.

Contractor Labour and Working Conditions. Contractors will keep records in accordance with specifications set out in this LWMP. The Eswatini Ministry of Education and Training may at any time require records to ensure that labour conditions are met. The Project Management Unit will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Worker Grievances. The Eswatini Ministry of Education and Training procedures currently in place will remain for project staff. Contractors will be required to present a worker grievance redress mechanism which responds to the minimum requirements in this LWMP. The Project Management Unit's Social Officer will review records on a monthly basis. Where worker concerns are not resolved, the national system will be used to set out in the section, but the Project Management Unit will keep abreast of resolutions and reflect them in quarterly reports to the World Bank.

Additional Training. Contractors are required to, at all times, have a qualified safety officer on board. If training is required, this will be the contractor's responsibility. The safety officer will provide instructions to contractor staff. The Eswatini Ministry of Education and Training will procure for training to address risks associated with influx and will provide a schedule for training required. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required by Eswatini Ministry Education and Training, as specified by the contract.

POLICIES AND PROCEDURES

As mentioned above, all the renovation and rehabilitation work in this project shall not exceed 4 months at each site. Therefore, labour risks are expected to be minimum; and can be controlled and overcome easily and smoothly.

Below is a brief summary of measures that can be followed to address and overcome the labour risks that may appear while implementing works within this project.

Most environmental and social impacts of subprojects resulting from activities directly under the control of contractors will be mitigated directly by the same contractors. As a consequence, ensuring that contractors effectively mitigate project activities related impacts is the core of the Project's approach. The Eswatini Ministry of Education and Training will incorporate standardized environmental and social clauses in the tender and contract documents in order for potential bidders to be aware of environmental and social performance requirements that

will be expected from them and are able to reflect that in their bids and required to implement the clauses for the duration of the contract. The Eswatini Ministry of Education and Training will enforce compliance by contractors with these clauses.

As a core contractual requirement, the contractor is required to ensure all documentation related to environmental and social management, including the LWMP, is available for inspection at any time by the Eswatini Ministry of Education and Training or Eswatini Ministry of Education and Training appointed agents. The contractual arrangements with each project worker must be clearly defined in accordance with Eswatini Law. A full set of contractual requirements related to environmental and social risk impact management will be provided in the Project's Environmental and Social Impact Assessment. All environmental and social requirements will be included in the bidding documents and contracts in addition to any additional clauses, which are contained, in the Project's environmental and social instruments.

Under no circumstances will the Ministry, Contractors, suppliers or sub-contractors engage forced labour. Forced labour includes bonded labour, excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment within their legal rights substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

Labour influx and gender-based violence. Contractors will need to maintain labour relations with local communities through a code of conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behaviour. The CoC must include sanctions for noncompliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC should be written in plain language and signed by each worker to indicate that they have:

1) Received a copy of the CoC as part of their contract;
2) Had the CoC explained to them as part of induction process;
3) Acknowledge that adherence to this CoC is a mandatory condition of employment; and
4) Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in English and Siswati. Contractors must address the risk of gender-based violence, through:

1) Mandatory training and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated;

2) Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;

3) Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence; and

4) Developing a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.

This process will be under the portfolio of the Social Standards Officer to be recruited under the PSU and shall identify and engage the relevant stakeholders on GBV and HIV and AIDS related issues.

AGE OF EMPLOYMENT

The Country ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182) in 2002. It also signed the African Charter on the Rights and Welfare of the Child in 1992 but has not yet ratified it. Section 97 of the Employment Act applies minimum age protections to children working in domestic and agricultural work. Similarly, Section 246 of the Children's Protection and Welfare Act 6, 2012 prohibits hazardous work for children under the age of 18 in industrial undertakings, including in mining, manufacturing, and electrical work. The minimum age of employment for this project shall be 18 years and to ensure compliance, all employees will be required to produce National Identification Cards as proof of their identity and age which is the national identification document required for employment. If any contractor employs a person under the age of 18 years, that contractor will not only be terminated by Eswatini Ministry of Education and Training but also be reported to the authorities. Section 248 of the Children's Protection and Welfare Act states that any person who employs under age children will be liable on conviction to a minimum fine of E100, 000.00- or 5-years' imprisonment or both for a first offender. For a second offender, it is imprisonment of not less than 10 years.

TERMS AND CONDITIONS

As stated above, the terms and conditions of employment in Eswatini are governed by provisions of The Employment Act 5, 1980. Section 22 of the Act makes it mandatory for employers to give its employees a copy of the written particulars of employment, signed by both parties within six weeks of employment. This requirement however is not applicable to employees engaged for a fixed period of less than six weeks or anyone expected to work less than 21 hours per week. For this project, contractors will be required to provide all its employees with written particular of employment, including those excluded by the provision of S.22 and casual employees.

Contractors will also be required to comply with the most current Regulation of Wages Order for the Building and Construction Industry which is issued by the Government and reviewed on a regular basis. The Wages Order specifies the minimum wages, hours of work, overtime pay, leave entitlements, travelling and subsistence allowances, and the issue of protective clothing.

Section 136 of the Act states that before a contractor is awarded a public contract, that contractor is required to certify in writing that the wages, hour and conditions of work or persons to be employed by him on the contract are not less favourable than those contained in the most current wages regulation issued by the Labour Commissioner. Where a contractor fails to comply with this requirement, Section 143 states that the contract with the contractor may be withdrawn as an approved contractor upon recommendations of the Labour Commissioner. In ensuring full compliance with the law in this regard, contractors will be required to furnish the Eswatini Ministry of Education and Training with copies of the Written Particulars of Employment or copies of the contract of all its workforce. Contractors will not be allowed to deploy any employee to work in the project if such copy of employment of that employee has not been given to the Eswatini Ministry of Education and Training.

As a monitoring mechanism, Section 139 of the Act provides that a contractor shall not be entitled to any payment unless he has filed, together with his claim for payment, a certificate: a) stating whether any wages due to employees are in arrears; b) stating that all employment conditions of the contract are being complied with. Section 141 authorizes the office of the Labour Commissioner to intervene if the contractor defaults in the payment of wages due to any of its employees by arranging for the payment of the wages to the employee out of the sum payable to the contractor. However, for this project, it will be a material term of the contract to allow the Eswatini Ministry of Education and Training to withhold payment from the contractor should the contractor not fulfil their payment obligation to their workers.

Worker's Organization

The country has ratified the numerous ILO Conventions aimed at ensuring that member states protect the notion of collective bargaining. These Conventions include: ILO Convention 87 on Freedom of Association and Protection of the Right to Organize and ILO Convention 98 on the Right to Organize and Collective Bargaining. Section 32 (2) of The Constitution of Swaziland, 2005 on the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation. The Industrial Relations Act 2000 (as amended) was 90 enacted to give effect to the collective bargaining, amongst other purposes. Section 4 (c) to (e) of the act allows for the collective negotiation of terms and conditions of employment. The MoET provides employees with the right to join and form an organization for purpose of labour representation.

DISCIPLINARY PROCEDURES AND GRIEVANCE MECHANISM

In any working environment it is essential for both employers and employees to be fully conversant with all aspects of disciplinary processes, the grievance handling procedures and the legal requirements and rights involved. In implementing an effective dispute management system consideration must be given to the disputes resulting from the following:

1. Disciplinary action
2. Individual grievances
3. Collective grievances and negotiation of collective grievances
4. Gender-based violence, sexual exploitation and workplace sexual harassment

Disciplinary Procedure. The starting point for all disciplinary action is rules. These rules may be implied or explicit and will vary from workplace to workplace. Some rules are implied in the contract of employment (e.g., rule against stealing from the employer), however it is advisable that even implied rules be included in the disciplinary code or schedule of offences. In an organized workplace these rules ideally are negotiated with the trade union and are often included in the Recognition Agreements signed by the employer and trade union.

In terms of Clause 6 of the Code of Good Practice: Termination of Employment, these workplace rules must be:

1. Valid or reasonable;
2. Clear and unambiguous;

3. The employee is aware, or could reasonably be aware of the rule or standard; and
4. The procedure to be applied in the event the employee contravenes any of these rules.

The Code of Good Practice: Resolution of Disputes at the Workplace which, in terms of S.109 of The Industrial Relations Act 2000 (as amended) at Clause 4.2, requires employers to establish a fair and effective disciplinary procedure in the workplace, which should be in line with Clause 11 (Fair Procedure). The procedure is as follows:

1. Conduct an investigation to determine whether there are grounds for a hearing to be held;
2. If a hearing is to be held, the employer is to notify the employee of the allegations using a form and language that the employee can understand;
3. The employee is to be given reasonable time to prepare for the hearing and to be represented by a fellow employee or a union representative;
4. The employee must be given an opportunity to respond to the allegations, question the witnesses of the employer and to lead witnesses;
5. If an employee fails to attend the hearing the employer may proceed with the hearing in the absence of the employee;
6. The hearing must be held and concluded within a reasonable time and is to be chaired by an impartial representative; and
7. If an employee is dismissed, he/she must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal to the Conciliation, Mediation and Arbitration Commission (CMAC).

Therefore, it is incumbent upon the Contractors to ensure that they have a disciplinary procedure and Code and standards which the employees are aware of. Each contractor will be required to produce this procedure to ensure that employees are not treated unfairly.

Individual Grievance Procedure. Clause 4.3 of the Code of Good Practice: Termination of Employment requires every employer, including contractors, to have a Formal Grievance Procedure which should be known and explained to the employee.

The Code recommends that such procedure should at least:

1. Specify to whom the employee should lodge the grievance;
2. Refer to time frames to allow the grievance to be dealt with expeditiously;

3. Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level; and

4. If a grievance is not resolved the employee has the right to lodge a dispute with CMAC. All the contractors who will be engaged for the project will be required to produce their grievance procedure as a requirement for tender which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, is confidential, adheres to non-retribution practices and includes the right to representation. After they are engaged, they will be required to produce proof that each employee has been inducted and signed that they have been inducted on the procedure.

Collective Grievances and Disputes Resulting from the Negotiations of Collective Agreements. Where a trade union is recognized, it is entitled to negotiate on a regular basis with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with it. The procedures followed in such instances is usually contained in the Recognition Agreement, which states how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiation and the procedure to deal with issues that are not resolved through consensus. Clauses 4.4 and 4.5 of the Code deals with the handling of collective grievances as raised by the employees.

In the type of disputes, if the dispute is not resolved at the workplace, the parties to the dispute can utilize the dispute resolutions mechanisms provided for in the labour legislation.

For civil servants, the Public Service Act of 1963 (Part V (B)) which deals with disciplinary proceedings is also included.

Gender-based Violence, Sexual Exploitation and Workplace Sexual Harassment. Violence and harassment in the work world deprives people of their dignity, is incompatible with decent work, and a threat to equal opportunities and to safe, healthy, and productive working environments. It remains a widespread phenomenon, present in all countries and disregarding sectors, occupations and workplace arrangements. Convention No. 190 and Recommendation No. 206 recognizes the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment.

