Republic of Zambia

GIRLS' EDUCATION AND WOMEN'S EMPOWERMENT AND LIVELIHOODS FOR HUMAN CAPITAL PROJECT (P181391)

ENVIRONAMENTAL AND SOCIAL MANAGEMEN PLAN (ESMP)

GENDER DIVISION, MINISTRY OF COMMUNITY DEVELOPMENT AND SOCIAL SERVICES, MINISTRY OF EDUCATION, MINISTRY OF HEALTH

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ACRONYMS

8NDP	Eighth National Development Plan
ACC	Area Coordinating Committees
AM	Accountability Mechanism
BCP	Business Continuity and Disaster Recovery Plan
CBV	Community-Based Volunteer
CDF	Constituency Development Fund
CMS	Case Management System
COVID-19	Corona Virus Disease 2019
CPF	Country Partnership Framework
CWAC	Community Welfare Assistance Committees
DCDO	District Community Development Officer
DDCC	District Development Coordinating Committee
DDMU	Disaster Management and Mitigation Unit
DEBS	District Education Board Secretary
DHS	Demographic and Health Survey
DSW	Department of Social Welfare
DSWO	District Social Welfare Office
DWAC	District Welfare Assistance Committee
E&S	Environmental and Social
EFA	Education for All
EHSG	Environmental Health and Safety Guidelines
EMA	Environmental Management Act
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
FSP	Food Security Pack
GBV	Gender Based Violence
GDP	Gross Domestic Product
GEWEL	Girls Education and Women's Empowerment and Livelihoods
GEWEL 2	Girls' Education and Women's Empowerment and Livelihoods for Human Capital Project
GFF	Global Financing Facility for Women, Children and Adolescents
GMP	Growth Monitoring and Promotion
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
GRZ	Government of the Republic of Zambia
HGSM	Home-Grown School Meals
ICT	Information and Communication Technology
ISM	Implementation Support Mission
ISSB	Institutional Strengthening and Systems Building for Cash 'Plus' Delivery
IT	Information Technology
KGS	Keeping Girls in School and Beyond
LBS	Life and Business Skills
LCMS	Living Conditions and Monitoring Survey
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation

MCDSS	Ministry of Community Development and Social Services
MDTF	Multi-donor Trust Fund
MIS	Management Information System
MLGRD	Ministry of Local Government and Rural Development
MMS	Multiple Micronutrient Supplementation
MNP	Micronutrient Powder
MoA	Ministry of Agriculture
MoE	Ministry of Education
MoH	Ministry of Health
MSME	Ministry of Small and Medium Enterprises Development
NDC	Nationally Determined Contribution
NDP	National Development Programme
NFNC	National Food and Nutrition Commission
NGO	Nongovernmental Organization
OHS	Occupational Health and Safety
PDO	Project Development Objective
PHC	Primary Health Care
PIU	Project Implementation Unit
PLR	Performance and Learning Review
PPE	Personal Protective Equipment
PPM	Pay Point Managers
PS	Permanent Secretary
PSC	Project Steering Committee
PSWO	Provincial Social Welfare Office
PTA	Parents Teachers Association
PTC	Project Technical Committee
PWDs	Persons with Disabilities
RMNCAH-N	Reproductive Maternal, Newborn, Child and Adolescent Health - Nutrition
SADC	Southern African Development Community
SCT	Social Cash Transfer
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SP	Social Protection
SRGBV	School-Related Gender-Based Violence
SWL	Supporting Women's Livelihoods
TA	Technical Assistance
TCLC	Tripartite Consultative Labour Council
ToR	Terms of Reference
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
WASH	Water, Sanitation, and Hygiene
ZAMSTAT	Zambian Statistics Agency
ZEMA	Zambia Environmental Management Agency
ZISPIS	Zambia Integrated Social Protection Information System
ZMW	Zambian Kwacha

EXECUTIVE SUMMARY

1. Introduction

The Environmental and Social Management Plan (ESMP) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank. This ESMP follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of Zambia.

The Girls' Education and Women's Empowerment and Livelihoods Project for Human Capital Project (GEWEL 2) is a US$157 million equivalent financing in support of four components, to be implemented over a four-year period implemented by various government ministries overseen by the Gender Division. Project activities will be implemented nationwide in 10 provinces and 116 districts of the country. The components are: (a) Foundational Social Cash Transfer and Nutrition under Ministry of Community Development and Social Services (MCDSS) and WASH rehabilitation under the Ministry of Health (MoH); (b) Keeping Girls in School and Beyond (KGS) under the Ministry of Education (MoE); (c) Supporting Women's Livelihoods (SWL) for Climate-Smart Productive Inclusion the MCDSS; and (d) Institutional Strengthening and Systems Building for Cash 'Plus' Delivery under the MCDSS. The Project Development Objective (PDO) is to promote human capital development and productivity among poor and vulnerable girls and women, while strengthening adaptive social protection delivery systems. Foundational SCT (Subcomponent 1.1) will continue to be implemented nationally in all 116 districts, while complementary interventions on KGS (Component 2) and SWL (Component 3) will also be gradually expanded nationally to ensure that the full potential of the cash 'plus' approach is realized.

2. Purpose of ESMP and Methodology used for E&S risk and impacts identification

The ESMP aims to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and the Zambian national requirements. This ESMP should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), the Labour Management Procedures (LMP), the Security Management Plan, the Grievance Redress Mechanism, the Gender Based Violence (GBV) Action Plan, the Hazardous Waste Management Plan, the Electronic Waste Management Plan and the Integrated Pest Management Plan.

The ESMP preparation involved collecting secondary data on the environmental and social situation, consultations with stakeholders and data analysis. It followed a typical process of establishing the current baseline conditions, identifying specific environmental and social risks that need to be addressed, characterization of the effects the project will have and the impacts (positive or negative) they will result in. It also determined the significance of the issues identified, establish mitigation and monitoring measures, and finally proposals for management plans to ensure effective implementation of mitigation and management of the anticipated issues. Data was collected through review of literature and stakeholder interviews. Interviews were held with representatives/ E&S focal point persons from MoH, MoE, MCDSS and Gender Division between July and August, 2024. Key documents reviewed included:

- The Project Appraisal and Project Implementation documents
- Appraisal Environmental and Social Review Summary
- The Project Environmental and Social Commitment Plan
- Project Implementation Manual
- GEWEL project: Challenges and Lessons Learnt
- GEWEL Harmonised Grievance Mechanism manual
- The project Final Stakeholder Engagement Plan
- World Bank Environmental and Social Framework

3. Positive social economic impacts and enhancement measures

The summarised identified potential positive impacts are indicated below:

Component 1: SCT Activities

- Human capital development
- Improved nutrition outcomes among poor children and women
- Improved well-being and poverty reduction
- Enhanced social inclusion
- Local economic growth

WASH Facilities Rehabilitation

- Improved health outcomes
- Women and girls' empowerment
- Improved water and sanitation management

Component 2: KGS Activities

- Increased school enrolment and attendance for girls
- Enhanced educational attainment at the upper primary and secondary school level by vulnerable adolescent girls

Component 3: SWL Activities

- Increased earnings and economic inclusion of adult women to build climate adaptation
- Economic empowerment
- Improved food security
- Gender equality
- Community cohesion

4. Negative E&S risks and impacts

Some program activities may pose some E&S risks and impacts generally of moderate risks. The identified negative environmental and social risks and impacts include:

Component 1: SCT Activities

- Security risks including theft, physical attacks, death, robbery, fraud, and cybersecurity risks
- Dependency risk including reduced work incentive and intergenerational reliance
- Social conflicts including tensions over beneficiary selection, intra-household conflicts
- Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Risks including domestic violence, exploitation, and abuse
- Increased consumption and solid waste generation
- Generation of e-waste composed of disposal of outdated digitization devices
- Labour risks such as exploitative labour practices, child labour risks
- Exclusion of vulnerable groups and barriers to access and exclusion errors
- Agrochemical exposure and water pollution due to increased use of fertilizers and pesticides, water contamination

Rehabilitation of WASH facilities

- Disruption of services with temporary shutdown of services
- Labour risks, unsafe work conditions and risk of child labour
- Social exclusion risks with limited access for vulnerable groups
- Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Risks: Risk of harassment or abuse
- Construction solid and hazardous waste generation of construction debris and hazardous waste
- Hazardous waste risks including exposure to sewerage, asbestos, lead, or old medical waste
- Construction OHS risks
- Air and noise pollution from works
- Biodiversity loss and soil erosion due to clearing and soil disturbances
- Material sourcing risks from unsustainable material extraction

Component 2: KGS Activities

- Increase in biohazard waste, menstrual reusable sanitary towels final disposal and contaminated water
- Exclusion of vulnerable families and conflicts
- Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Risks to girls

Component 3: SWL Activities

- Increased workload for women. Double burden from household and agricultural duties
- Social resistance and cultural opposition to gender role changes
- Land degradation including soil erosion, deforestation, and loss of biodiversity due to increased agriculture activities
- Agrochemical exposure and water pollution. Health risks and water contamination from chemicals
- Exclusion of vulnerable groups: Marginalization of disabled, elderly, or poorer women

- Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Risks with increased risk of violence or exploitation

The negative environmental and social risks and impacts are expected to be temporary, moderate risk, site-specific, reversible, and mitigated through the ESF and ESMP.

5. Mitigation measures

Component 1: Social Cash Transfer and Nutrition Intervention

Risk	Mitigation measure
Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	• Active implementation of the LMP (Annex 4), SEP and the GRM (Annex 2) • Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways • Dedicated ESS and GBV/SEA experts will be recruited/ assigned within the implementing agencies • Training staff, establishing clear policies
Exclusion of Vulnerable Groups	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media • Design targeted programs to ensure equitable distribution of cash transfers
Labor including forced/trafficked and or child labour	• A Labour Management Procedure (LMP) has been developed to address the OHS and labour issues relating to direct and contracted workers and community volunteers (see Annex 4)
Security Risks	• A Security Management Plan has been developed (see Annex 3) which articulates mitigations measures including: (i) examine vulnerabilities (ii) limiting the amount of cash carried by any one PPM (iii) PPM security protocols and emergency training iv) implement secure methods for cash distribution, such as digital transfers (ix) establish partnerships with local law enforcement, amongst others.
Occupational Health Safety and Security Risks (OHS)	• Promote work-life balance and provide access to health services and mental health support. Encourage practices that prioritize women's well-being and safety. • Implement comprehensive occupational health and safety (OHS) training for the women. Establish safety protocols and use of PPE. • Provide training on handling and storage of hazardous materials.
Increased Consumption and Generation of Solid Waste	• Provide training and encourage sustainable consumption practices among beneficiaries • Promote more sustainable practices in agriculture techniques. Encourage the use of renewable energy sources to prevent deforestation for charcoal.
Chemical, pesticide and fertilizer use risks	• Provide training on the use of integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Use targeted selective pesticides and promote biodiversity. • Provide training to women on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures.

Component 1: Social Cash Transfer and Nutrition Intervention/ WASH Infrastructure Rehabilitation

Risks	Mitigation measure
Construction risks	• Complete the E&S screening form and update the ESMP, if necessary
Waste generation	• Implement effective waste prevention, reduction, recycling, and disposal practices during construction and operation. • Implement segregation of waste and proper disposal of each waste type. • Dispose of inert waste at the local designated disposal site in conjunction with the local council. • Identify and safely handle hazardous waste from decommissioned sanitation facilities, using ZEMA certified hazardous waste disposal companies to ensure safe and compliant disposal.
Material sourcing risks	• Source raw materials from sustainable suppliers. • The project will not open any new borrow pits.
Disruption of operations at the facility	• Plan and implement the rehabilitation in phases to minimize disruptions to Primary Health Care (PHC) facility operations.
OHS risks	• Implement on-site OHS management measures to promote occupational and public health. • Use safety signage • Use appropriate PPE
Biodiversity loss and soil erosion	• Implement measures to control erosion and sediment runoff, such as silt fences, sediment traps, and vegetation cover, to protect nearby water bodies and soil quality. Limit vegetation clearing to rehabilitation sites only. Rehabilitate open areas at decommissioning.
Noise and Air quality loss	• Dust Suppression by regularly spray water construction areas and materials. • Install physical barriers, such as dust screens, enclosures for specific areas, demolition sites or material storage. • Ensure noise levels do not exceed acceptable levels for a heath facility (75db). Install noise barriers around noisy equipment and sites. • Select and use equipment designed to operate at lower noise levels. Regularly service machinery to prevent excessive noise. • Schedule noisy activities during times when health facility operations are minimal or less sensitive. • Use clear signage to inform health staff and patients about construction activities and potential OHS risks.

Component 2: Keeping Girls in School and Beyond

Risk	Mitigation measure
(GBV/SEA/SH)	• Active implementation of the SEP and the GRM (Annex 2)

	• Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways
Exclusion of Vulnerable Groups	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media • Design targeted programs to ensure equitable distribution of benefits
Solid waste generation	• Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting.
Hazardous waste	• Educate the pupils on efficient washing practices to minimize water use. Ensure that users have access to sufficient clean water and sanitation facilities. • Include private, safe, and hygienic spaces for washing and drying sanitary towels. • Ensure comprehensive education on the proper hygiene, safe disposal practices and set up designated collection points for biohazard waste and used cleaning water. • Promote biohazard waste management system to handle blood contaminated water and materials • Collaborate with local authorities and MoH to ensure that wastewater treatment facilities can handle blood-contaminated water. • Promote the use of bio-digesters or similar technologies for on-site treatment in rural areas; a designated well-constructed soak pits where the blood water can be treated/ disinfected water before disposal.

Component 3: Supporting Women's Livelihoods for Climate-Smart Productive Inclusion

Risk	Mitigation measures
GBV/SEA/SH	• Active implementation of the LMP (Annex 4), SEP and the GRM (Annex 2) • Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways • Dedicated ESS and GBV/SEA experts will be recruited/ assigned within the implementing agencies • Training staff, establishing clear policies
Exclusion of Vulnerable Groups	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media • Design targeted programs to ensure equitable distribution of cash transfers
Labor including forced/trafficked and or child labour	• A Labour Management Procedure (LMP) has been developed to address the OHS and labour issues relating to direct and contracted workers and community volunteers (see Annex 4)
Occupational Health Safety and Security Risks (OHS)	• Promote work-life balance and provide access to health services and mental health support. Encourage practices that prioritize women's well-being and safety. • Implement comprehensive occupational health and safety (OHS) training. Establish safety protocols and use of PPE.

	• Provide training on handling and storage of hazardous materials. • Implement regular health checks
Waste generation	• Conduct education campaigns to address myths and stigmas about menstruation. • Partner with manufacturers committed to sustainable practices, and quality products. • Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting. • Implement waste management practices. • Set up collection points for used chemical containers and work with waste management companies or the manufacturers of the chemicals. • Provide training on safe handling and disposal procedures. • Provide training on the responsible use and maintenance of digital devices to minimize damage and extend their usable life. • Establish e-waste collection points in communities to ensure that faulty electronic devices are properly recycled.
Chemical, pesticide and fertilizer use	• Provide training on the use of integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Implement buffer zones and proper waste disposal practices to prevent contamination. • Use targeted selective pesticides and promote biodiversity. • Provide training on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures.

6. ESMP implementation arrangement

The PIU will maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the project including a qualified Environmental and Social Specialist and resources to support the management of ESHS risks and impacts of the Project at the provincial and local community levels. The project will maintain existing PIUs established under the Girls' Education and Women's Empowerment and Livelihoods (GEWEL) project and establish and maintain additional PIUs (MoH and Gender Division) under GEWEL 2 as set out in the Financing Agreement. The existing PIUs will maintain current E&S specialists. The MoH shall assign an Environmental and Social Specialist. The contractors engaged and sub-contracted entities on site will have an E&S Officer and an HSE officer to implement the ESMP measures, monitored by the relevant PIU E&S Specialists.

7. Stakeholder consultation and Information disclosure

A Stakeholder Engagement Plan (SEP) has been prepared to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project. The SEP is linked to a Grievance Redress Mechanism.

8. Conclusion and recommendations

In conclusion, the Environmental and Social Management Plan (ESMP) for the GEWEL 2 components outlines a comprehensive approach to mitigating potential environmental and social risks while maximizing the program's benefits for vulnerable populations. The negative impacts and risk are moderate and manageable. By incorporating robust stakeholder engagement, monitoring mechanisms, and clear mitigation strategies, the ESMP ensures that the program adheres to environmental and social safeguards requirements of the nation and of the World Bank's ESF. This plan fosters transparency, reduces negative impacts, and promotes sustainable development, thereby aligning the program's components with both national regulatory requirements and international best practices. Ultimately, effective implementation by the responsible institutions of the ESMP will enhance the program's positive outcomes while safeguarding the environment and community well-being. This ESMP provides a comprehensive framework to manage environmental and social impacts while maximizing the positive outcomes of each component taking into consideration the national regulatory requirements, World Bank ESF and good international industrial practices. Successful implementation of the mitigation measures, regular monitoring, and active stakeholder participation will ensure that the objectives of GEWEL 2 and ESS standards are met

1. INTRODUCTION

1.1. Project Background and Need

The Environmental and Social Management Plan (ESMP) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank. This ESMP follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of Zambia. The ESMP aims to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. This ESMP should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), the Labour Management Procedures (LMP), the Security Management Plan, the Grievance Redress Mechanism, the Gender Based Violence (GBV) Action Plan, the Hazardous Waste Management Plan, the Electronic Waste Management Plan and the Integrated Pest Management Plan.

The Girls' Education and Women's Empowerment and Livelihoods Project for Human Capital Project (GEWEL 2) is a US$157 million equivalent financing in support of four components, to be implemented over a four-year period. Project activities will be implemented nationwide in 10 provinces and 116 districts of the country. The components are: (a) Foundational Social Cash Transfer and Nutrition; (b) Keeping Girls in School and Beyond (KGS); (c) Supporting Women's Livelihoods (SWL) for Climate-Smart Productive Inclusion; and (d) Institutional Strengthening and Systems Building for Cash 'Plus' Delivery. Of the total project amount, US$150 million will be from IDA and US$7 million will be from the Global Financing Facility for Women, Children and Adolescents (GFF).[1] The proposed project will build on the results achieved and lessons learned from the design and implementation experience of the first phase of GEWEL to promote greater productivity and human capital growth.

1.2. Project Objectives

Project Development Objective (PDO) Statement

To promote human capital development and productivity among poor and vulnerable girls and women, while strengthening adaptive social protection delivery systems. The human capital development aspect of the PDO will be measured through results in three interrelated areas: (a) the SCT as the foundational national social assistance program as an enabler for human capital development, with complementary activities aimed at (b) enhanced educational attainment at the upper primary and secondary school level by vulnerable adolescent girls; (c) improved nutrition outcomes among poor children and women in selected districts. Productivity will be measured through activities aimed at increasing earnings and economic inclusion of adult women to build

[1] The GFF is a country-led multi-stakeholder partnership housed at the World Bank committed to ensuring all women, children, and adolescents can survive and thrive. The GFF is supporting investments to strengthen essential health and nutrition services at community and primary care levels, as well as enhance service quality and resilience, with a focus on data, quality, equity, results, and domestic resources for health.

climate adaptation and shock resilience, while strengthened adaptive SP systems will track results in ensuring effective and accountable delivery of services, with response to climate-induced and other shocks in mind.

PDO Level Indicators

The progress toward achievement of the PDO will be specifically measured by the following outcome indicators:

(a) Promote human capital development: Percentage of children living in households receiving the SCT nutrition cash top-up that achieve a minimum dietary diversity. Percentage of KGS girls retained in school.

(b) Promote productivity among women: Percentage of eligible SWL beneficiaries with an ongoing income-generating activity one year after SWL has ended.

(c) Strengthened adaptive social protection delivery systems: Dynamic Social Registry established and institutionalized.

1.3. Project Beneficiaries

Selection of project beneficiaries. With the current financing, GEWEL 2 will support 1.5 million households, about 66 percent of the poor,[2] under the foundational SCT (Subcomponent 1.1), of which 25,000 will also benefit from the nutrition cash-top ups. Nutrition-Specific Activities (Subcomponent 1.2) will be more broadly targeted to all households and community members in the selected districts, with priority given to those SCT households receiving the nutrition cash top-ups. Further, 107,321 adolescent girls will be supported under KGS (Component 2), and 58,000 women will be supported under SWL (Component 3). SCT beneficiaries will include those already being supported, as well as new households selected using the targeting criteria established in the revised SCT guidelines,[3] while nutrition cash top-ups will be provided to existing SCT households with pregnant or lactating women and children under two years of age.