Contractor Management

The Eswatini Ministry Education and Training requires that contractors monitor, keep records and report on terms and conditions related to labour management. The contractor must provide workers with evidence of all payments made, including social security benefits, pension contributions or other entitlements regardless of the worker being engaged on a fixed

term contract, full-time, part-time or temporarily. The application of this requirement will be proportionate to the activities and to the size of the contract, in a manner acceptable to the Eswatini Ministry of Education and Training and the World Bank:

A. **Labour conditions**: records of workers engaged under the Project, including contracts, registry of induction of workers including CoC hours worked, remuneration and deductions (including overtime), collective bargaining agreements.

B. **Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and 93 preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).

C. **Workers:** number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).

D. **Training/induction:** dates, number of trainees, and topics.

E. **Details of any security risks:** details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project.

F. **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

Every Safety File is 'site-specific'. It will be compiled following the client's and the site's safety specifications. The overall information requirements remain the same, and the site-specific documents will be added. When Health and Safety File is set up, it will consist of the following Documents:

- Contractor appointment letter.
- Construction Regulation 5(3)(f) of the OHS A) 37(2) Agreement between client and contractor
- Notification of Construction Work
- Copy of the OHS Act
- Occupational Health and Safety Management Plan
- Company Occupational Health and Safety Policy
- Letter of Good Standing
- Material Safety Data Sheets for hazardous materials used (if required)

- Tax Clearance Certificate
- Risk Assessments
- Safe work procedures (Site Specific)
- Fall Protection Plan (if required)
- Legal appointment with proof of training (Ex. Chief Executive Officer, Risk Assessor, First Aider, etc.)
- Incident Reporting Procedures
- Incident Reports (General Administrative Regulation 9 (3) – Annexure 1)
- Incident Registers
- Reports of Accidents
- Emergency Preparedness Documents
- First Aid Documents
- Induction Records
- Medical Surveillance Records
- Safety Communication (e.g., Toolbox talks)
- Minutes of Safety Meetings
- Inspection Registers

Community Workers

The project will not engage community workers. Community workers are not currently used by the Eswatini Ministry of Education and Training in any projects due to the specialized labour needs required.

Primary Supply Workers

This section addresses labour management risks associated with people employed or engaged by Eswatini Ministry of primary Education suppliers. Primary suppliers are suppliers who, on an on-going basis, provide goods or materials directly to the Project.

The project will require procurement of a substantial number of materials, include protection and control equipment, power-poles, steel products, etc. The risk associated with primary supply associated with the project is assessed below. All primary suppliers are formal businesses who are required to procure and produce materials subject to high standards**.**

Appendix 1: Comparative Table of ESF and National Objectives and Requirements

ESF Objectives	National Requirements	Recommended Actions
ESS2 Labour and Working Conditions		
To provide every employee with written particulars of employment.	**The Employment Act 5, 1980** **S.22 –** makes it mandatory for the employer to give each of its employees a copy of the written particulars of employment, signed by both parties within six weeks of commencement of employment. This requirement is not applicable to employees engaged for a fixed period of less than six weeks or anyone expected to work less than 21 hours per week. **S.30 –** makes it an offence to provide an employee with such form with fine of not more than E3, 000.00 or imprisonment of not more than 1 year or both. **S.136 –** requires that before a contractor is awarded a public contract, that contractor is required to certify in writing that the wages, hour and conditions of work or persons to be employed by him on the contract are not less favourable than those contained in the most current wages regulation issued by the Labour Commissioner. **S.143 -** states that the contract with the contractor may be withdrawn as an approved contractor upon recommendations of the Labour Commissioner.	▪ Post award, the contractors will be required to furnish MoET PSU with copies of the written particulars of all its employees or contracts of employment including those who work below 21 hours a week and casual employees. ▪ The contract employment shall at least have the information contained in the prescribed template of the Form Contained in the Second Schedule as can be seen in Appendix 1 ▪ Each contractor will be required to provide MoET PSU with such information as required in terms of S.136 as part of the tendering process.
To promote safety and health at work.	**The Occupational Safety and Health Act 9, 2001** - This Act provide for the safety and health of persons at work and at the workplace and for the	▪ Each contractor will be required to have

	protection of persons other than persons at the workplace against hazards to safety and health arising out of or in connection with the activities of persons in the workplace and to provide for other matters incidental thereto. - **S.9** - entrusts the employer to ensure the safety and health of all its employees, and also to; - Mitigate risks of exposure to danger of its workforce; - Provide personal protective clothing or equipment to employees exposed to wet, dusty, noisy or any conditions that might expose the employees to harsh or dangerous conditions; - To train its workers to perform their work in order to avoid exposure to danger or injury; and - To inform employees of any known hazards or disease associated with the work. **The Factories, Machinery and Construction Works Act 17,** **1972** - This legislation provides for the registration of factories and the regulations of working conditions and the use of machinery at factories, construction works and other premises and for matters incidental thereto. The Act mandates the office of the Labour Commissioner to monitor and inspect any working environment or structure to determine its suitability. - The office of the Labour Commissioner is also required to investigate incident or accident involving any person injured in connection with the activities of the employer.	a SHEQ Officer and First Aider. ▪ Contractors required to keep logs of incidents and should be reported and investigated timeously.
The contractor will conduct induction talks to workers and contractors weekly	**The Workman's Compensation Act 7, 1983** - It provides for the compensation and medical treatment of workmen who suffer injury or contract diseases in the course of their employment. - The scope of its application extends to not an injury or accident that occurs within the workplace but also while the employee is travelling by reasonable means and within any reasonable route between the workplace and his place of residence.	

	-In terms of the Act, Workman is any person who has entered into the works under the contract of service or of apprenticeship or of traineeship whether the contract is express or implied, is oral or in writing whether the remuneration is calculated by time or work done.	
To promote the fair treatment, non-discrimination and equal opportunity of project workers.	**The Employment Act 5/1980** **S.29 -** prohibits employers from discriminating against any person on grounds of race, colour, religion, marital status, sex, national origin, tribal or clan extraction, political affiliation or social status **S.30 -** makes it an offence to discriminate against any person as envisaged in **S.29**. Such employer if found guilty shall be liable on conviction to a fine not exceeding E3,000.00 or imprisonment not exceeding 1 year or both. **S.96 -** mandates employers to accord female employees the same treatment as their male counterparts in the workplace and also pay them 'equal pay for equal work'.	Contractors will be required to comply with national legislation when recruiting.
To prevent the use of all forms of forced labour.	**The Employment Act 5, 1980** **(Part XIV) – Forced Labour** **S.144 -** prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself voluntarily. **S.147 -** states that, if any person acting in an official capacity coerces any person under his charge, that person shall be held personally liable and shall be liable to a fine not exceeding E3,000.00, or imprisonment not exceeding one year or both.	▪ Contractors will be required to comply with national legislation and as precautionary measure the contractor will conduct an induction. ▪ Random inspection will be done on a regular basis to ensure compliance.
To prevent the use of all forms of child labour.	The Country ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182) in 2002. It also signed the African Charter on the Rights and Welfare of the Child in 1992 but has not yet ratified it.	▪ Contractor will be prohibited to employ anyone under the age of 18 years. ▪ Monitoring will be done through the

	The Employment Act 1980 **S.97 -** Prohibits the employment of children below the age of 15. **The Children's Protection and welfare Act 6, 2012** **S.234 -** Minimum age of engagement for children is 15. **S.236 -** children below the age of 18 cannot be engaged in any form of hazardous employment. **S.248 -** any person who employs under age children I liable on conviction to a minimum fine of E100, 000.00 or 5-years' imprisonment or both for a first offender. For a second offender, it is imprisonment of not less than 10 years.	National ID system which every employee is required to produce on employment. ▪ If a contractor is found to have engaged under age kids for the project: - a formal case will be reported to the police and the contract will be terminated.
To support the principles of freedom of association and collective bargaining of project workers	The country has ratified the numerous ILO Conventions aimed at ensuring that member states do protect the notion of collective bargaining. These Conventions include; ILO Convention 87 on Freedom of Association and Protection of the Right to Organize and the ILO Convention 98 on the Right to Organize and Collective Bargaining. Section 32 (2) of The **Constitution of Eswatini, 2005** on the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation. The Industrial Relations Act 2000 (as amended) was enacted to give effect to the collective bargaining, amongst other purposes. Section 4 (c) to (e) of the Act allows for the collective negotiation of terms and conditions of employment. Part 4 of **The Industrial Relations Act 2000 (as amended)** deals with the registration and/or formation of Employee, Staff and Employer Organizations, Federations and International Organizations. In terms of S. 26 (3) of the Act a minimum of six employees can form a trade union by obtaining a Certificate of Registration through the office of the Labour Commissioner (S.27). Once registered, a trade union can recruit any employees	▪ The constructors have recognized unions, i.e., NESMASA and SESMAWU. ▪ Contractors need to inform their workers of their right to organize.

	who falls within its bargaining unit with that particular employer. S.42 (9) states that once the union has recruited more than fifty percent of the employees in respect of which it seeks recognition, the union can then apply for recognition with the employer. The employer is obliged to recognize the trade union if it meets the required threshold. If, however the union membership is below the threshold the employer is not obliged to recognize the union but can exercise its discretion. Once a union is recognized, it has the right to bargain or negotiate for and on behalf of its members and also to represent them at the workplace.	
To provide project workers with accessible means to raise workplace concerns.	If an employee fails to attend the hearing the employer may proceed in with the hearing in the absence of the employee; f) The hearing must be held and concluded within a reasonable time and is to be chaired by an impartial representative; g) A dismissed employee must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal to the Conciliation, Mediation and Arbitration Commission (CMAC). 1. **Individual Grievance Procedure** Clause 4.3 requires every employer to have a Formal Grievance Procedure which should be known and explained to the employee. The Code recommends that such procedure should at least: a) Specify to whom the employee should lodge the grievance. b) Make reference to time frames to allow the grievance to be dealt with expeditiously. c) Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level. d) If a grievance is not resolved, the employee has the right to lodge a complaint with the CMAC.	▪ Contractors will be required to comply with national legislation in this regard. Contractors will be required to have a grievance procedure. ▪ MoET PSU will require contractors to log worker's grievances in monthly reports. ▪ Make reference to time frames to allow the grievance to be dealt with expeditiously.

	2. Collective Grievances and Disputes resulting from the negotiations of Collective agreements **Clauses 4.4** and **4.5** of the Code deals with the handling of collective grievances as raised by the employees. This procedure is usually contained in the Recognition Agreement the parties sign from the onset. What is common to these disputes is that in the event the parties fail to resolve the dispute, either can lodge a dispute with CMAC and subsequently the Industrial Court.	
To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.	**S.20** of **the Constitution** guarantees citizens the right to equality before the law in all spheres and it further affirms that a person shall not be discriminated against on the grounds of gender, race, colour, ethnic origin, tribe, birth, creed or religion, or social or economic standing, political opinion, age or disability. • **S.29** of **The Employment Act 1980** states that, no employer shall discriminate against any person or between employees on grounds of race, colour, religion marital status, sex national origin, tribal or clan extraction, political affiliation or social status. • **Community Workers** are not used by MoET and will not be used for this project. • **Rights of woman – S28 (1)** of **The Constitution** guarantees the rights of woman to equal treatment with men including equal opportunities in political economic and social activities. **S.96 (1)** of **The Employment Act 1980** also requires employers not to discriminate between male and female employees by failing to pay equal pay for equal work. • **Primary Supply Workers -** Registered suppliers are subject to regular review in accordance with the Procurement Act. **S.2** read with **S.16 (7)** of **The Industrial Relations Act 2000** states that where it is found that the reason for the termination of an employee's services is that the employer discriminated against an	Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level. If a grievance is not resolved the employee has the right to lode a dispute with CMAC.

	employee directly or indirectly, that employee shall be awarded compensation of not more than 24 months' remuneration calculated at the rate of the employee's rate of remuneration at the time of dismissal. This compensation serves as a deterrent as is it double the amount of compensation awarded to any other form of compensation.	
To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle from both routine and non-routine circumstances. -To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. -To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. -To have in place effective measures to address emergency events. -To ensure that the safeguarding of	**The Public Health Act, 1969** This Act provides for the establishment of processes to ensure public health at all phases of a project. It also provides for steps to take should there be any incident from the project affecting the public and lays out responsibilities for actions to be taken. **2. The Occupational Health and Safety Act, 2001:** This Act provides for the safety and health of both employees and the public, especially during the construction phase of proposed projects, and specifies processes to be undertaken in order to ensure that safe and health practices are adhered to and implemented at work. **3. The Road Traffic Act, 2007:** This Act provides for the compliance of all road's users and for those organizations such as EEC conducting works on and/or along public roads. **4. EEC Hazard Identification, Risk Assessment and Determining Control Procedure (S-S-SHP-01, REV** **3):** This procedure ensures that EEC has an ongoing hazard identification, risk assessment and management process, necessary for all operations. **Emergency Preparedness Response Plan (SS-SHM-01, REV 1):** This document provides processes for when there are emergency situations at EEC and surrounding areas. It details procedures, and responsibilities. **6. EEC Occupational Health and Safety Implementation Plan (S-S-SH-D-04, REV 1):** This document provides for the management and control of EEC's significant health and safety hazards, with an overall objective to ensure the effective	• National requirements and ESF objectives are aligned. No significant gaps are noted. It is recommended that both World Bank ESF objectives and National Requirements apply to the project.

Personnel and property are carried out in a manner that avoids or minimizes risks to the project affected communities.	implementation and management of health and safety issues. **7. EEC Occupational Health and Safety Policy Statement (S-S-SH-D-01, REV 5):** This document underlines EEC's commitment to the prevention of work-related injury and ill-health associated with the company's activities.	

Appendix 2: Written Particulars of Employment

As required by Section 22 of the Swaziland Employment Act.

SECOND SCHEDULE
(WRITTEN PARTICULARS OF EMPLOYMENT)
(Regulation)

1. Name of Employer ……
2. Name of Employee ……
3. Date Employment began
……
4. Wage and Method of Calculation
……
5. Interval at which wages are paid
……
6. Normal Hours of work
……
7. Short description of employee's work
……
8. Probation Period ……
9. Annual Holiday Entitlement
……
10. Paid Public Holiday
……
11. Payment during sickness
……
12. Maternity Leave (if employee female)
……
13. Nursing Break Entitlement (for female employee) ……
……
14. Notice employee entitled to receive
……
15. Notice employer required to give
……
16. Pension Schedule, Provident Fund Gratuity Schedule etc. (if any, other tan SNPF) …….
17. Any other matter either party wishes to include ……

Notes:
(a) An employee is free to join a trade union or staff association, which is recognized by the undertaking. The address of the Trade Union or Staff Association is:
……

The grievance procedure and disciplinary procedure in this undertaking requires to be followed when a grievance arises or disciplinary action that needs to be taken.
……
(c) When any heading is inapplicable enter NIL.
…… …… Employer's signature
Witness
…… …… Employee's signature
Witness

…….. ……
Date Date

Appendix 3: Contractors SHE File Monitoring Form (ECC)

Contractor Name……

Depot……

Instructions; Tick (√) if available, put a cross(X) if unavailable. Tick (√) if there was activity, put a cross(X) if there was no activity. Tick

(√) if there's evidence, put a cross(X) if there's no evidence. Make a Comment according to the changes that have taken place as reflected by availability, activity and evidence on each SHE item.

#	Monthly Checklist: SHE Items	Available	Activity	Evidence	Comment
1.	Exposure to MoET IMS Policies,				
2.	Valid Working Contract,				
3.	Current Employee List (Q-SOS-P01-F-05)				
4.	Confirmation Letter Inc. copy of ID (per employee)				
5.	Understanding of Resources, roles, responsibilities and authority,				
6.	Inductions – all contractor staff				
7.	HIRA & Reporting; Incidents, accidents &near misses				
8.	Appointment letters; for #9,10,11 below				
9.	SHE Certificates; Safety Rep				
10	SHE Certificates; 1st Aider				
11	Mandatory Qualifications – as per the evaluation form				
12	Vehicles; Bluebook, Daily inspection sheet, Driver Permit				
13	Current Evaluation form				
14	PPE: Branded & Property worn at all times,				
15	Internal Communication; minutes showing meetings,				
16	NCR's Received and closed,				

#	Monthly Checklist: SHE Items	Available	Activity	Evidence	Comment
17	Environment Management Aspects (the 8 elements),				
18	First Aid Kit: availability and usage of the form,				
19	Fire extinguisher, valid				
20	Any other				

SEC SHE Rep …… Signature …… Date compiled ……

Contractor SHE Rep …… Signature …… Date compiled ……

Appendix 4: First Aid Box Contents Checklist

Checked by: **PFM:**

Month and Year: **Work**

Station:

#	Item	Quantity Specified	Quantity present in box	Comment
1.	Adhesive elastic plasters assorted 20's	1 Box		
2.	Roller bandages-conforming 100mm	4 Rolls		
3.	Roller bandages-conforming 75mm	4 Rolls		
4.	CPR Mouthpieces	2		
5.	Cotton wool 50 gram	2 Rolls		
6.	Fabric roll plaster 25mm×3M	1 Roll		
7.	First Aid dressing No 3 75mm×100mm	4		
8.	First Aid dressing No 4 150mm×200mm	4		
9.	Forceps-10cm	1		
10	Gauze swabs 75mm×75mm 100's	1 Packet		
11	Gauze swabs 75mm×75mm Sterile 5's	2 Packets		
12	Gloves-Latex Large	2 Pairs		
13	Gloves-Latex Medium	2 Pairs		
14	Hypoallergenic Adhesive Tape 25mm×3M	1 Roll		
15	Safety Pins Bunch of 12	1 Bunch		
16	Scissors-10cm	1		
17	Splints-Straight	2		
18	Triangular Bandages	4		
19	Wound Cleaner-CENTRIMIDE 1%	1 Bottle		

- **Checklists must be completed every month to ensure compliance with the law.**
- **Contents should be regularly replenished by the respective department.**

ANNEX I: ACCIDENT RESPONSE PROCEDURE

List of Abbreviations	
MoET	Ministry of Education and Training
M&E	Monitoring and Evaluation

INTRODUCTION

This procedure provides a description for the management of accidents/emergencies. The purpose of this procedure is to ensure that for potential major emergency scenarios identified there is a structure and plan in place to manage major emergencies, provide information and assist in the emergency services. The Ministry of Education and Training (MoET) will ensure that this developed procedure provide a swift response in the event of an eligible crisis or emergency.

The preparation of the accident response plan will take into consideration the ESMF and any additional safeguard instruments. The accident response procedure will require consideration of safeguard implications for any proposed emergency supplies procurement or renovation and rehabilitation activities. The World Bank, through the no objection process, will closely examine the nature of the proposed activities, particularly those involving civil work, to ensure that:

1. They are not prohibited under the negative list; and
2. The recipient is aware of the required safeguard compliance documentation before initiating the process by which the proposed works will be prepared and implemented.

Since there is no construction work expected, emergency activities under this project are likely fall into the “Moderate Risk” or “Low Risk” Category. Activities that fall under “Low Risk” will involve procurement of emergency supplies such as medicine and water and do not require the application of safeguard instruments, post screening or assessment. Other emergency supplies, such as fuel products, will require safeguard instruments to ensure procurement, storage and dispensing procedures are adequate.

The MoET will consider the following safeguard elements of the accident response plan before commencement of implementation:

1) Confirming which activities can proceed on the basis of the provisions of the accident response procedure, with no environmental or social assessment, and which ones require assessment prior to being initiated;

2) Rapidly assessing the environmental and social baseline of the planned accident response procedure activities and locations based on readily available information; and
3) Determining the sequencing and implementation plan for:
    - Mobilizing technical assistance and funding to prepare any additional safeguard instruments, e.g., Environmental and Social Management Plan.
    - Preparing the safeguards instruments and carrying out their Bank review, revisions, clearance, and approval.
    - Consultations and disclosure.
    - Establishing roles and responsibilities for safeguards implementation, and monitoring.
    - Estimating the costs for safeguards preparation and implementation.

MONITORING AND EVALUATION

In crisis/emergency response projects, effective monitoring is essential for providing performance feedback during implementation, and data on results that are vital for learning and managing post-disaster recovery and reconstruction efforts. However, in such a situation, monitoring and evaluation is often severely constrained by many factors. The following monitoring modalities will be applicable for this project:

Data for monitoring and evaluation (M&E)

As accident responses are, event-driven and rapidly mobilized, M&E will be mainly on secondary data and qualitative information that is easily obtainable, such as social assessment. Thus, the project will target the collection of secondary data. Primary data collection may be used in selected situations when resources and time permits.

Implementation monitoring

This will focus on planned vs. actual types, numbers, locations, costs, and starting/completion times of activities undertaken.

Performance monitoring

Performance monitoring will rely on:

1) Fields visits by staff of the implementing agency,
2) Reports from supervision consultants, and
3) Meetings with beneficiaries and local communities.

THE ACCIDENT RESPONSE PROCEDURE

The Accident Response Procedure shall be developed in line with the hazards identified and assessed during the initial risk assessment for the sites.

The ministry will appoint an appropriately qualified company to conduct a detailed medical survey for the project sites. The survey recommendations will need to include the minimum first aid requirements for each site and an assessment of external medical facilities and establishments equipped to deal with the emergency situations identified in the procedure.