Selection of project locations. Foundational SCT (Subcomponent 1.1) will continue to be implemented nationally in all 116 districts, while complementary interventions on KGS (Component 2) and SWL (Component 3) will also be gradually expanded nationally to ensure that the full potential of the cash 'plus' approach is realized. However, nutrition interventions will follow a convergence approach, such that all nutrition-sensitive and nutrition-specific activities under Component 1, along with the planned nutrition activities under Components 2 and 3, will be implemented in the same districts. Specifically, nutrition-sensitive activities (Subcomponent 1.1) will be implemented in four districts, while nutrition-specific activities (Subcomponent 1.2) will be implemented in two of those four districts, with exact districts to be determined based on pre-agreed selection criteria.[4]

2. ESMP STUDY METHODOLOGY

2.1. Introduction

The ESMP preparation involved collecting secondary data on the environmental and social situation, consultations with stakeholders and data analysis. It followed a typical process of establishing the current baseline conditions, identifying specific environmental and social risks that need to be addressed,

[2] Calculations by the World Bank based on 2022 census data and 2022 LCMS survey data.

[3] Beneficiaries of the SCT include poor households with (a) older persons aged 60 years and above, (b) a member who is chronically ill and on treatment, (c) pregnant or breastfeeding women/adolescent and/or with children below 2 years, a new category on the program yet to be implemented, (d) Female headed households with at least three dependents under the 18 years of age, and (e) persons with disabilities (PWD).

[4] The selection criteria will prioritize climate disaster prone (i.e., drought) areas and those with high malnutrition. Exact criteria will be agreed during implementation.

characterization of the effects the project will have and the impacts (positive or negative) they will result in. It also determined the significance of the issues identified, established mitigation and monitoring measures, and finally proposals for management plans to ensure effective implementation of mitigation and management of the anticipated issues. The approach and methodology chosen ensures that applicable National regulations and World Bank Environmental and Social Standards (ESS) processes have been followed and will be described in detail where applicable in consideration to identified environmental and social risks and impacts of GEWEL 2.

2.2. Literature review

This included studying relevant documents including the project proposals and appraisals, legislation, and policies; national and local secondary data sources; and other reports and documents related to the proposed project including the World Bank Environmental and Social Frameworks and Environmental and Social Impact Assessments (ESIA) and associated guidelines. Key documents reviewed included:

(a) The Project Appraisal and Project Implementation documents
(b) Appraisal Environmental and Social Review Summary
(c) The Project Environmental and Social Commitment Plan
(d) Project Implementation Manual
(e) GEWEL project: Challenges and Lessons Learnt
(f) GEWEL Harmonised Grievance Mechanism manual
(g) The project Final Stakeholder Engagement Plan
(h) World Bank Environmental and Social Framework
(i) Gender Policy

2.3. Environmental and Social Baseline

Environmental and social baseline comprised secondary data collected through review of literature and stakeholder interviews. Interviews were held with representatives/ E&S focal point persons from MoH, MoE, MCDSS and Gender Division between July and August 2024.

2.4. Impact Identification and Mitigation Measures

The primary tool for identification of impacts and mitigation was using expert judgment and consultations including recommendations from stakeholders. Impacts were identified from the environmental and socio-economic reviews guided by the World Bank Environmental and Social Standards. Impact assessments were also based on criteria developed from national legal frameworks and World Bank Environmental and Social Standards and Good International Industry Practices (GIIPs), and Environmental Health and Safety Guidelines (as discussed in Chapter 3).

3. LEGAL AND POLICY FRAMEWORKS

1.1. Social Protection in Zambia

Zambia has a strong policy environment and commitment level to social protection as highlighted in its National Social Protection Policy 2014-2018 (NSPP) which provides a broad framework within which social assistance programs operate. The policy's objectives include reducing poverty, boosting food security, and building human capital. In 2019, the Integrated Framework of Basic Social Protection Programs (IFBSP) fostered the existing social protection policy to move the sector: (a) in the direction of layering basic social assistance together with livelihoods and empowerment programmes to achieve greater impact; and (b) from programming in silos to a more complementary and comprehensive approach to reducing extreme poverty and promoting human capital development.

The foundation of this approach is the Social Cash Transfer (SCT), which provides regular cash transfers to assist extremely poor and vulnerable households' consumption and enables them to make human capital and livelihoods investments through empowerment interventions. NSPP set targets to scale-up the SCT program to all districts nationally by 2016—a target that the government managed to achieve by 2017. The Seventh National Development Plan (7NDP) reinforced the NSPP with targets to increase social assistance coverage from 40 percent to 70 percent of the poor, and spending from 0.7 percent to 1.7 percent of GDP. The Eighth National Development Plan (8NDP) for 2022-2026 further outlines social protection and human development as one of the four key pillars of government's development strategy.

While the newly elected government is committed to undertaking macroeconomic reforms, the government's fiscal space is strained making the government's ability to finance and scale up safety nets transfer payments to the poorest constrained in the immediate term. Nonetheless, the World Bank has increased its investment and lending in the social protection sector in Zambia in a major way in recent years, resulting in a large scale up of support to the poorest and most vulnerable. The Bank's current lending operation in the social protection sector in Zambia is the Girls Education and Women's Empowerment and Livelihoods (GEWEL) project (P151451), a cash plus social protection program that supports the poorest families in Zambia with cash transfers and layers additional interventions to empower girls from those families to complete their secondary education, and support women in starting their own small businesses.

Relevance to Higher Level Objectives

The proposed Girls' Education and Women's Empowerment and Livelihoods for Human Capital Project (GEWEL 2) is closely aligned with the Government's development priorities, in recognition of the interrelation between human capital and economic productivity**.** The National Long-Term Vision 2030 sets the goal for Zambia to become a prosperous middle-income nation by 2030 by, among others, improving gender-responsive sustainable development and strengthening SP to protect the poor and vulnerable from risks and shocks. The 8NDP acknowledges that the expansion of SP programs has contributed to poverty and vulnerability reduction and emphasizes that human development is crucial for inclusive development and the transformation of the country.

GEWEL 2 is also in line with the World Bank's current Country Partnership Framework (CPF, FY19–23) for Zambia, extended through FY24 in its Performance and Learning Review (PLR), as well as the upcoming CPF (FY25–30)

Specifically, the proposed project contributes to the achievement of CPF Objective 2.1 under Focus Area II "Improve access to secondary education, health services, nutrition and social protection, with attention to girls and women in selected rural areas." This objective has been streamlined in the PLR to "Objective 3: Increased access to health, education and social protection." GEWEL 2 will directly contribute to these goals by protecting the poor and building their resilience to climate and other shocks, enhancing girls' access to education, and promoting greater women's productivity, while serving as an entry point on nutrition and strengthening accountable and effective SP delivery systems for institutional sustainability. GEWEL 2 is expected to be aligned with the upcoming CPF expected at the end of FY24 given its anticipated strong focus on human capital growth and climate adaptation for poverty reduction and growth.

The GEWEL 2 is aligned with the World Bank's new mission and regional strategies. It is broadly aligned with the World Bank's mission, focusing on evolution priorities of food and nutrition security and climate change adaptation and mitigation. GEWEL 2 is also fully aligned with the World Bank Eastern and Southern Africa priorities in terms of investments in people, digital economies, and climate change mitigation and adaptation. Moreover, the project will support corporate commitments in the global World Bank Group Gender Strategy (2024-2030) to be formally launched in 2024 related to gender gaps in endowments, inclusion, resilience and GBV.

Likewise, GEWEL 2 aligns with Zambia's climate change strategy and the country's Nationally Determined Contribution (NDC) to Paris Agreement. Zambia aims to become a prosperous low-carbon and climate-resilient middle- income country by 2030. The updated NDC in 2021 sets a mitigation goal of reducing greenhouse gas emissions by 25 percent by 2030, with the potential for a 47 percent reduction with substantial international support. Thus, adaptation to climate change, including through safety nets, is a priority for enhanced resilience in population, ecosystems, infrastructure, and health systems. GEWEL 2 will contribute to these goals by maintaining the national safety net program, while strengthening girls' and women's resilience, as they are often most vulnerable to climate change impacts, by facilitating climate resilient and diversified livelihoods and increased income to avoid climate-harmful coping mechanisms.

1.2. National Policy Framework -

Three main environmental and social policies are identified below with their relevance to the GEWEL 2 and the compliance requirements thereof.

3.1.1. National Policy on Environment (NPE) of 2007

To provide a framework for sustainable environmental management and to promote the integration of environmental considerations into sectoral policies. This National Policy on Environment is a nationwide cross-sectoral document aiming at creating a comprehensive framework for effective natural resource utilization and environmental conservation supporting the Government's development priority to eradicate poverty and improve the quality of life of the people of Zambia. To achieve the overall goal of the Policy, a number of specific objectives have been set out as follows (i) promote protection and management of environment and natural resources, balancing the needs for social and economic development and environmental integrity, while keeping adverse activities to the minimum; (ii) manage the environment by linking activities, interests and perspectives of all groups, including people, non-governmental organizations and government at both the central and decentralized local levels; (iii) accelerate environmentally and economically sustainable growth in order to improve the health, sustainable livelihoods, income and living conditions of the poor majority with greater equity and self-reliance; (iv) ensure environmental awareness and commitment to enforce environmental laws and to the promotion of

environmental accountability; (v) build individual and institutional capacity to sustain the environment; (vi) regulate and enforce environmental laws; and (vii) promote the development of sustainable industrial and commercial processes having full regard for environmental integrity.

Key Areas:

(a) Sustainable land management
(b) Conservation of biodiversity
(c) Water resource management
(d) Pollution control and waste management
(e) Climate change adaptation and mitigation

Relevance: sustainable environmental management plans are required on GEWEL 2. The policy uses an integrated approach that links intervention measures (institutions, legislation, environmental planning, EIA and monitoring, awareness, private sector and community participation, human resource development and research, gender, youth and children, demographic planning, human settlements and health, air quality and climate change, biodiversity and bio-safety, land tenure and use, trans-boundary and regional conservation) to the various economic sectors.

Compliance: the GEWEL 2 has prepared the ESMP to identify the risks and impacts as well as mitigation measures to be implemented.

1.2.1. National Forestry Policy of 2014

To ensure the sustainable management of forest resources to prevent deforestation and forest degradation.

Key Areas:

(a) Conservation and reforestation efforts
(b) Promotion of sustainable forest management practices
(c) Support for community forestry and agroforestry initiatives
(d) Protection of forest biodiversity

Relevance: GEWEL 2 activities are likely to directly interact with forests e.g. agriculture under SCT and SWL and land clearing or poor waste disposal practices.

Compliance: the ESMP covers sustainable forest management and promotes reforestation and conservation efforts.

1.2.2. National Agriculture Policy of 2012-2030

To promote sustainable agricultural practices that minimize environmental degradation.