In preparing an Accident Response Procedure the following must be considered:

a) The types of unplanned events the site may encounter;

b) The impact of restricted visibility on evacuation routes. Areas may be inaccessible or too dangerous to use, stairwells may be smoke logged etc.;

c) The existence of emergency communication facilities to cover any unforeseen situation;

d) The procedure for registering and recording all personnel on the construction site for the purpose of roll calling;

e) The needs of persons with disabilities, persons not familiar with the emergency procedures and persons with language barriers;

f) The need for evacuation procedures to be varied for differing circumstances, specifically providing for underground evacuations where appropriate;

g) Provision for all people who may be at the workplace, including visitors;

h) The procedure for how to mobilize medical help from site (i.e., the detailed, specific stages involved), including details of first aiders and a list of first aid kit locations;

i) Analysis of the transport options for evacuation from site under medical emergencies, severe weather conditions, terrorist threat and prior to/during/following a natural disaster. This should include the access and egress on site with specific consideration of access for Emergency Services;

j) The preferred travel options for emergency evacuation of both individuals and groups. This needs to include evacuation to all possible locations for receiving required treatment. A graphical layout showing alternative routes, methods and travel times should be compiled as a quick reference guide.

Accident Response Procedure Approval

Once the procedure has been completed to the satisfaction of the MoET Team, it must have final approval by the World Bank before issuing to personnel or for general publishing.

A copy of the Accident Response Procedure will be retained in the Project Health, Safety Plan and will provided to the emergency services.

Review of the Accident Response Procedure

The MoET Team will meet regularly, in order to ensure the procedure is applicable to current circumstances and is implemented correctly. Specifically, the team will:

1. Review and where required, establish and implement Accident Response Plans and Procedures;
2. Evaluate the existing Accident Response Procedure in light of current circumstances and any changes to the site or work scope;
3. Review the number of emergency evacuation personnel, consistent with the nature and risk of the buildings, structures and workplaces;
4. Arrange for the training of emergency evacuation personnel; and
5. Assess the effectiveness of evacuation exercises;

Preparedness

Training

The Eswatini Ministry of Education and Training will identify and provide training in accordance with the needs of personnel involved with emergency evacuation activities. They will determine the depth of training required for themselves and all other personnel, given the assessment of risk for each potential emergency scenario and the proximity and skills of the local emergency services.

Consideration will also be given to the number of First Aid personnel and any associated training requirements.

Specific training for the Emergency Team shall include:

a) The operation of all safety equipment including, fire extinguishers, fire hose reels, fire blankets and fire detection and suppression systems;
b) The layout of their area of responsibility;
c) The number, location and additional needs of people with disabilities in their area;

d) Evacuation routes and safe places;

e) Where evacuation procedures need to be modified and how to do this; and

f) How to identify themselves as emergency staff.

Equipment

The MoET will ensure:

1) The emergency equipment specified in the accident response procedure is available on site. Examples of such equipment are:
    - Oil cleans up equipment (e.g., Brooms, absorbent materials, spades, spill kits, etc.) and
    - First Aid / emergency rescue equipment.
2) Availability and location of earthmoving equipment and pumping equipment;
3) Hi-Viz clothing and identification of equipment;
4) Firefighting equipment (e.g., fire hoses, extinguishers);
5) A list of the equipment held in the project sites is provided and verify that the equipment is suitable for the hazards identified, accessible, serviced (if applicable) and in good working order; and
6) Test and maintain the exit signs and alarm systems.

Emergency contacts

The MoET will ensure that the Accident Response Procedure contain telephone contacts.

Communication

A reliable form of communication will be used in the event of an emergency/accident. Consideration will be given to a suitable alarm system, telephone or allocation of a radio channel for internal and external communication. Regular testing of the chosen communication system will occur regularly.

Reporting and Documentation

The ministry will ensure that all accidents are reported and documented. Accidents to be documented will include; 'near miss' incidents, all medical cases, all serious injuries or incidents and fatal incidents.

ANNEX J: OCCUPATIONAL HEALTH AND SAFETY PROCEDURE

List of Abbreviations	
ACM	Asbestos Containing Material
ECDE	Early Childhood Development Education
ESS	Environment and Social Standards
HVAC	Heating Ventilation Air-conditioning
LEL	Lower Exposure Limit
MoET	Ministry of Education and Training
MSDS	Material Safety Data Sheets
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
SCBA	Self Contained Breathing Apparatus
SOPs	Standard Operating Procedures

INTRODUCTION

This procedure takes into consideration the ESS2, the Environment, Health and Safety Guidelines for the World Bank, and The Occupational Health and Safety Act of 2001. Reasonable precautions to protect the health and safety of workers will be implemented, including contractors hired to carry out renovation and rehabilitation works. The Ministry of Education and Training (MoET) will ensure that Contractors to be hired have the technical capability to manage the occupational health and safety issues of their employees, extending the application of activities through formal procurement agreements. So preventative and protective measures will be introduced according to the following order of priority:

1) Eliminating the hazard by removing the activity from the work process;
2) Controlling the hazard at its source through use of engineering controls;
3) Minimizing the hazard through design of safe work systems and administrative or institutional control measures; and

4) Providing appropriate protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE.

The application of prevention and control measures to occupational hazards will be based on comprehensive job safety or job analysis. The results of these analysis will be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazard.

OCCUPATIONAL HEALTH AND SAFETY PROCEDURES

The Ministry of education and Training will lead the implementation of the occupational health and safety in the project and will consider the following aspects:

General Facility Design and Operation

This will cover the identified sites where renovations will take place of which are; ECDE Centres, Community pre-schools, Day Care Centres, KaGogo Centres, Neighbourhood Care Points, Grade 0 being piloted in 80 schools, health care facilities, and in homes with the support from Rural Health motivators.

Integrity of work structures

a) Surfaces, structures and installations will be made easy to clean and maintain, and not allow for accumulation of hazardous compounds;
b) Buildings will be made structurally safe, provide appropriate protection against the climate, and have acceptable light and noise conditions;
c) Fire resistant and noise-absorbing materials, to the extent feasible will be used for cladding on ceilings and walls;
d) Floors will be made level, even, and non-skid; and
e) Heavy oscillating, rotating or alternating equipment will be located in dedicated buildings or structurally isolated sections.

Workspace and exit

a) The space provided for each worker, and in total, will be made adequate for safe execution of all activities, including transport and interim storage of materials and products;
b) Passages to emergency exits will be kept clear and unobstructed at all times;
c) Exits will be clearly marked to be visible in total darkness; and
d) The number and capacity of emergency exits will be made sufficient for safe and orderly evacuation of the greatest number of people present at any time, and there will be a minimum two exits from any work area.

Fire precautions

a) The identified sites to be renovated will be designed to prevent the start of fires through the implementation of fire codes applicable to industrial settings;
b) Other essential measures include: equipping facilities with fire detectors, alarm systems, and fire-fighting equipment. The equipment will be maintained in good working order and be readily accessible. It will be adequate for the dimensions and use of the premises, equipment installed, physical and chemical properties of substances present, and the maximum number of people present;
c) Manual firefighting equipment that is easily accessible and simple to use will also be provided; and
d) Fire and emergency alarm systems that are both audible and visible will be installed.

Potable water supply

a) Adequate supplies of potable drinking water will be provided for the identified sites; and
b) The MoET will ensure that water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) meet drinking water quality standards.

Clean eating area

a) Where there is potential for exposure to substances poisonous by ingestion, suitable arrangements will be made for provision of clean eating areas where personnel are not exposed to the hazardous or noxious substances.

Lighting

a) Workplaces will, to the degree feasible, receive natural light and be supplemented with sufficient artificial illumination to promote workers' safety and health, and enable safe equipment operation; and
b) Emergency lighting of adequate intensity will be installed and automatically activated upon failure of the principal artificial light source to ensure safe shut-down, evacuation, etc.

Safe Access

Passageways for pedestrians and vehicles within and outside centres will be segregated and provide for easy, safe, and appropriate access.

a) Equipment and installations requiring servicing, inspection, and/or cleaning will have unobstructed, unrestricted, and ready access;
b) Hand, knee and foot railings will be installed on stairs, fixed ladders, platforms, permanent and interim floor openings, loading bays, ramps, etc.;
c) Openings will be sealed by gates or removable chains;
d) Covers if feasible will be installed to protect against falling items; and
e) Measures to prevent unauthorized access to dangerous areas will be in place.

First Aid

a) The MoET and appointed Contractors will ensure that qualified first-aid can be provided at all times. Appropriately equipped first-aid stations will be easily accessible throughout the place of work;
b) Eye-wash stations and/or emergency showers will be provided close to all workstations where immediate flushing with water is the recommended first-aid response;
c) Where the scale of work or the type of activity being carried out so requires, dedicated and appropriately equipped first aid room(s) will be provided. First aid stations and rooms will be equipped with gloves, gowns, and masks for protection against direct contact with blood and other body fluids; and
d) Remote sites will have written emergency procedures in place for dealing with cases of trauma or serious illness up to the point at which patient care can be transferred to an appropriate medical facility.

Air supply

a) Sufficient fresh air will be supplied for indoor and confined work spaces. Factors to be considered in ventilation design include physical activity, substances in use, and process related emissions;
b) Mechanical ventilation systems will be maintained in good working order. Point-source exhaust systems required for maintaining a safe ambient environment will have local indicators of correct functioning;
c) Re-circulation of contaminated air is not acceptable. Air inlet filters will be kept clean and free of dust and microorganisms; and
d) Heating, ventilation and air conditioning (HVAC) and industrial evaporative cooling systems will be equipped, maintained and operated so as to prevent growth and spreading of disease agents or breeding of vectors (e.g., mosquitoes and flies) of public health concern.

Work environment temperature

a) The temperature in work, rest room and other welfare facilities will, during service hours, be maintained at a level appropriate for the purpose of the facility.

Communication and Training

OSH training

1) Provisions will be made by the MoET and the appointed contractors to provide OHS orientation training to all new employees to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees; and
2) Training will consist of basic hazard awareness, site specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Any site-specific hazard or colour coding in use will be thoroughly reviewed as part of orientation training.

Visitor orientation

1) A visitor orientation and control program will be established to ensure visitors do not enter hazard areas unescorted.

New task employee and contractor training

1) The MoET will ensure that workers and contractors, prior to commencement of new assignments, have received adequate training and information enabling them to hazardous ambient factors that may be present. The training should adequately cover:
    - Knowledge of materials, equipment, and tools
    - Known hazards in the operations and how they are controlled
    - Potential risks to health
    - Precautions to prevent exposure
    - Hygiene requirements
    - Wearing and use of protective equipment and clothing
    - Appropriate response to operation extremes, incidents and accidents

Basic OHS training

1) A basic occupational training program and specialty courses will be provided, as needed, to ensure that workers are oriented to the specific hazards of individual work assignments;

2) Training will generally be provided to management, supervisors, workers, and occasional visitors to areas of risks and hazards;
3) Workers with rescue and first-aid duties will receive dedicated training so as not to inadvertently aggravate exposures and health hazards to themselves or their co-workers. Training would include the risks of becoming infected with blood–borne pathogens through contact with bodily fluids and tissue; and
4) Through appropriate contract specifications and monitoring, the MoET ensure that service providers, as well as contracted and subcontracted labour, are trained adequately before assignments begin.

Area signage

1) Hazardous areas (electrical rooms, compressor rooms, etc.), installations, materials, safety measures, and emergency exits, etc. will be marked appropriately; and
2) Signage will be in accordance with international standards and be well known to, and easily understood by workers, visitors and the general public as appropriate.