Key Areas:

(a) Conservation agriculture

(b) Integrated pest management
(c) Soil and water conservation
(d) Climate-resilient farming methods

Relevance: GEWEL 2 will include SWL's extensive agriculture activities and will use pesticides and fertilisers. Empowering women through agriculture can have significant environmental impacts, including deforestation, soil degradation, water resource depletion, and increased pesticide use.

Compliance: the ESMP has measures that promote the sustainable agricultural practices, including conservation agriculture, integrated pest management, IPM and soil conservation. Support sustainable agricultural growth and food security, emphasizing the inclusion of women and small-scale farmers in agricultural empowerment initiatives.

1.2.3. National Biodiversity Strategy and Action Plan (NBSAP) of2025-2025

To conserve Zambia's biological diversity and promote the sustainable use of natural resources.

Key Areas:

(a) Conservation of wildlife and protected areas
(b) Management of invasive species
(c) Ecosystem restoration
(d) Involvement of local communities in biodiversity conservation

Relevance: GEWEL 2 includes the SCT and SWL's activities on land that interact with natural resources and biodiversity.

Compliance: the ESMP includes the sustainable use of natural resources in the operation areas, including the control of invasive species during revegetation and farming.

1.2.4. National Climate Change Policy of 2016

To guide Zambia's efforts in addressing the impacts of climate change while fostering low-carbon development.

Key Areas:

(a) Climate change mitigation and adaptation strategies
(b) Promotion of climate-resilient agriculture
(c) Development of renewable energy resources

Implementation of climate risk assessments and early warning systems.

Relevance: GEWEL 2 incorporates the impacts and adaptation to climate change under SWL. It includes agriculture and social welfare sectors.

Compliance: the ESMP addresses the impacts of climate change and promotes climate-resilient development, including agriculture and social welfare sectors.

1.2.5. National Water Policy of 2010

The National Water Policy is the main policy framework for the water and sanitation sector in Zambia. The Policy was developed and adopted by the Government of the Republic of Zambia in 1994 and updated in 2010. The National Water Policy envisions "to optimally harnessing water resources for the efficient and sustainable utilisation of this natural resource to enhance economic productivity and reduce poverty." In order to achieve the national goal of increasing accessibility to reliable safe water by all sectors of the economy the policy addresses two broad categories of water resources management and development. The major outcome of the policy is to improve the management of water resources, institutional coordination and defined roles and responsibilities. The policy encourages the use of water resources in an efficient and equitable manner consistent with the social, economic and environmental needs of present and future generations.

Relevance: GEWEL 2 activities include the use of water resources and WASH rehabilitation. There may also be a likelihood of water pollution due to waste generation.

Compliance: the ESMP has incorporated sustainable and equitable use of water resources, and water pollution prevention.

1.2.6. National Waste Management Strategy of 2004

The overall goal of the National Waste Management Strategy is to improve the environmental quality of the Zambian environs through the development and implementation of an efficient and sustainable waste management system. The objectives of the national waste management strategy are to:

(a) Minimise generation of waste.
(b) Maximise the collection efficiency of waste.
(c) Reduce the volume of waste requiring disposal and maximise the economic value of waste.
(d) Develop and adopt environmentally sound treatment and disposal methods and practices.

Relevance: GEWEL 2's SCT, KGS and SWL activities may generate solid waste. Social cash transfer programs can lead to increased demand for goods and services, which may result in waste generation, changes in consumption patterns, and resource use, all of which have environmental implications.

Compliance: the ESMP includes and promotes the use of sustainable materials, proper waste management practices to reduce pollution, protect public health, and safeguard the environment. Sustainable materials use, proper waste disposal facilities, public awareness on hygiene, health risk management.

1.2.7. National Social Protection Policy of 2014

The National Social Protection Policy 2014-2018 (NSPP) provides a broad framework within which social assistance programs operate, highlighting the objectives of reducing poverty, boosting food security, and building human capital. NSPP, in fact, sets forth concrete targets to scale-up the SCT program to all districts nationally by 2016—a target that the government managed to achieve by 2017. The Seventh National Development Plan (7NDP) reinforced the NSPP with targets to increase social assistance coverage from 40 percent to 70 percent of the poor,

and spending from 0.7 percent to 1.7 percent of GDP. The forthcoming Eighth National Development Plan (8NDP) for 2022-2026 further outlines social protection and human development as one of the four key pillars of government's development strategy. In 2019, the Integrated Framework of Basic Social Protection Programs (IFBSP) built on existing social protection policy to move the sector in the direction of layering basic social assistance together with livelihoods and empowerment programming to achieve greater impact through focusing on complementary and comprehensive approaches to reducing extreme poverty and promoting human capital development.

Relevance: GEWEL 2 is fully a social protection focused program aimed at reducing vulnerability and enhancing social protection, particularly for the poorest and most marginalized populations.

Compliance: the ESMP and GEWEL 2 are built on existing social protection policy, layering basic social assistance together with livelihoods and empowerment programming to achieve greater impact through focusing on complementary and comprehensive approaches to reducing extreme poverty and promoting human capital development.

1.2.8. National Gender Policy of 2023

This Policy aims to accelerate the attainment of gender equity and equality and strengthens the coordination of an integrated and multi-sectoral approach in the implementation of gender programmes across all sectors. It enhances the participation of women in economic activities through, among others, creating an enabling environment that provides equitable access to productive and economic resources in conjunction with the private sector. This will enhance equitable distribution of opportunities and national resources between women and men, girls and boys for poverty reduction and national development. The Policy is aligned to the National Development Plans and Sustainable Development Goals (SDGs) as well as the Vision 2030 which aims at attaining a prosperous middle-income nation. The Policy is also aligned to the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW), Beijing Declaration and Platform for Action, SADC Protocol on Gender and Development, the African Charter on Human and People's Rights on the Rights of Women in Africa (Maputo Protocol) and other instruments.

Relevance: the GEWEL 2 activities focus on women and girls' empowerment, as well as challenges faced by these groups.

Compliance: the ESMP promotes the attainment of gender equality by redressing existing gender imbalances and supporting the women and girls as beneficiaries of the program. It promotes girls' education and mitigates against GBV/SEAH.

1.2.9. National Education Policy of 2022-2024

Zambia's Education Policy upholds the principle that every individual has an equal right to educational opportunity. The Government's commitment to education has been clear since it passed the 1964 Education Act governing the financing and management of education in Zambia. Education development has been among the Government's main priorities, as indicated by the stable share of government spending devoted to education, as well as successive education sector plans and associated policy reforms. Nonetheless, issues around need for

continuous improvements to access and equity, further enhancement of the quality and relevance, effectiveness and efficiency of the education system have been raised[5]. Through a Ministry of Education circular in December 2021, the Government highlighted that the provision of free education from early childhood to secondary education would start in January 2022, with the government paying tuition fees through a compensatory grant. The government also announced abolition of Parent Teachers Associations, examination, and tuition fees in all government schools, in a bid to eradicate key obstacles to accessing education for all.

Relevance: GEWEL 2 is promoting girls' education and keeping girls in school through KGS.

Compliance: the ESMP promotes the provision of reusable sanitary towels, as the initiative supports both health and education outcomes. Access to sanitary towels can improve school attendance and participation among adolescent girls. Ensuring compliance with the National Health Policy by incorporating health education on menstrual hygiene management into the program.

1.2.10. National Health Strategic Plan of 2022-2026

Zambia's National Health Strategic Plan (NHSP) for 2022 to 2026 outlines the country's health sector goals and strategies. This plan is aligned with Zambia's Vision 2030 and the Eighth National Development Plan (8NDP). It aims to achieve targets under Sustainable Development Goal No. 3 (SDG 3) for "Good health and well-being for all" and to ensure quality Universal Health Coverage (UHC) by 2030. The NHSP focuses on two main strategic directions: Strengthening Health Service Delivery to attain quality UHC; and Strengthening Integrated Health Support Systems to facilitate the attainment of SDG 3 targets.

Relevance: GEWEL 2 has health and nutrition strengthening activities.

Compliance: the ESMP has included health awareness programs as well as menstrual hygiene management, provide safe sanitation facilities, support gender-sensitive approaches.

1.2.11. Zambia Infection Prevention Guidelines of 2010

Infection prevention and control (IPC) guidelines are crucial for maintaining health and safety in healthcare facilities. Here are some key points from the guidelines: Basic principles of infection prevention. Conditions that allow infections to be transmitted to others. How to stop the spread of infectious diseases. Importance of IPC due to increased outbreaks and emergence of infectious agents. Factors contributing to increased infections include rapid population growth, poverty, environmental degradation, and inadequate public health infrastructure. The priority Focus of WASH-related IPC covers access to safe and adequate water. Handwashing practices. Appropriate sanitation. Solid waste management. Cleaning and sterilization. Minimum standards and guidelines for water, sanitation, and hygiene in health facilities for IPC2.

There's an Infection Prevention Manual specifically written for community and healthcare settings in Zambia. It provides valuable information for those involved in patient care and the infection prevention.

[5] UNESCO Education Policy Review: Zambia *https://unesdoc.unesco.org/ark:/48223/pf0000246408*

Relevance: GEWEL 2 has health and nutrition strengthening activities. It may produce waste and will have a workforce where diseases may be transmitted.

Compliance: the ESMP has included health awareness programs as well as WASH management, maintain public health and menstrual hygiene management, provide safe sanitation facilities.

1.3. National Legal Framework

The proposed project activities converge with several regulatory instruments which need compliance with. Presented in Table 3-1 below is a listing of key legislation relevant to the project and requiring legal compliance were applicable.

Table 3-1: Legislative framework

Legislation	Interpretation of Legislation	Relevance and compliance approach on the project
Environmental Management (Amendment) Act No. 8 of 2023 as read together with Environmental Management Act No.12 of 2011, the principal act	The Act provides for integrated environmental management, protection and conservation of the environment and sustainable management and use of natural resources. It promotes prevention and control of pollution and environmental degradation; and public participation in environmental decision making.	The project will involve activities that may impact on the environment and social resources. An ESMP is prepared and will be operated to manage risk. The following are included in the ESMP: • SCT: the program doesn't cause environmental harm, e.g., through littering or improper disposal of materials. • KGS: proper disposal or recycling of used sanitary products. • SWL: sustainable farming practices to minimize environmental degradation. • WASH Rehabilitation: pollution controls during construction and operation phases to protect water and soil resources. • Manage e-waste and pesticides in a proper manner.
The Environmental Management (Licensing) Regulations, SI No 112 of 2013	Provides for licensing for Air and Water Pollution, Waste Management, Hazardous Waste, Pesticide and Toxic Substances and Ozone Depleting Substances	The project may produce hazardous waste such as electronic waste and empty pesticides bottles during implementation. The provisions of these regulations will be complied with. Hazardous waste management and the integrated pest management have been prepared and will be implemented in line with the regulations
Solid Waste Regulation and Management Act No 20 of 2018	An Act to provide for the sustainable regulation and management of solid waste; general and self-service solid waste services; the licensing and functions of solid waste	The project activities will generate solid waste. A solid waste management plan will be prepared and implemented. The following are included in the ESMP: • SCT: any program-generated waste is disposed of safely. • KGS: proper disposal or recycling of used towels and packaging.

Legislation	Interpretation of Legislation	Relevance and compliance approach on the project
	service providers, operators and self-service solid waste providers and provide for their functions; the regulation, operation, maintenance and construction of landfills and other disposal facilities	• SWL: proper disposal of agricultural waste such as chemical containers. • WASH Rehabilitation: safe waste disposal practices during rehabilitation and ensure that the rehabilitated facilities comply with waste management regulations.
The Public Health Act No. 22 of 1995	This Act, has the objective of preventing and suppressing diseases and generally regulates all matters connected with public health in Zambia.	The project involves engagement of a workforce which requires maintaining public health in relation to this Act and its regulations. The following are included in the ESMP: • SCT: Health services for beneficiaries comply with sanitation standards. • KGS: hygiene and health awareness on menstruation. • SWL: Safe handling of agrochemicals and adherence to health protocols. • WASH Rehabilitation: health and sanitation measures are in place during infrastructure improvements and use.
Water and Sanitation Act of 2011	An Act to establish the National Water Supply and Sanitation Council and define its functions; to provide for the establishment, by local authorities, of water supply and sanitation utilities.	The project involves the rehabilitation of water and sanitation facilities. Provisions regarding the supply of such facilities will be complied with. WASH rehabilitation will ensure the standards on such facilities are complied with.
The Water Resources Management Act, 2011 (No. 21 of 2011)	This is a principal Act that provides for the management, development, conservation, protection and preservation of water resources and their ecosystems.	Project activities may occur around water resources. These will be protected, including their ecosystems. The following are included in the ESMP: • SCT: no adverse impact on water resources during program implementation. • KGS: proper sanitation facilities with efficient water use. • SWL: water and soil conservation in farming activities. • WASH Rehabilitation: sustainable water management in rehabilitated facilities and prevent water pollution.
Education Act (2011)	The Act firmly asserts a person's right to early childhood care, development, and	Education activities on the project will be undertaken in compliance with this Act. Providing equitable access to education, with a focus on providing support for vulnerable

Legislation	Interpretation of Legislation	Relevance and compliance approach on the project
	education, as well as basic education, including adult literacy education and high school education.	populations, including girls, to increase enrolment and retention in schools. The following are included in the ESMP: • SCT: funds help eliminate barriers to school enrolment for children. • KGS: efforts to retain girls in school by addressing menstrual health. • SWL: Educate women farmers on sustainable farming practices. • WASH Rehabilitation: improved access to education by enhancing water and sanitation facilities in schools.
Gender Equity and Equality Act (2015)	The Act strengthens the legal framework for the elimination of all forms of discrimination against women and girls. It prohibits harassment, victimization and harmful social, cultural, and religious practices.	The project involves women and girls as main beneficiaries. Engagement and implementation activities will avoid discrimination, violence and harassment. The following are included in the ESMP: • Social Cash Transfer: equal access to cash transfers, and prioritize women-headed households. • SCT: gender-sensitive education on menstrual hygiene. • - SWL: equitable access to resources, training, and land for women in farming projects. • WASH Rehabilitation: equal employment opportunities for men and women during rehabilitation projects.
Anti-Gender Based Violence Act 1 of 2011	The Act is meant to provide for the protection of victims of gender-based violence; constitute the Anti-Gender Based Violence Committee; establish the Anti-Gender-Based Violence Fund.	This project will protect the beneficiaries from all forms of GBV/SEA/SH. To protect women and girls against such vices, the project has a GBV/PSEAH plan has been Annexed to this ESMP.
The Children's Code Act No 12, 2022	It reforms and consolidate the law relating to children; provide for parental responsibility, custody, maintenance, guardianship, foster care, adoption, care and protection of children; provide for the making of social welfare reports in respect of a child in conflict with the law; provide for the protection	The project involves children as the girl beneficiaries. The project ESMP has provided protection of the children and their social welfare, protection of children from economic exploitation, ensuring they are not forced into labour as a result of household financial pressures, enhance children's access to education and healthcare, and each all-eligible children, ensuring equal access for girls. The LMP has been prepared.

Legislation	Interpretation of Legislation	Relevance and compliance approach on the project
	of a child victim and child witness.	
Occupational Health and Safety Act, 2010	This Act provides for the protection against risks to health or safety arising from, or in connection with, the activities of persons at work. Therefore, it is important that the activities of the project must protect the workers. Part IV, Section 16 (1 and 2) outlines the duties of the employer which are generally: providing a safe working environment.	The project will involve the use of labour. • Social Cash Transfer: The program must ensure that staff handling and distributing cash or engaging with beneficiaries operate in safe working conditions, minimizing risks such as theft, injury, or stress. • Compliance: ESMP provides a security management plan prepared to secure cash handling environments, including safe travel for staff. Training for staff on security and personal safety measures. Psychosocial support to reduce work-related stress. Adhere to OHS protocols in administrative offices and fieldwork. • KGS: ESMP provides safe working conditions, and schools should follow hygiene and safety protocols during operation. Training schools on hygiene and safety, ensuring safe storage of sanitary materials. • SWL: ESMP provides for-women farmers and those engaged in agricultural activities should work in safe environments, minimizing exposure to chemicals, heavy equipment, and physically strenuous labour. Providing training on safe use of agrochemicals and farming equipment. • WASH Rehabilitation Programs: ESMP provides for-workers involved in the rehabilitation of water and sanitation infrastructure must have appropriate safety measures to prevent accidents, exposure to hazardous materials, and health risks. Safety protocols on-site, including the use of Personal Protective Equipment (PPE). Conducting risk assessments before starting rehabilitation works.
Employment Code Act No 3, 2019	This legislation regulates the employment of persons; prohibits discrimination at an undertaking; provides for the engagement of persons on contracts of employment; provides for employment entitlements; provides for the protection of wages of	The project will involve a workforce. The project will comply with the national labour requirements. • Social Cash Transfer: Compliance with labour laws for staff involved in the program. • KGS: Ensure safe working conditions for those involved in distribution. • SWL: Ensure fair labour practices for women working in farming projects. • WASH Rehabilitation: Adhere to safe working conditions for workers involved in construction and rehabilitation.

Legislation	Interpretation of Legislation	Relevance and compliance approach on the project
	employees; regulates the employment of children.	
The Food and Nutrition Act No. 3, 2020	It aims to implement a national food and nutrition program, redefine the functions of the National Food and Nutrition Commission (NFNC), and establish related bodies.	Nutrition activities under the project will comply with the provision of the Act to promote nutrition. It supports vulnerable populations by providing financial assistance, which can improve access to food and enhance nutrition security for households. The GEWEL 2 shall ensure that beneficiaries, particularly those in vulnerable groups use the cash transfers to access nutritious food. Monitor the impact of SCT on food security and dietary improvements, especially among children and women. Collaborate with local food and nutrition bodies to provide guidance and education to beneficiaries on how to use the funds to ensure proper nutrition. Promote nutrition-sensitive agriculture by encouraging women farmers to grow diverse, nutritious crops.

1.4. World Bank Environmental and Social Standards

The applicable and triggered World Bank ESSs are presented in Table 3-2:

Table 3-2 Applicable Environmental and Social Standards (ESS) to the Project

Environmental and Social Standard	Applicability
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	The ESS1 is regarded relevant for the project. Assessment and management of risks and impacts will be conducted. The GEWEL project will not involve; (i) construction but minor rehabilitation activities; (ii) the project will be implemented within domestic and school settings and not in sensitive or near sensitive areas; (iii) hazardous waste is not expected to be generated except for biowaste and solid waste; (iv) the project will not involve risks and impacts to tangible or intangible cultural heritage. The environmental risks may include; (i) the generation of biohazard waste from the use of menstrual hygiene kits, waste debris from rehabilitation works and wastewater pollution from domestic and school sanitation; (ii) the generation of e-waste from improved service delivery; (iii) OHS risks to PPMs during SCT activities and; (iv) downstream environmental risks from TA activities. All negative environmental risks and impacts are expected to be temporary, site-specific, reversible, and mitigated through the implementation of a project ESMP. This ESMP includes guidelines for menstrual waste management and guidelines for the standard of wastewater management, e-waste management plan and an OHS risks assessment and plan for PPMs. Social risks associated with this operation may include: (i) increased incidence of GBV/SEA/SH risk (ii) exclusion for eligible vulnerable households, including persons living with disability, (iii) elite capture, (iv) labour risks and (v) lack of meaningful consultations. Corresponding mitigation measures are documented in appropriate instruments which include, LMP, SEP, GRM as well

Environmental and Social Standard	Applicability
	as the updated GBV/SEA/SH Action plan. To further manage these risks and impacts dedicated E&S GRM and GBV/SEA have been assigned. For activities involving WASH facilities, site screening will be conducted using form in Annex 8followed by preparation of site specific ESMPs using the template in Annex 9.
ESS2: Labor and Working Conditions	ESS2 is considered relevant for this operation. A Labour Management Procedure (LMP) that includes preventive measures for GBV/SEA/SH, managing OHS risks, prevention of child labour, forced labour and PPM security management plan has been prepared. The LMP contains requirements for OHS risk assessment and the process for conducting OHS risk assessments and developing safe systems of work that will be described in the ESMP. Measures contained in the LMP are applicable to the following worker categories: (i) direct workers (PIU staff/specialists, pay masters, trainers) at national and provincial level and (ii) temporary workers contracted to provide services such as consultants and (iii) community workers (Community Welfare Assistant Committees (CWACs) and Community Health Volunteers (CHV's). Selection of CWAC and CHV members is conducted through a transparent and inclusive election process at community level. Workers engaged will include: (i) PIU staff/specialists, at national and provincial level, (ii) community workers including civil servants and volunteers and Labor risks may arise due to failure to abide by national legislation on employment in relation to working hours, wages, overtime, as well as compensation and benefits. Civil servants, whether full-time or part-time, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement. Individuals under the age of 18 will be prohibited from working on the Project by national laws and regulations.
ESS3: Resource Efficiency and Pollution Prevention Management	The project may generate biohazards waste from the use of menstrual hygiene kits, rehabilitation waste debris from minor rehabilitation works of WASH facilities and wastewater pollution from domestic and school sanitation. Where waste from the use of menstrual hygiene kits cannot be avoided, then waste generation is minimized. If waste cannot be minimized, then waste disposal and/or treatment to be undertaken according to ESF requirements and in line with GIIP by the borrower. The minimization of waste menstrual material could be achieved using reusable and washable cloth pads or the use of biodegradable products. Waste from rehabilitation works will be managed in line with EHSGs. Project sites should ensure control of wastewater through site screening and appropriate wastewater management interventions. Other risks include the generation of e-waste from improvement of service delivery which will require management throughout project implementation using an e-waste management plan. The WASH rehabilitation activities will involve (a) Water Supply Improvement; (i) Repairing and equipping already drilled boreholes and water reticulation network (pumps, storage tanks with stands; (ii) installation of online chlorinators, equipping with sustainable energy sources e.g., solar); (iii) Promotion and introduction of water harvesting facilities at Health Facilities and (iv) Undertaking of trainings for capacity building on operation and maintenance of water sources (b) Sanitation; (i) Rehabilitation of defective sanitary facilities (septic tanks and upgrade pit latrines to water borne toilets) at health facilities; (ii) Provision