Labelling of equipment

1) All vessels that may contain substances that are hazardous as a result of chemical or toxicological properties, or temperature or pressure, will be labelled as to the contents and hazard, or appropriately colour coded; and
2) Similarly, piping systems that contain hazardous substances will be labelled with the direction of flow and contents of the pipe, or colour coded whenever the pipe passing through a wall or floor is interrupted by a valve or junction device.

Communicate hazard codes

1) Copies of the hazard coding system will be posted outside the facility at emergency entrance doors and fire emergency connection systems where they are likely to come to the attention of emergency services personnel;
2) Information regarding the types of hazardous materials stored, handled or used at facilities, including typical maximum inventories and storage locations, will be shared proactively with emergency services and security personnel to expedite emergency response when needed; and
3) Representatives of local emergency and security services will be invited to participate in periodic (annual) orientation tours and site inspections to ensure familiarity with potential hazards present.

Physical Hazards

As stated by the EHSGs, physical hazards represent potential for accident or injury or illness due to repetitive exposure to mechanical action or work activity. Single exposure to physical hazards may result in a wide range of injuries, from minor and medical aid only, to disabling, catastrophic, and/or fatal. Multiple exposures over prolonged periods can result in disabling injuries of comparable significance and consequence.

Rotating and moving equipment

Injury or death can occur from being trapped, entangled, or struck by machinery parts due to unexpected starting of equipment or unobvious movement during operations. Recommended protective measures include:

i. Where a machine or equipment has an exposed moving part or exposed pinch point that may endanger the safety of any worker, the machine or equipment will be equipped with, and protected by, a guard or other device that prevents access to the moving part or pinch point. Guards should be designed and installed in conformance with appropriate machine safety standards;
ii. Turning off, disconnecting, isolating, and de-energizing (Locked Out and Tagged Out) machinery with exposed or guarded moving parts, or in which energy can be stored (e.g., compressed air, electrical components) during servicing or maintenance; and
iii. Designing and installing equipment, where feasible, to enable routine service, such as lubrication, without removal of the guarding devices or mechanisms.

Noise

i. No employee will be exposed to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day without hearing protection. In addition;
ii. No unprotected ear will be exposed to a peak sound pressure level (instantaneous) of more than 140 dB(C);
iii. The use of hearing protection will be enforced actively more especially to the appointed contractors when the equivalent sound level over 8 hours reaches 85 dB(A) and the hearing protective devices provided will be capable of reducing sound levels at the ear to at least 85 dB(A);
iv. Prior to the issuance of hearing protective devices as the final control mechanism, use of acoustic insulating materials, isolation of the noise source, and other engineering controls will be investigated and implemented, where feasible; and
v. Periodic medical hearing checks should be performed on workers exposed to high noise levels.

Vibrations

i. Exposure to hand-arm vibration from equipment such as hand and power tools, or whole-body vibrations from surfaces on which the worker stands or sits, will be controlled through choice of equipment, installation of vibration dampening pads or devices, and limiting the duration of exposure.

Electrical

Exposed or faulty electrical devices, panels, cables, cords and hand tools, can pose a serious risk to workers. Overhead wires can be struck by metal devices, such as poles or ladders, and by vehicles with metal booms. Vehicles or grounded metal objects brought into close proximity with overhead wires can result in arcing between the wires and the object, without actual contact. Recommended actions include:

i. Marking all energized electrical devices and lines with warning signs;
ii. Locking out (de-charging and leaving open with a controlled locking device) and tagging-out (warning sign placed on the lock) devices during service or maintenance;
iii. Checking all electrical cords, cables, and hand power tools for frayed or exposed cords and following manufacturer recommendations for maximum permitted operating voltage of the portable hand tools;
iv. Double insulating / grounding all electrical equipment used in environments that are, or may become, wet; using equipment with ground fault interrupter protected circuits;
v. Protecting power cords and extension cords against damage from traffic by shielding or suspending above traffic areas;
vi. Appropriate labelling of service rooms housing high voltage equipment (‘electrical hazard’) and where entry is controlled or prohibited;
vii. Establishing “No Approach” zones around or under high voltage power lines;
viii. Rubber tired construction or other vehicles that come into direct contact with, or arcing between, high voltage wires may need to be taken out of service for periods of 48 hours and have the tires replaced to prevent catastrophic tire and wheel assembly failure, potentially causing serious injury or death; and
ix. Conducting detailed identification and marking of all buried electrical wiring prior to any excavation work.

Eye hazards

Solid or liquid particles from a wide variety of operations during the renovation of the appointed sites may strike a worker in the eye causing an eye injury or permanent blindness. So, this procedure outlines recommended measures that can be implemented which include:

i. Use of machine guards or splash shields and/or face and eye protection devices, such as safety glasses with side shields, goggles, and/or a full-face shield;
ii. Specific Safe Operating Procedures (SOPs) may be required for use of sanding and grinding tools and/or when working around liquid chemicals;
iii. Frequent checks of these types of equipment prior to use to ensure mechanical integrity;
iv. Machine and equipment guarding should conform to the Factories, Machinery and Construction Works Act of 1972;
v. Moving areas where the discharge of solid fragments, liquid, or gaseous emissions can reasonably be predicted (e.g., discharge of sparks from a metal cutting station, pressure relief valve discharge) away from places expected to be occupied or transited by workers or visitors;
vi. Where machine or work fragments could present a hazard to transient workers or passers-by, extra area guarding or proximity restricting systems will be implemented, or PPE required for transients and visitors; and
vii. Provisions will be made for persons who have to wear prescription glasses either through the use over glasses or prescription hardened glasses.

Welding or hot work

The Environment Health and Safety Guidelines mention that welding creates an extremely bright and intense light that may seriously injure a worker's eyesight. In extreme cases, blindness may result. Additionally, welding may produce noxious fumes to which prolonged exposure can cause serious chronic diseases. Recommended measures include:

i. Provision of proper eye protection such as welder goggles and/or a full-face eye shield for all personnel involved in, or assisting, welding operations;
ii. Additional methods may include the use of welding barrier screens around the specific work station (a solid piece of light metal, canvas, or plywood designed to block welding light from others);
iii. Devices to extract and remove noxious fumes at the source may also be required; and
iv. Special hot work and fire prevention precautions and Standard Operating Procedures (SOPs) will be implemented if welding or hot cutting is undertaken outside established welding work stations, including 'Hot Work Permits, stand-by fire extinguishers, stand-by fire watch, and maintaining the fire watch for up to one hour after welding or hot cutting has terminated.

Site traffic

The Eswatini Ministry of Education and training will ensure that vehicle operators, including those in construction have all been trained and have valid licences. The ministry will also ensure that:

i. Drivers undergo medical surveillance;
ii. Rights-of-way, site speed limits, vehicle inspection requirements, operating rules and procedures (e.g., prohibiting operation of forklifts with forks in down position), and control of traffic patterns or direction have been established in all the appointed sites; and
iii. The circulation of delivery and private vehicles are to defined routes and areas, giving preference to 'one-way' circulation, where appropriate.

Working environment temperature

Exposure to hot or cold working conditions in indoor or outdoor environments can result in temperature stress-related injury or death. The use of personal protective equipment (PPE) to protect against other occupational hazards can accentuate and aggravate heat-related illnesses. Extreme temperatures in permanent work environments will be avoided through implementation of engineering controls and ventilation. Where this is not possible, such as during short-term outdoor work, temperature-related stress management procedures will be implemented which include:

i. Monitoring weather forecasts for outdoor work to provide advance warning of extreme weather and scheduling work accordingly;
ii. Providing temporary shelters to protect against the elements during working activities or for use as rest areas;
iii. Use of protective clothing; and
iv. Providing easy access to adequate hydration such as drinking water or electrolyte drinks, and avoiding consumption of alcoholic beverages.

Ergonomics, repetitive motion and manual handling

Injuries due to ergonomic factors, such as repetitive motion, overexertion, and manual handling, take prolonged and repeated exposures to develop, and typically require periods of weeks to months for recovery. These OHS problems will be minimized or eliminated more especially during renovation and rehabilitation activities to maintain a productive workplace. Controls may include:

i. Use of mechanical assists to eliminate or reduce exertions required to lift materials, hold tools and work objects, and requiring multi-person lifts if weights exceed thresholds;
ii. Selecting and designing tools that reduce force requirements and holding times, and improve postures;
iii. Providing user adjustable work stations;
iv. Incorporating rest and stretch breaks into work processes, and conducting job rotation Implementing quality control and maintenance programs that reduce unnecessary forces and exertions; and
v. Taking into consideration additional special conditions such as left-handed persons.

Working at heights

Fall prevention and protection measures will be implemented whenever a worker is exposed to the hazard of falling more than two meters; into operating machinery; into water or other liquid; into hazardous substances; or through an opening in a work surface. Fall prevention / protection measures may also be warranted on a case-specific basis when there are risks of falling from lesser heights. Fall prevention measures to be considered by the ministry and contractors may include:

i. Installation of guardrails with mid-rails and toe boards at the edge of any fall hazard area;
ii. Proper use of ladders and scaffolds by trained employees;
iii. Use of fall prevention devices, including safety belt and lanyard travel limiting devices to prevent access to fall hazard area, or fall protection devices such as full body harnesses used in conjunction with shock absorbing lanyards;
iv. Appropriate training in use, serviceability, and integrity of the necessary PPE; and
v. Inclusion of rescue and/or recovery plans, and equipment to respond to workers after an arrested fall.

Illumination

The MoET will ensure that light intensity is adequate in all the appointed to be renovated or rehabilitated. Below are controls the ministry will ensure are implemented for the sites:

i. Use of energy efficient light sources with minimum heat emission;
ii. Undertaking measures to eliminate glare / reflections and flickering of lights; and
iii. Taking precautions to minimize and control optical radiation including direct sunlight. Exposure to high intensity UV and IR radiation and high intensity visible light will also be controlled · Controlling laser hazards in accordance with equipment specifications,

certifications, and recognized safety standards. The lowest feasible class Laser will be applied to minimize risks.

Chemical Hazards

As stated by the World Bank's Environment, Health, and Safety Guidelines, Chemical hazards represent potential for illness or injury due to single acute exposure or chronic repetitive exposure to toxic, corrosive, sensitizing or oxidative substances. They also represent a risk of uncontrolled reaction, including the risk of fire and explosion, if incompatible chemicals are inadvertently mixed. Chemical hazards can most effectively be prevented through a hierarchical approach and the ministry will ensure:

1. Replacement of the hazardous substance with a less hazardous substitute;
2. Implementation of engineering and administrative control measures to avoid or minimize the release of hazardous substances into the work environment keeping the level of exposure below internationally established or recognized limits;
3. Keeping the number of employees exposed, or likely to become exposed to a minimum;
4. Communicating chemical hazards to workers through labelling and marking. Any means of written communication should be in an easily understood language and be readily available to exposed workers and first-aid personnel;
5. Proving Materials Safety Data Sheets (MSDS), or equivalent for all chemical presents and used at the sites more especially during renovation works; and
6. Training workers in the use of the available information (such as MSDSs), safe work practices, and appropriate use of PPE.