Environmental and Social Standard	Applicability
	of hand wash facilities at essential Community and health facility service delivery points; (iv) Printing and dissemination of waste management guidelines; (c) Water quality monitoring at community level; (i) Procurement of water quality monitoring portable laboratories (dual) chemical and biological analysis to be based at selected health facilities; (ii) Procurement of domestic chlorine and high testing hypochlorite chlorine and development of awareness and treatment protocol) (iii) Hold trainings for community based volunteers on WASH infection, prevention and Control (IPC) guidelines for HF and food safety (Wash protocols); (iv) Provision of health facility and community based oral rehydration points at all essential service points (mobile safe drinking water points), and (v) Printing and dissemination of WASH monitoring tools. To mitigate the risks and impacts of waste generation, a Waste Management Plan has been prepared with mitigation measures in line with ESSs, the EHSGS and GIIPs in Annex 6
ESS4: Community Health and Safety	ESS4 is considered relevant. There is likely to be a risk of exposure by the community to waste, dust and noise during minor rehabilitation works. To manage such risks, all rehabilitation facilities will be screened for risk identification and implementation of the ESMP will be ensured. There is a potential risk of GBV/SEA/SH on community safety. To manage this risk, the implementation of the LMP, SEP and the GRM will be promoted to ensure awareness raising among community members. A code of conduct will be adopted for all workers engaged by the project and will include provisions to address GBV/SEA, outlining the process of addressing such complaints with guidance from the World Bank Good Practice Note (GPN) on GBV. Proper training on the risk management procedures including OHS measures will be provided by the project's environmental and social focal points. The project will also identify focal persons to oversee prevention and management of GBV/SEA/SH risks at project and community level. The project will also adopt a code of conduct for all workers engaged by the project and will include provisions to address GBV/SEA and will outline the process of addressing such complaints in line with guidance from the World Bank Good Practice Note (GPN) on GBV.
ESS10: Stakeholder Engagement and Information Disclosure	A Stakeholder Engagement Plan (SEP) consistent with ESS10 that identifies the relevant project stakeholders that might be affected or interested in the activities of this operation has been prepared. The SEP provides an overview of consultations undertaken before appraisal. Initial consultations took place with the office of the Vice-president, members of Parliament, Provinces, districts, various line ministries, Parents Teachers Association, Community Welfare Assistants, Girls and boys, between June and December 2023.

2. DESCRIPTION OF THE PROJECT

2.1. Project Activities

The project will comprise four components as follows:

2.1.1. Component 1: Foundational Social Cash Transfer and Nutrition (US$80 million equivalent - US$73 million IDA and US$7 million GFF)

This component will ensure the continuity of the foundational SCT program for a cash 'plus' approach, with complementary activities for improved nutrition outcomes. It will invest in the SCT as the national social assistance program to continue strengthening household food security and resilience to climate and other shocks, with complementary activities layered on under a cash 'plus' approach for improved nutrition among poor households in the *first 1,000 days of a child's life*, building on ongoing efforts.[6] Implementation will follow an integrated approach focusing on both nutrition-sensitive and nutrition-specific activities for improved purchasing power, as well as demand creation and service provision.

Subcomponent 1.1: Nutrition-Sensitive Foundational Social Cash Transfer (US$70 million IDA grant equivalent)

This subcomponent will ensure predictable and reliable cash transfers to the SCT, including scaling up in response to climate and other shocks, with gradual phase-out for full government financing within the project period. IDA-support has been critical in stabilizing the predictability and reliability of SCT delivery to poor and vulnerable households. Assuming continued strong Government commitment to the SCT, GEWEL 2 aims to scale up the SCT to 1.5 million households.

Subcomponent 1.2: Nutrition-Specific Activities for Demand Creation and Service Provision (US$10 million - US$3 million IDA grant and US$7 million GFF grant)

Further, PHC facilities will be supported with anthropometric equipment, supplies, and commodities that may be required, such as height measuring boards, weight measuring scales, and ready- to-use therapeutic food, among others. Support will also be given to improving sanitation at PHC facilities and surrounding areas with the provision of WASH services, minor renovation/rehabilitation of WASH facilities, and access to clean water.

2.1.2. Component 2: Keeping Girls in School and Beyond (US$35 million equivalent)

Focusing on adolescent years, this component will support human capital and economic aspirations of young girls by supporting their educational attainment and transition from secondary school to tertiary education or work. GEWEL 2 will scale up KGS nationally through financial assistance to eligible adolescent girls for associated education costs to enable their enrolment in upper primary and secondary schools. The KGS component targets poor and vulnerable girls from SCT households in a cash 'plus' approach and provides them with an annual education grant,[7] as well as covers their boarding facility, examination fees, and other costs, as necessary. Under GEWEL 2, KGS will be gradually expanded to meet the increased demand for education generated by EFA, with the ambition of supporting 262,444 girls over the project duration, 63,000 of whom will have transitioned from the first phase of GEWEL, while 199,444 will be new enrolments in upper primary (grades 4–6) and secondary school (grades 7–12) levels.[8] To address high dropout rates among adolescent girls

[6] Ongoing work includes, but is not limited to, the 1,000 Days Nutrition Pilot implemented by the Ministry of Community Development and Social Services (MCDSS), supported by UNICEF and bilateral donors; the First 1000 Most Critical Days Program Phase 2; Scaling Up Nutrition Phase 2; Food and Nutrition Security; Enhanced Resilience program; and Scaling Sustainable Nutrition for All, among others.

[7] The education grant amount will be increased from ZMW 600 to ZMW 800 under GEWEL 2 in response to the impact of inflation on the grant adequacy, with an option for increasing the amount during project implementation based on an assessment of prevailing economic conditions.

[8] Recognizing that increased enrollment will put pressure on the education infrastructure, KGS expansion will continue to be closely

in Zambia, this component will continue to scale up[9] the KGS CMS across all KGS schools nationally. It will also continue to strengthen and scale up ongoing efforts to address key drivers of school dropout and early marriages, such as regressive gender norms and SRGBV. Specifically, continued investments will be made to gradually scale up the SRGBV Clubs across all KGS schools to strengthen awareness of SRGBV issues, including using these clubs as platforms for trainings on sexual reproductive, GBV, and adolescent nutrition and health issues,[10] as well as strengthen school-based structures (i.e., school administration and parent-teacher committees) to better address SRGBV issues.

2.1.3. Component 3: Supporting Women's Livelihoods for Climate-Smart Productive Inclusion (US$35 million equivalent)

With the goal toward improving economic independence in *adulthood*, this component will aim to transform household-based subsistence activities to more productive and profitable enterprises. Priority will be given to strengthening women's economic empowerment, key to breaking the intergenerational transmission of poverty. As a first step, SWL will be gradually scaled up nationally to all 116 districts, expanding also to urban areas in response to rising urban poverty in Zambia. Beneficiaries will receive: (a) a productivity grant of US$225 equivalent to serve as seed capital, with options for additional financing from the CDF and other microfinance entities to be explored; (b) training and mentorship on life and business skills (LBS), with an explicit focus on digital literacy and climate resilience and adaptation for diversification of livelihoods away from climate-harmful activities; (c) additional training on climate-smart agriculture practices[11] to support sustainable pathways out of poverty for vulnerable women, in collaboration with the Ministry of Agriculture (MoA); and (d) support on savings groups formation, with digitization of savings groups scaled up to promote financial inclusion and options for using these groups as a platform for providing nutrition training explored.[12] The ambition of this component is to reach 200,000 beneficiaries, which is estimated to require US$76 million.

2.1.4. Component 4: Institutional Strengthening and Systems Building for Cash 'Plus' Delivery (US$7 million equivalent)

To ensure continued effective and accountable delivery of SP services and achievement of project results, investments will be provided to strengthen adaptive SP systems and institutional capacities. To enhance girls' and women's empowerment, attention will be given to deepening citizen engagement and addressing negative social norms that give rise to unequal gender practices and GBV. To strengthen adaptive SP delivery systems, focus will be on operationalizing digital solutions to support effective and accountable delivery of services and promote greater coordination and collaboration in SP programming.

3. DESCRIPTION OF THE BASELINE ENVIRONMENT

The baseline information includes a description of the current situation in terms of the socioeconomic environment and physical environment. Zambia is divided into ten provinces namely, Central, Copperbelt, Western, North-Western, Eastern, Northern, Muchinga, Luapula, Lusaka and Southern. The proposed GEWEL

coordinated with the ongoing World Bank-funded Zambia Education Enhancement Project (P170513), which is constructing additional schools and classrooms, among other activities. It will also be complemented by government financing of construction and/or renovation of boarding facilities, noting that no IDA financing will be utilized for educational facility construction and/or renovations and rehabilitation.

[9]Under GEWEL 2, the CMS will be scaled up to 20 new districts in 2025 and 18 new districts in 2026 to reach national coverage, while 2027–2029 will focus on consolidation and sustainability of efforts.

[10]Possible linkages with the School Health and Nutrition program, implemented by MoE in close collaboration with MoH, will also be explored.

[11] Of the beneficiaries, 70 percent will continue to be from rural areas, with the remaining 30 percent targeted in urban areas. For implementation in urban areas, interventions will be adapted to unique urban contexts based on market and needs assessments undertaken prior to implementation.