Air quality

Poor air quality due to the release of contaminants into the work place can result in possible respiratory irritation, discomfort, or illness to workers. The MoET and appointed Contractors will take appropriate measures to maintain air quality. These include:

1. Maintaining levels of contaminant dusts, vapours and gases in the work environment; and
2. Developing and implementing work practices to minimize release of contaminants into the work environment including:
    - Direct piping of liquid and gaseous materials
    - Minimized handling of dry powdered materials
    - Enclosed operations
    - Local exhaust ventilation at emission / release points

- Vacuum transfer of dry material rather than mechanical or pneumatic conveyance
- Indoor secure storage, and sealed containers rather than loose storage

Fire and explosions

- Fires and or explosions resulting from ignition of flammable materials or gases can lead to loss of property as well as possible injury or fatalities to project workers. The Eswatini Ministry of Education and Training will implement Prevention and control strategies which include: Storing flammables away from ignition sources and oxidizing materials. Further, flammables storage area should be;
- Remote from entry and exit points into buildings;
- Away from facility ventilation intakes or vents;
- Be equipped with fire extinguishing devices; Where the flammable material is mainly comprised of dust, providing electrical grounding, spark detection, and, if needed, quenching systems; and
- Providing specific worker training in handling of flammable materials, and in fire prevention or suppression.

Corrosive, oxidizing and reactive chemicals

The MoET will ensure control measures are being implemented regarding corrosive, oxidizing, and reactive chemicals used more especially during renovation activities since these chemicals require control measures as flammable materials. The added hazard of these chemicals is that inadvertent mixing or intermixing may cause serious adverse reactions. This can lead to the release of flammable or toxic materials and gases, and may lead directly to fires and explosions. These types of substances have the additional hazard of causing significant personal injury upon direct contact, regardless of any intermixing issues. The following controls will be observed in the work environment when handling such chemicals:

Corrosive, oxidizing and reactive chemicals will be segregated from flammable materials and from other chemicals of incompatible class (acids vs. bases, oxidizers vs. reducers, water sensitive vs. water based, etc.), stored in ventilated areas and in containers with appropriate secondary containment to minimize intermixing during spills;

Workers who are required to handle corrosive, oxidizing, or reactive chemicals will be provided with specialized training and provided with, and wear, appropriate PPE (gloves, apron, splash suits, face shield or goggles, etc.); and

Where these chemicals are used, handled, or stored, qualified first-aid will be ensured at all times.

Asbestos containing materials

The ministry will ensure that the use of asbestos containing materials (ACM) is avoided in new buildings or as a new material in remodelling or renovation activities. Existing facilities with ACM will have an asbestos management plan developed which clearly identifies the locations where the ACM is present, its condition (e.g., whether it is in friable form with the potential to release fibres), procedures for monitoring its condition, procedures to access the locations where ACM is present to avoid damage, and training of staff who can potentially come into contact with the material to avoid damage and prevent exposure. The plan will be made available to all persons involved in operations and maintenance activities. Repair or removal and disposal of existing ACM in buildings will only be performed by specially trained personnel.

Biological Hazards

Biological agents represent potential for illness or injury due to single acute exposure or chronic repetitive exposure. The Ministry of Education and Training will implement the following preventive measures:

1. If the nature of the activity permits, use of any harmful biological agents will be avoided and replaced with an agent that, under normal conditions of use, is not dangerous or less dangerous to workers;
2. Work processes, engineering, and administrative controls will be designed, maintained, and operated to avoid or minimize release of biological agents into the working environment;
3. The number of employees exposed or likely to become exposed will be kept at a minimum;
4. The MoET will review and assess known and suspected presence of biological agents at the place of work and implement appropriate safety measures, monitoring, training, and training verification programs; and
5. Measures to eliminate and control hazards from known and suspected biological agents at the place of work will be designed, implemented and maintained.

Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems. PPE is considered to be a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. The MoET will ensure the following measures for use of PPE is implemented:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE will be part of the recurrent training programs for employees; and
- Selection of PPE should be based on the hazard and risk ranking described earlier in this procedure, and selected according to criteria on performance and testing established.

Special Hazard Environments

As defined by the EHSGs of the World Bank, special hazard environments are work situations where all of the previously described hazards may exist under unique or especially hazardous circumstances. The Eswatini Ministry of Education and Training will ensure that extra precautions in application of precautions regarding these environments is considered. These special hazard environments may include:

Confined spaces

Confined spaces can occur in enclosed or open structures or locations. Serious injury or fatality can result from inadequate preparation to enter a confined space or in attempting a rescue from a confined space. Management approaches that will be considered by the MoET may include:

- Engineering measures will be implemented to eliminate, to the degree feasible, the existence and adverse character of confined spaces;
- Permit-required confined spaces will be provided with permanent safety measures for venting, monitoring, and rescue operations, to the extent possible;
- The area adjoining an access to a confined space will provide ample room for emergency and rescue operations; and
- Prior to entry into a permit-required confined space:
    - Process or feed lines into the space will be disconnected or drained, and blanked and locked-out;
    - Mechanical equipment in the space should be disconnected, de-energized, locked-out, and braced, as appropriate;

- The atmosphere within the confined space should be tested to assure the oxygen content is between 19.5 percent and 23 percent, and that the presence of any flammable gas or vapor does not exceed 25 percent of its respective Lower Explosive Limit (LEL);
- If the atmospheric conditions are not met, the confined space should be ventilated until the target safe atmosphere is achieved, or entry is only to be undertaken with appropriate and additional PPE;
- Safety precautions should include Self Contained Breathing Apparatus (SCBA), life lines, and safety watch workers stationed outside the confined space, with rescue and first aid equipment readily available; and
- Before workers are required to enter a permit-required confined space, adequate and appropriate training in confined space hazard control, atmospheric testing, use of the necessary PPE, as well as the serviceability and integrity of the PPE should be verified. Further, adequate and appropriate rescue and / or recovery plans and equipment should be in place before the worker enters the confined space.

Lone and isolated workers

A lone and isolated worker is a worker out of verbal and line of sight communication with a supervisor, other workers, or other persons capable of providing aid and assistance, for continuous periods exceeding one hour. The worker is therefore at increased risk should an accident or injury occur.

The Eswatini Ministry of Education and Training will ensure that:

- Where workers may be required to perform work under lone or isolated circumstances, Standard Operating Procedures (SOPs) should be developed and implemented to ensure all PPE and safety measures are in place before the worker starts work. SOPs will establish, at a minimum, verbal contact with the worker at least once every hour, and ensure the worker has a capability for summoning emergency aid; and
- If the worker is potentially exposed to highly toxic or corrosive chemicals, emergency eye-wash and shower facilities will be equipped with audible and visible alarms to summon aid whenever the eye-wash or shower is activated by the worker and without intervention by the worker.

Monitoring

Occupational health and safety monitoring programs will verify the effectiveness of prevention and control strategies. The selected indicators will be representative of the most significant

occupational, health, and safety hazards, and the implementation of prevention and control strategies. The Ministry of Education and Training will ensure that the occupational health and safety monitoring program include:

A. Safety inspection: This will include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection will verify that issued PPE continues to provide adequate protection and is being worn as required. All instruments installed or used for monitoring and recording of working environment parameters will be regularly tested and calibrated, and the respective records maintained;
B. Surveillance of the working environment: the MoET will document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Generally, monitoring will be performed during renovation and rehabilitation of facilities of facilities or equipment and at the end of the defect and liability period, and otherwise repeated according to the monitoring plan;
C. Surveillance of workers health: When extraordinary protective measures are required (for example, against biological agents Groups 3 and 4, and/or hazardous compounds), workers will be provided with appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter. The surveillance should, if deemed necessary, be continued after termination of the employment; and
D. Training: Training activities for employees and visitors will be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, will be documented adequately. Service providers and contractors will be contractually required to submit to the employer adequate training documentation before start of their assignment.

Accidents and disease monitoring

The MoET will establish procedures and systems for reporting and recording:

a) Occupational accidents and diseases
b) Dangerous occurrences and incidents

These systems will enable workers to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health.

i. The systems and the MoET will further enable and encourage workers to report to management all:
    - Occupational injuries and near misses

- Suspected cases of occupational disease
- Dangerous occurrences and incidents

ii. All reported occupational accidents, occupational diseases, dangerous occurrences, and incidents together with near misses should be investigated with the assistance of a person knowledgeable/competent in occupational safety. The investigation should:

- Establish what happened
- Determine the cause of what happened
- Identify measures necessary to prevent a recurrence

References

- Environment, Health and Safety Guidelines (EHSGs) for the World Bank
- Occupational Health and Safety Act, 2001
- Factories, Machinery and Construction Works Act, 1972
- Workmen Act, 1993
- Waste Regulations, 2000
- Litter Regulations, 2011
- Game Act, 1991

ANNEX K: COMMUNITY HEALTH AND SAFETY PROCEDURE

List of Abbreviations	
EHSGs	Environment Health and Safety Guidelines
MoET	Ministry of Education and Training
WHO	World Health Organization

INTRODUCTION

The Environment and Social Standard (ESS4) recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. It addresses health, safety and security risks and impacts on project-affected communities and the corresponding responsibility of borrowers to avoid or minimize such risks and impacts with particular attention to people who, because their circumstances may be vulnerable. ESS4 is relevant to the project because some of the appointed sites to be renovated and rehabilitated are found in communities. The Ministry of Education and Training will ensure that the necessary prevention measures are being implemented.

COMMUNITY HEALTH AND SAFETY PROCEDURES

Water Quality and Availability

Communities may have groundwater or surface water which they use for drinking and irrigation purposes. Project activities may have adverse impacts on water availability and quality.

The Eswatini Ministry of Education and Training will ensure that:

Water quality

a) Drinking water sources, whether public or private, are at all times protected so that they meet or exceed applicable national acceptability standards or in their absence the current edition of WHO Guidelines for Drinking-Water Quality;
b) Air emissions, wastewater effluents, oil and hazardous materials, and wastes will be managed according to the guidance provided in the respective sections of the General EHS Guidelines with the objective of protecting soil and water resources;
c) Where the project includes the delivery of water to the community or to users of facility infrastructure (such as hotel hosts and hospital patients), where water may be

used for drinking, cooking, washing, and bathing, water quality will comply with national acceptability standards or in their absence the current edition of with WHO Drinking Water Guidelines. Water quality for more sensitive well-being-related demands such as water used in health care facilities or food production may require more stringent, industry-specific guidelines or standards, as applicable; and

d) Any dependency factors associated with the delivery of water to the local community will be planned for and managed to ensure the sustainability of the water supply by involving the community in its management to minimize the dependency in the long-term.

Water availability

1) The MoET will ensure that the potential effect of groundwater or surface water abstraction for project activities is properly assessed through a combination of field testing and modelling techniques, accounting for seasonal variability and projected changes in demand in the project area; and
2) The ministry will also ensure that project activities do not compromise the availability of water for personal hygiene needs and will take account of potential future increases in demand.