[12] Of the total component financing available, about 40 percent is expected to be allocated to productivity grants, about 40 percent to mentorship, LBS and other trainings, including on climate-smart agriculture, and about 20 percent to formation of savings groups.

2 project will be implemented in a total of 116 districts across all the ten provinces, while the nutrition interventions under MoH will be undertaken in two selected districts.

3.1. Location and Size

Zambia is a landlocked country that lies at the end of the Great Rift Valley between latitudes 8° and 18° S and longitudes 22° and 33° E. It shares the political borders with eight neighbours, namely Angola, Democratic Republic of Congo, Tanzania, Malawi, Mozambique, Botswana, Namibia, and Zimbabwe. The political boundaries have several shared biodiversity resources because of the common habitats. The country covers an area of 752,618 km2 (Dowsett et al., 2008). Zambia has 10 provinces and a total of 116 districts. (Figure 5-1)

Figure 3-1: Map of Zambia showing provinces and districts

3.2. Physical Environment

3.2.1. Climate

Although Zambia lies within the tropics, its climate is modified by the altitude of the country and is generally favourable to human settlement. In January, the rainy season is at its peak; by June the weather is dry. Precipitation (concentrated in just five months) varies according to agroecological region but generally comes in storms with heavy raindrops that lead to a hard soil surface and surface erosion. The driest region receives annual precipitation of less than 30 inches (800 mm), while precipitation in the wettest region normally exceeds 40 inches (1,000 mm); precipitation occasionally exceeds 55 inches (1,400 mm) in the northeast. Temperature is modified by elevation, with the highest mean daily maximum temperatures occurring in the

Luangwa valley and the southwest. The coolest area overall is the high Nyika plateau, in the northeast on the border with Malawi. During the cold months (June and July), the area west of the Line of Rail is coolest, with mean minimum temperatures mostly below the about 7°C. Zambia is frequently inundated with seasonal floods and flash floods, extreme temperatures and droughts, with increased severity and frequency in recent decades. Inadequate infrastructure paired with the fact that a large proportion of the population is rural and poor, makes Zambia highly vulnerable to natural hazards, especially floods.

3.2.2. Vegetation

The natural vegetation is savanna woodland dominated by miombo. Mopane and munga woodlands cover much of the hot and dry southern valleys of the Zambezi and Luangwa. Forests cover about 49.9 million ha (66% of land cover). The forest vegetation type is mainly Miombo (Semi evergreen forests); Baikiaea, Munga, Mopane, Kalahari woodlands (Deciduous Forests), Riparian, Swamp, Parinari, Itigi, Lake basin Chipya (Evergreen forests), Termitary associated bushes (Shrub thickets), grasslands, wooded grasslands, as shown in the Figure 5-2.

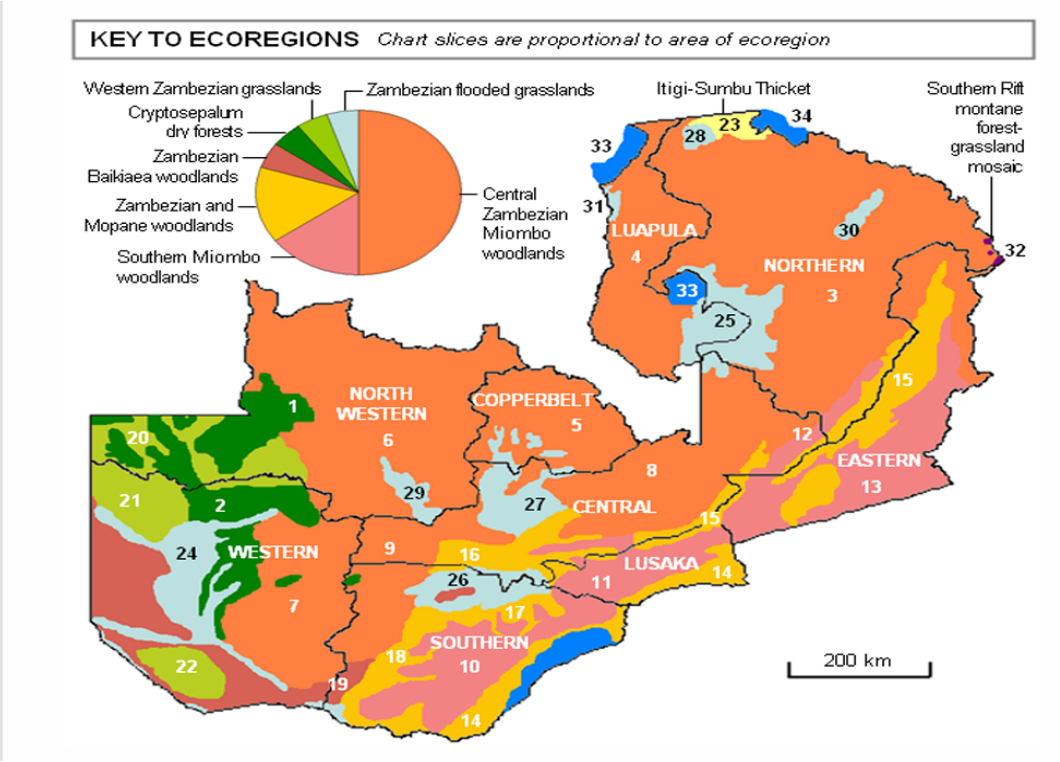


Figure 3-2: Ecoregions of Zambia, UNREDD, ILUA[13]

Main Agro-Ecological Regions in Zambia. Region, I cover the plateau sub-region in Southwest Zambia and the valley region in South Luangwa and Zambezi valleys. The region receives less than 800 mm annual rainfall and covers about 15 million hectares equivalent to 20 percent of the country. Region II consists of the sandveld plateau of Central, Eastern and Southern provinces and the Kalahari Sand plateau of Western Province. The region receives 800-1000 mm annual rainfall and covers approximately 27 million hectares equivalent to 36 percent of the country. Region III receives over 1000 mm annual rainfall and covers about 33 million ha equivalent to 44 percent of the country. This region mostly covers the Copperbelt, Luapula, Northern and North-western Provinces.[14]

[13] *02_05_05_Zambia_NFMS_Kasaro.pdf (un-redd.org)*

[14] *Chapter 1 - Background | Zambia Biodiversity (chm-cbd.net)*

3.2.3. Surface and Groundwater Resources

Zambia has extensive surface water resources, with a number of large perennial rivers. The major dammed surface water reservoirs are used primarily for electricity, but also provide water supplies. Much of the population relies on groundwater for domestic water supplies, both directly and via urban municipal water supply schemes, and groundwater is also used for irrigation.

3.3. Social, Economic and Cultural Environment

Zambia ranks among the countries with the highest levels of poverty and inequality globally. Poverty reached 60% of the population in 2022, up from 54.4% in 2015, worsened by limited job creation and declining labour earnings. The urban population recorded the highest reversal, with an 8.5 percentage point increase in poverty incidence reaching 31.9% in 2022. The spike is undoubtedly linked to the COVID-19 pandemic and the ensuing debt crisis. However, the growth deceleration that preceded the crises was already manifesting in weakening labour market indicators such as formal employment and earnings. Meanwhile, rural poverty remained widespread and stagnant, surpassing 75% since 2010. Rural/urban disparities in access to essential services remain stark, hindering human capital development and labour productivity (World Bank, 2023). According to the 2015 Zambia Living Conditions Monitoring Survey Report, 58.5 percent (5, 925,412) of the population are in the labour force, while 41.5 percent (4, 203,497) are economically inactive. Of those that are in the labour force, 43 percent, 6.3 percent and 9.2 percent are in paid employment, unpaid family workers and not working, respectively. Zambia has a vast collection of cultures, language dialects and customs. It is home to more than 70 ethnic groups, including the Bemba in the Northern, Luapula and Copperbelt provinces, Tonga in the Southern province, and Lozi in the Western province, the Ngoni in Eastern province, the Lunda, the Luvale and the Kaonde in North-western province. Thirteen languages are spoken in Zambia and its contemporary culture is a blend of values, norms, material, and spiritual traditions of the diverse ethnic groups.

3.3.1. Demographics

Zambia is experiencing a large demographic shift and is one of the world's youngest countries by median age. Its population, much of it urban, is estimated at about 20,5million (2022), with a rapid growth rate of 2.7% per year, reflecting the relatively high fertility rate. As the large youth population attains reproductive age, the population is anticipated to double in the next 25 years, resulting in additional pressure on the demand for jobs, health care, and other social services (World Bank, 2024). The average household size in Zambia is 5.1 persons. Overall, the average household size tends to be larger in rural areas with an average of 5.2 persons compared to 5.0 persons in urban areas. Male headed households tend to have a larger average household size than female headed households. The average household size for male headed households was 5.4 persons compared to 4.3 persons for female headed households.

3.3.2. Education and Health

Zambia has achieved near universal primary school completion levels - national statistics indicate a completion rate of 91.8 per cent at Grade 7. But this masks considerable regional disparities, with the northern region recording 81.3 per cent (72 per cent for female students) and Lusaka a rate of 78.6 per cent. For children in the early years, the coverage of care, learning and education services remains persistently low. Overall, girls continue to be at a disadvantage with many dropping out in the upper primary and secondary grades, and poorer levels of transition to junior secondary and senior secondary levels. Transition rates from primary to secondary school continue to remain low at 67.5 per cent, mainly due to the lack of places to accommodate all primary school graduates. For girls at secondary level, there are also barriers around the lack of menstrual hygiene facilities, the low value placed by some communities on girls' receiving a secondary education, teenage pregnancy, and child marriage.

The Zambian health care system comprises more than 3,000 registered public and private health facilities in 116 districts across the 10 provinces of the country. These facilities include hospitals, general clinics, dental clinics, eye clinics, physiotherapy offices, health centres, health posts, and any other facilities. Specific policy

options and recommendations have been made for Zambia to improve infrastructure, exclusive breastfeeding and childhood nutrition; increasing equity in antenatal care coverage and births attended by skilled health personnel; prevention of communicable and non-communicable diseases including increasing the availability of health personnel. MoH has identified key action areas: development of evidence based pro-poor policies, use of health in all policies approach, prevention of communicable and non- communicable diseases, strengthening the health system, education including early childhood development, gender empowerment, reproductive, maternal and child health, improving access to safely managed sources of drinking water and improved sanitation facilities, poverty alleviation and social protection, promoting healthy lifestyles, road safety and improving living conditions in informal urban settlements.