Structural Safety of Project Infrastructure

Hazards posed to the public while accessing project facilities may include: Physical trauma associated with failure of building structures, Burns and smoke inhalation from fires, Injuries suffered as a consequence of falls or contact with heavy equipment, Respiratory distress from dust, fumes, or noxious odours, and Exposure to hazardous materials.

The Ministry of Education and Training will ensure that the following issues are considered and incorporated as appropriate into the planning, siting, and design phases of a project:

1. Methods of physical separation around project sites to protect the public from major hazards associated with hazardous materials incidents or process failure, as well as nuisance issues related to noise, odours, or other emissions.

Although major design changes may not be feasible during the operation phase of a project, hazard analysis will be undertaken to identify opportunities to reduce the consequences of a failure or accident. Illustrative management actions will include:

A. Reducing inventories of hazardous materials through inventory management and process;

B. Modifying process or storage conditions to reduce the potential consequences of an accidental off-site release;
C. Improving shut-down and secondary containment to reduce the amount of material escaping from containment and to reduce the release duration;
D. Reducing the probability that releases will occur through improved site operations and control, and through improvements in maintenance and inspection;
E. Reducing off-site impacts of releases through measures intended to contain explosions and fires, alert the public, provide for evacuation of surrounding areas, and establish safety zones around a site; and
F. Ensure the provision of emergency medical services to the public.

Life and Fire Safety

All appointed potential sites accessible to the public will be operated in full compliance with local building codes, local fire department regulations, local legal/insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard.

A plan will be prepared by a suitably qualified professional, and will adequately cover, but not be limited to, the issues addressed briefly in the following point.

Fire prevention

Fire prevention will address the identification of fire risks and ignition sources, and measures needed to limit fast fire and smoke development. These issues include:

a) Fuel load and control of combustibles
b) Ignition sources
c) Interior finish flame spread characteristics
d) Interior finish smoke production characteristics
e) Human acts, and housekeeping and maintenance

Means of egress

Means of Egress will include all design measures that facilitate a safe evacuation by residents and/or occupants in case of fire or other emergency, such as:

- Clear, unimpeded escape routes
- Accessibility to the impaired/handicapped
- Marking and signing
- Emergency lighting

Detection and alarm systems

These systems will encompass all measures, including communication and public address systems needed to detect a fire.

Compartmentation

All measures to prevent or slow the spread of fire and smoke will be considered. These include; Separations, Fire walls, Floors, Doors, Dampers, and Smoke control systems.

Fire suppression and control

Fire suppression and control will include all automatic and manual fire protection installations, such as:

- Automatic sprinkler systems
- Manual portable extinguishers
- Fire hose reel

Emergency response plan

An Emergency Response Plan will be developed to assist staff and emergency response teams during real life emergency and training exercises.

Operation and maintenance

Schedules for mandatory regular maintenance and testing of life and fire safety features will be prepared to ensure that mechanical, electrical, and civil structures and systems are at all times in conformance with life and fire safety design criteria and required operational readiness.

Specific Requirements for Existing Buildings

The MoET will appoint a suitably qualified professional who will conduct a complete life and fire safety review of existing buildings slated for renovation. The findings and recommendations of the review will be used as the basis to establish the scope of work of a Corrective Action Plan and a time frame for implementing the changes.

Traffic Safety

Traffic safety will be promoted by all project personnel during displacement to and from the workplace, and during operation of project equipment on private or public roads. Prevention and control of traffic related injuries and fatalities will include the adoption of safety measures that are protective of project workers and of road users, including those who are most vulnerable to road traffic accidents. Where the project may contribute to a significant increase

in traffic along existing roads, or where road transport is a significant component of a project, recommended measures will include:

- Minimizing pedestrian interaction with construction vehicles;
- Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present;
- Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns);
- Employing safe traffic control measures, including road signs and flag persons to warn of dangerous conditions;
- Coordination with emergency responders to ensure that appropriate first aid is provided in the event of accidents; and
- Using locally sourced materials, whenever possible, to minimize transport distances.

Transport of Hazardous Materials

General hazardous materials transport

The Ministry of Education and Training will ensure that the project has procedures in place that ensure compliance with local laws and international requirements applicable to the transport of hazardous materials. MoET will ensure that the developed procedures include:

1. Proper labelling of containers, including the identity and quantity of the contents, hazards, and shipper contact information;
2. Volume, nature, integrity and protection of packaging and containers used for transport are appropriate for the type and quantity of hazardous material and modes of transport involved;
3. Adequate transport vehicle specifications;
4. Training of employees involved in the transportation of hazardous materials regarding proper shipping procedures and emergency procedures;
5. Using labelling and placarding (external signs on transport vehicles), as required; and
6. Provision of necessary means for emergency response on call 24 hours/day.

Major Transportation of Hazards

The EHSGs requires that Guidance related to major transportation of hazards be implemented in addition to measures presented in the preceding section for preventing or minimizing the consequences of catastrophic releases of hazardous materials, which may result in toxic, fire, explosion, or other hazards during transportation.

With that knowledge, the MoET will if the project will transport hazardous materials at or above the threshold quantities during renovation of structures in the appointed sites prepare a Hazardous Materials Transportation Plan containing all of the elements presented below:

Hazard Assessment

The hazard assessment will identify the potential hazard involved in the transportation of hazardous materials by reviewing:

A. The hazard characteristics of the substances identified during the screening stage;
B. The history of accidents, both by the company and its contractors, involving hazardous materials transportation; and
C. The existing criteria for the safe transportation of hazardous materials, including environmental management systems used by the company and its contractors.

Management actions

Management of Change: the management action will address;

- The technical basis for changes in hazardous materials offered for transportation, routes and/or procedures;
- The potential impact of changes on health and safety;
- Modification required to operating procedures;
- Authorization requirements;
- Employees affected; and
- Training needs.

Compliance Audit**:** A compliance audit will evaluate compliance with prevention requirements for each transportation route or for each hazardous material, as appropriate.

Incident Investigation: Since incidents can provide valuable information about transportation of hazards and the steps needed to prevent accidental releases. The MoET will ensure that incident investigation procedures are implemented to ensure that:

- Investigations are initiated promptly
- Summaries of investigations are included in a report
- Report findings and recommendations are addressed
- Reports are reviewed with staff and contractors

Employee Participation*:* There will be a written plan of action regarding the implementation of active employee participation in the prevention of accidents.

Contractors: The MoET will ensure that the appointed contractor has:

- Safety performance procedures and safety and hazard information
- Observe safety practices
- Appropriate training for their employees
- Employees who know process hazards and applicable emergency actions
- Prepared and submit training records
- Informed employees about the hazards presented by their work

Training: Good training provide employees with information necessary to understand how to operate safely. The Eswatini Ministry of Education and Training will ensure that the training program include:

- The list of employees to be trained
- Specific training objectives
- Mechanisms to achieve objectives (i.e., hands-on workshops, videos, etc.)
- Means to determine the effectiveness of the training program
- Training procedures for new hires and refresher programs

Preventative measures

The MoET will ensure that the plan include procedures to implement preventive measures specific to each hazardous material offered for transportation, including:

a) Classification and segregation of hazardous materials in warehouses and transport units
b) Packaging and packaging testing
c) Marking and labelling of packages containing hazardous materials
d) Handling and securing packages containing hazardous materials in transport units
e) Marking and placarding of transport units
f) Documentation (e.g., bills of lading)
g) Application of special provisions, as appropriate

Emergency preparedness and response

The ministry will ensure that an emergency preparedness and response plan is prepared and covers:

- *Planning Coordination*: This will include procedures for; Informing the public and emergency response agencies, documenting first aid and emergency medical treatment, taking emergency response actions, and reviewing and updating the emergency response plan to reflect changes and ensuring that the employees are informed of such changes.

- *Emergency Equipment:* The plan will include procedures for using, inspecting, testing, and maintaining emergency response equipment.
- *Training:* Employees will be trained in any relevant procedures.

Disease Prevention

Communicable diseases

The EHSGs state that health hazards typically associated with large development projects are those relating to poor sanitation and living conditions, sexual transmission and vector-borne infections. Recognizing that no single measure is likely to be effective in the long term, successful initiatives typically involve a combination of behavioural and environmental modifications.

The Ministry of Education and Training will ensure that the following is intervened, more especially during the renovation and rehabilitation of the appointed site:

1. Surveillance and active screening and treatment of workers.
2. Prevention of illnesses among workers in local communities by:
    - Undertaking health awareness and education initiatives, for example, by implementing an information strategy to reinforce person-to-person counselling addressing systemic factors that can influence individual behaviour as well as promoting individual protection, and protecting others from infection, by encouraging condom use;
    - Training health workers in disease treatment;
    - Conducting immunization programs for workers in local communities to improve health and guard against infection;
    - Provision of health services;
    - Provision of treatment through standard case management in on-site or community health care facilities;
    - Ready access to medical treatment, confidentiality and appropriate care, particularly with respect to migrant workers; and
    - Promoting collaboration with local authorities to enhance access of workers families and the community to public health services and promote immunization.

Vector-borne diseases

The MoET will ensure that diverse interventions aimed at eliminating the factors that lead to disease are implemented. For project sites in close proximity with communities, the MoET will try and involve the following control measures:

1) Sanitary improvements and elimination of breeding habitats close to human settlements;
2) Elimination of unusable impounded water;
3) Increase in water velocity in natural and artificial channels;
4) Considering the application of residual insecticide to dormitory walls;
5) Implementation of integrated vector control programs;
6) Promoting use of repellents, clothing, netting, and other barriers to prevent insect bites;
7) Use of chemoprophylaxis drugs by non-immune workers and collaborating with public health officials to help eradicate disease reservoirs;
8) Monitoring and treatment of circulating and migrating populations to prevent disease reservoir spread;
9) Collaboration and exchange of in-kind services with other control programs in the project area to maximize beneficial effects;
10) Educating project personnel and area residents on risks, prevention, and available treatment;
11) Monitoring communities during high-risk seasons to detect and treat cases;
12) Distributing appropriate education materials; and
13) Following safety guidelines for the storage, transport, and distribution of pesticides to minimize the potential for misuse, spills, and accidental human exposure.

Emergency Preparedness and Response

The ministry will ensure that the emergency preparedness and response plan take into consideration the following key components:

Worker notification and communication

Alarm bells, visual alarms, or other forms of communication will be used to reliably alert workers to an emergency. Related measures include:

a) Testing warning systems at least annually (fire alarms monthly), and more frequently if required by local regulations, equipment, or other considerations; and
b) Installing a back-up system for communications on-site with off-site resources, such as fire departments, in the event that normal communication methods may be inoperable during an emergency.

Community notification

If a local community may be at risk from a potential emergency arising at the facility, the MoET will implement communication measures to alert the community, such as:

1. Audible alarms, such as fire bells or sirens;
2. Fan out telephone call lists;
3. Vehicle mounted speakers;
4. Communicating details of the nature of the emergency; and
5. Communicating protection options (evacuation, quarantine).

Media and agency relations

The ministry will ensure that emergency information is communicated to the media through:

i. A trained, local spokesperson able to interact with relevant stakeholders, and offer guidance to the company for speaking to the media, government, and other agencies; and
ii. Written press releases with accurate information, appropriate level of detail for the emergency, and for which accuracy can be guaranteed.

Emergency Resources

Finance and emergency funds

The MoET will ensure that a mechanism is provided for funding emergency activities.

Fire services

The ministry will consider the level of local firefighting capacity and whether equipment is available for use at the facility in the event of a major emergency or natural disaster. If insufficient capacity is available, firefighting capacity will be acquired that may include pumps, water supplies, trucks, and training for personnel.

Medical services

The MoET will provide first aid attendants for the facility as well as medical equipment suitable for the personnel, type of operation, and the degree of treatment likely to be required prior to transportation to hospital.

Availability of resources

Appropriate measures for managing the availability of resources in case of an emergency will include:

1. Maintaining a list of external equipment, personnel, facilities, funding, expert knowledge, and materials that may be required to respond to emergencies;

Providing personnel who can readily call up resources, as required;

2. Tracking and managing the costs associated with emergency resources;
3. Considering the quantity, response time, capability, limitations, and cost of these resources, for both site-specific emergencies, and community or regional emergencies; and
4. Considering if external resources are unable to provide sufficient capacity during a regional emergency and whether additional resources may need to be maintained on-site.

Contact list

The Eswatini Ministry of Education and Training will develop a list of contact information for all internal and external resources and personnel. The list will include the name, description, location, and contact details (telephone, email) for each of the resources.

ANNEX L: WASTE MANAGEMENT PLAN

List of Abbreviations	
ECDE	Early Childhood Development Education
EHS	Environment Health and Safety
EHSGs	Environment Health Safety Guidelines

INTRODUCTION

The purpose of the Waste Management Plan is to describe the principles, procedures and management of the waste that will be generated by the ESMF programme at all the schools and centres that will be involved in the project. The plan has been developed to ensure wastes are reduced, reused, and recycled wherever possible.

In accordance with requirements of the World Bank Environment, Health and Safety Guidelines, and The Waste Regulations, 2000, Litter Regulations, 2011, The Bamako Convention on the Ban of Import Hazardous Waste into Africa, and The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the Waste Management Plan outlines measures to manage and mitigate waste generation and resource consumption during the operation of the project. The Plan includes details on the following:

- The types of waste generated during operation,
- Procedures to collect and dispose of waste,
- Measures that will be implemented to minimize waste generation associated with the project, and
- A program for monitoring the effectiveness of these measures.

The Waste Management Plan is designed to support an ecological based management approach underpinned by adaptive management principles.

This plan also considers other aspects to waste management such as waste reduction, segregation of waste, disposal of waste, financial impacts of waste disposal and recording, monitoring, education and reviewing. This plan outlines the waste management procedures that have been put in place and demonstrate the benefits to the environment, how the effects can be measured and how these procedures and practices are sustainable.

WASTE TYPES

The implementation of the ESMF will generate a range of wastes, including end of life e-waste from computers, printers and laptops, contaminated/hazardous electronic wastes, and solid waste like plastics, cardboard, garbage etc. During the operation of facilities. Liquid waste in the form of sewerage waste categorizing

Table 1 provides an overview of the potential wastes, their classification and avenues of disposal.

Waste Types	Waste Form	Waste stream	Disposal	Waste Handling
e-waste from computers, printers and laptops	S	Product-related stream	Recycling, re-use, or landfill	Approved disposal service
Old batteries from solar systems	L	Product -related stream	Recycling	Approved disposal service
Other solid waste from solar panels	S	Product -related stream	Recycling, re-use, or landfill	Contracted Approved disposal service
Solid waste like plastic, card board, and garbage	S	Material -related stream	Recycling, reuse, or landfill	Recycling depot
Other solid wastes	S	Material -related stream	Recycling, re-use, or landfill	Recycling depot
Liquid waste (sewerage from sanitary facilities)	P	Other	Recycling	Recycling depot

Waste materials fall into four categories for management, which include:

- Re use,
- Recycle,
- Residual wastes, and
- Landfill.

Re-use

If surplus materials/equipment can be used in future operations they are classified as materials which can be re-used. Materials/equipment that cannot be reused in their

present form are surplus to requirements and need to be removed from site will be reused. The surplus products will be labelled, and storage area recorded for future reference.

Recycling

If surplus materials cannot be reused in their present form but could be used in a different form, they will be sent to recycling or labelled as future recycling i.e., damaged stock.

Residual Waste

Residual waste can come in several forms including:

- Waste that cannot be disposed of due to its category, class or material (e.g., computer components). Ways of reusing or disposing of the waste from the facilities need to found, and
- Unused machinery, spare parts, or discarded parts. All items of this nature will be identified and dated. These items will be assessed quarterly to gauge their importance for potential future use. Once an item is deemed to have little or no future potential to be utilized, it will be either assessed for reuse in another form or disposed of from the site.

Residual waste can be an eyesore, fire hazard and has potential to impact on the environment through leachates. All residual wastes will be identified, and new residual wastes will be added to the residual waste catalogue for quarterly auditing. Residual wastes that are deemed essential or have the potential for future use will be stored in a neat and tidy manner and where possible under cover to avoid or reduce the potential for further corrosion or damage to the product.

Landfill

If the above options cannot be satisfied, then the only alternative left is to send the surplus materials to landfill.

WASTE COLLECTION

General Waste (food, cardboard, plastics, food packing and supply packaging etc.)

Waste segregation will be practiced at source in every facility and waste bins will be used to store waste.

Old Batteries

Storage of old batteries will be held to an absolute minimum at the schools or education facilities. They should be stored within impervious bunds. Adequate absorption materials shall be readily available to collect and recover any liquid leakages from the batteries.

Contaminated / Hazardous Wastes

All materials generated from the end of life of electronic equipment, computers and laptops will be fully evaluated for potential contamination and staff should note if hazardous materials or conditions are found which may include the following:

- Toxic or contaminated materials,
- Radiation or radioactive materials,
- Noxious or explosive chemicals,

Depending on the type of material and the danger level of the material, storage and handling procedures may be required.

WASTE MINIMIZATION

Wastes from operations have the potential to impact on the environment. The Waste Management Plan has been developed to manage the risk associated with the potential impacts including minimizing waste generation.

The Ministry of Education and Training will implement all possible waste minimization procedures and therefore reduce the amount of waste to be removed from schools and education facilities. Management, staff, design teams, and suppliers will all be encouraged to look at ways to minimize the amount of waste generated at the schools and education facilities.

INDUSTRY BEST PRACTICE

The ministry will follow industry best practice guidelines in handling e-wastes, such as:

- Waste materials will be reduced, reused, and recycled where possible,
- Lease infrastructure removed from the lease will be returned to shore for processing, recycling or disposal,
- General wastes will be returned to shore for processing or disposal,
- All sewage wastes will be contained on service vessels in onboard holding tanks or chemical toilets and disposed of through an approved vessel sewage

discharge point on return to port, and

- Residual materials that cannot be reused or recycled will be disposed of at an approved waste management facility.

The MoET will be responsible for ensuring the instruction of workers and suppliers follow the requirements of the Waste Management Plan during induction processes. The induction relating to waste management will include advice on appropriate separation, handling, recycling, reuse methods to be used by all parties conducting operations at schools were applicable.

TRAINING

The Ministry recognizes the need for staff and pupils to be appropriately trained in the tasks that they are to undertake to reduce the chance of wastes being produced.

MONITORING

The monitoring of wastes generated will provide an opportunity to review the wastes being generated and ways in which they can be reduced. The ministry is committed to minimizing the risks associated with the generation of wastes in the operation of the facilities. The monitoring of the quantity and types of wastes being generated by the operations will be recorded in the wastes logbook and always kept at each school so that regular reviews can be undertaken.

All products that are of a concern in relation to the waste being generated will be replaced where possible for products that are less wasteful and/or considered to be environmentally friendly.

The MoET will continue to review the type of surplus materials produced and where possibly change the operations to minimize products that go to landfill. Recycling or reuse of wastes are a priority.

The Waste Management Plan and its importance will be communicated all learning facilities regularly. Project wide updates including improved recycling amounts will be communicated and discussed at management meetings.

ANNEX M: COVID-19 CONSIDERATIONS IN PROJECTS

INTRODUCTION

This interim note is intended to provide guidance to civil works teams on how to address key issues associated with COVID-19 and consolidates the advice that has already been provided. The Ministry of Education and Training (MoET) will implement this COVID-19 Preparedness Plan with the involvement of the Ministry of Health (MoH). The MoET will implement material measures and actions so that the project is implemented in accordance with the Environmental and Social Standards (ESSs). The ministry is responsible for compliance with all requirements of this developed plan.

COVID-19 SPECIFIC OCCUPATIONAL HEALTH AND SAFETY

These provisions will apply for: **Direct workers, contracted workers, and community workers.**

a) The health conditions of the workers shall be assessed prior to engaging them in the Project, and sick workers will be refused entry to the office premises;
b) Entry/exit to site or the workplace shall be minimized, and measures should be put in place to limit contact between workers and the community/general public;
c) Staff shall be trained on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms;
d) Trainings for workers on hygiene and other preventative measures shall be carried out, and a communication strategy for regular updates on COVID-19;
e) Adjustments should be made to work practices to reduce the number of workers and increase social distancing;
f) Procedure to follow if a worker becomes sick (following WHO guidelines), shall be instituted and followed;
g) Adequate supplies of PPE (masks); hand washing facility, soap and/or alcohol-based sanitizer, shall be made available at the office premises/worksites;
h) A separate enclosed space shall be allocated for isolation if a worker is found to be suspected of infection until that person is directed to a medical facility for treatment;

While preparing the site-specific plans involving labour, the following guidance materials will be used:

- WHO IPC interim guidance: For guidance on infection prevention and control (IPC) strategies for use when COVID-19 is suspected.
- WHO interim guidance on use of PPE for COVID-19: For rational use of PPE.

- WHO guidance getting your workplace ready for COVID-19: For workplace-related advice.
- WHO interim guidance: For guidance on water, sanitation and health care waste relevant to viruses, including COVID-19.

Worker(s)' Obligation

Every worker is obligated to comply with measures introduced by the World Health Organization. Noncompliance shall not be tolerated.

Procurement

The following items will be procured in all the appointed sites:

- Hand sanitizer with at least a 70% alcohol content and in accordance with recommendations of the Department of Health
- Facemasks
- Disinfects
- Infra-red thermometers

Management of Employees who have Contracted COVID-19

Any person with COVID-19 will not be permitted to return to work until a medical Practitioner clears that employee to do so. Persons under investigation for COVID-19 should not return to work at the project site until cleared by test results. During this time, they should continue to be paid daily wages. Also, if project workers live at home, any worker with a family member who has a confirmed or suspected case of COVID-19 should be quarantined from the project site for 14 days, and continued to be paid daily wages, even if they have no symptoms.

Eswatini Emergency Contact