3.3.3. Economic Activities

Zambia's economy has experienced mixed development in the years since its independence in 1964. Nonetheless, economic performance has been impressive over the past decade, with an average annual real GDP growth rate surpassing 7 per cent during this period. This has largely been driven by growth in construction, transport, communications, the public sector, trading, and mining. Mining remains a driver of investment to other sectors, especially construction, transport, and energy. Copper is the country's mainstay, contributing about 70 per cent to export earnings, but employs less than 2 per cent of the population. However, over the last few years, non-traditional exports have grown substantially. Most people in Zambia (60 per cent) live in rural areas, where they depend on subsistence agriculture for their livelihoods. Poverty is most prevalent in rural areas (76.7 %) compared to 23.4% in urban areas[15]. In both rural and urban households, poverty levels are highest among female-headed households, with extreme poverty levels of over 60 % in rural areas[16].

3.3.4. Waste management

The country is faced with a critical waste management problem. Major concerns include: littering, uncollected garbage, and indiscriminate dumping of waste; improper handling of hazardous wastes; health hazards due to indiscriminate disposal of waste; low standards of operational disposal sites; and potential for contamination of soils and underground/surface water from operations of disposal sites and the indiscriminate disposal of wastes. Improvements are desired in waste management covering aspects of minimisation of waste generation, collection, reuse, recycling, treatment and disposal. Domestic waste is buried, burnt or collected by the local council and disposed of at a local non-engineered disposal site. In Zambia much of the medical and biohazard waste is incinerated using burning chambers (traditional incinerators) at health facilities.

[15] Zambia Central Statistical Office. 2015. 2015 Living Conditions Monitoring Survey (LCMS.
[16] Living Conditions Monitoring Survey 2006-2011

4. ENVIRONMENTAL SOCIAL RISKS IMPACTS AND MITIGATION MEASURES

4.1. Positive environmental and social impacts of the Project

The project will be implemented across all 10 provinces in schools and in domestic settings and not in sensitive or near sensitive areas or areas of threatened species/migratory species, their habitats or negative impacts to valuable ecosystem components. The project will not involve risks and impacts to tangible or intangible cultural heritage. Overall, the project is aimed at improving the well-being of women and adolescent girls from the poorest households in Zambia. The proposed activities will result in a positive impact through the increase of women's and adolescent girls' empowerment. The project will adopt a life cycles approach to promote greater productivity and human capital growth for sustainable pathways out of poverty and will focus primarily on girls' and women's empowerment, in recognition of worsening gender inequality and their potential to drive development transformations.

4.2. Negative Environmental and Social Risks and Impacts

However, some activities may pose some E&S risks and impacts generally of moderate risks. The identified environmental and social risks and impacts include:

(i) Rehabilitation activities of WASH facilities may cause moderate level Occupational Health and Safety (OHS) risks, demolition waste, sanitation waste and labour risks,
(ii) It may involve the generation of e-waste through improvement of service delivery and solid waste from rehabilitation works;
(iii) There may be some low-level agricultural activities with very low risks, and pesticide use with moderate risks. The project may generate biohazards waste from the use of menstrual hygiene kits and wastewater pollution from domestic and school sanitation,
(iv) There may be an increase in the generation of solid waste from Component 1 and 3 activities and hazardous waste including waste sanitary towels and blood contaminated water from component 2 activities
(v) Security risks for social cash transfer activities which may include thefts, fatalities and violence for pay point managers and beneficiaries,
(vi) Adolescent girls are particularly at risk of SEA and GBV. It is assumed that the risks of SEA could also be attributed to the varied understanding of the issue among all stakeholders responsible for project implementation. Perpetrators of such violence against girls and women can be any individual associated with the project such as school guidance counsellors, firm contracted to provide independent monitoring and community members.

Lack of meaningful consultations and limited participation with some stakeholders (such as people living with disabilities, marginalized women, the young and elderly) resulting in the risk of elite capture and existing social and cultural norms which may limit participation of women during community consultations contrary to ESS 10. The following measures have been proposed to mitigate this risk:

(i) strengthen the GRM under GEWEL to ensure it is GBV sensitive and part of the grievance management system
(ii) awareness raising on risks of SEA and GBV;
(iii) develop and implement a Stakeholder Engagement Plan throughout the project cycle.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating is Substantial due to the nature of the proposed project activities, the risk is considered substantial. The project will empower vulnerable girls and women with the likelihood of a change in local power dynamics on the project area of influence.

The negative E&S risks and impacts of the project, together with the identified mitigation measures are presented in Table 6-1.

Table 4-1: Proposed mitigation measures

Aspect	Impact	Mitigation measure
Component 1: Social Cash Transfer and Nutrition Intervention		
Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	Altering power dynamics at household level has tendency to contribute to increased risks of Gender Based Violence (GBV) and illicit sexual relations with minors from local communities. Rural communities have limited access to health facilities and support services for GBV/SEA	• Implementation of the LMP (Annex 4), SEP and the GRM (Annex 2) • Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways • Dedicated ESS and GBV/SEA experts will be recruited/ assigned within the implementing agencies • Training staff, establishing clear policies
Exclusion of Vulnerable Groups	Gender exclusion and lack of meaningful consultations and participation with some stakeholders (such as people living with disabilities, marginalized women, the young and elderly)	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media platforms • Design targeted programs to ensure equitable distribution of cash transfers
Labor including forced/trafficked and or child labour	Poor labour and working conditions may impact adversely on the workers in the project. Failure by contractors to abide by national legislation & ESS2 requirements. GBV/SEAH.	• A Labour Management Procedure (LMP) has been developed to address the OHS and labour issues relating to direct and contracted workers and community volunteers (see Annex 4)
Security Risks	Cash transfers can increase the risk of theft or violence, especially if beneficiaries are carrying or storing significant amounts of cash. There is potential OHS risks associated with the Social Cash Transfer (SCTs) method of payment mainly Payment Point Mangers (PPMs)	• A Security Management Plan has been developed (see Annex 3) which articulates mitigations measures including: (i) examine vulnerabilities (ii) limiting the amount of cash carried by any one PPM (iii) PPM security protocols and emergency training iv) implement secure methods for cash distribution, such as digital transfers (ix) establish partnerships with local law enforcement, amongst others.
Occupational Health Safety and Security Risks (OHS)	General OHH accidents on the work sites The shift to productivity is more demanding and can impact women's physical and mental health due to increased workloads or stress, and this may cause incidents.	• Promote work-life balance and provide access to health services and mental health support. Encourage practices that prioritize women's well-being and safety. • Implement comprehensive occupational health and safety (OHS) training for the women. Establish safety protocols and use of PPE.

Aspect	Impact	Mitigation measure
		• Provide training on handling and storage of hazardous materials.
Increased Consumption and Generation of Solid Waste	Direct cash transfers, delivery of educational materials and transitioning to enterprises can lead to increased consumption, higher waste generation and environmental degradation.	• Provide training and encourage sustainable consumption practices among beneficiaries • Promote more sustainable practices in agriculture techniques. Encourage the use of renewable energy sources to prevent deforestation for charcoal.
Chemical, pesticide and fertilizer use	Increase the use of chemicals and pollutants, affecting local ecosystems. Pesticides can affect non-target species, including beneficial insects, wildlife, and plants. Poses health risks to people.	• Provide training on the use integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Use targeted selective pesticides and promote biodiversity. • Provide training to women on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures.
Land Use Changes	Expanding productive enterprises might lead to changes in land use, potentially causing deforestation, habitat loss, or soil degradation.	• Adopt conservation land management practices, agroforestry and reforestation initiatives to offset land use changes. • Encourage the beneficiaries to use existing fields.
Inequality and Social Tensions	Exacerbating existing social inequalities or create new tensions if not well-targeted, and they might lead to conflict between beneficiaries and non-beneficiaries. Beneficiaries might face stigma or social exclusion ty members. Cash transfers might be misused or misallocated. Affect family dynamics and intra-household relations, sometimes leading to conflict including GBV/SEAH. Lack of inclusivity, community support and understanding of the importance of girls' education can hinder the success of the program, including cultural beliefs and early marriages.	• Use data-driven and transparent criteria for selecting beneficiaries to ensure that the most vulnerable populations are prioritized. • Periodically review and adjust targeting criteria to address emerging needs and avoid creating new inequalities. • Involve community members in the planning and implementation phases to foster understanding. • Establish accessible and impartial grievance redress mechanisms for beneficiaries and non-beneficiaries to voice concerns and resolve disputes. • Facilitate community dialogue sessions to address conflicts and promote understanding between beneficiaries and non-beneficiaries. • Run awareness campaigns to educate the community about positive impacts on poverty reduction and community welfare. • Encourage social inclusion by showcasing success stories of beneficiaries. • Conduct regular audits and financial reviews. • Ensure that the program is inclusive and reaches the most disadvantaged girls. Provide additional support services, such as mentorship and counselling, to empower girls academically and socially. • Engage with parents, community leaders, and local organizations to raise awareness about the benefits of girls' education. Conduct community meetings and

Aspect	Impact	Mitigation measure
		information sessions to foster a supportive environment.
Cultural Risks	Cash transfers might not align with local cultural practices or traditions, leading to social friction. If the program does not consider local customs related to financial management might be less effective or even disruptive.	• Incorporate cultural sensitivities into account when designing and implementing cash transfer program to ensure they are well-received and effective. Involve local leaders in the planning and implementation stages to gain support and ensure cultural alignment. • Consider traditional meeting places or trusted community centres. Implement the GRM.
Rehabilitation of WASH Infrastructure		
Construction risks	Screening form to be completed to identify risks (Annex 8)	• Complete the E&S screening form and update the ESMP, if necessary
Waste generation	The process of rehabilitating WASH facilities can generate construction waste, which may include debris, concrete waste, packaging materials, and old fittings, and even generation of hazardous waste from decommissioned sanitation facilities. Asbestos will not be decommissioned at any point on the project.	• Implement effective waste prevention, reduction, recycling, and disposal practices during construction and operation. • Implement segregation of waste and proper disposal of each waste type. • Dispose of inert waste at the local designated disposal site in conjunction with the local council. • Identify and safely handle hazardous waste from decommissioned sanitation facilities, using ZEMA certified hazardous waste disposal companies to ensure safe and compliant disposal.
Material sourcing	The rehabilitation and installation of WASH infrastructure requires raw materials and energy, which can have a significant environmental footprint.	• Source raw materials from sustainable suppliers. • The project will not open any new borrow pits.
Disruption of operations at the facility	Temporary disruptions in PHC Facility operations. Rehabilitation activities may also impact local ecosystems if not well managed.	• Plan and implement the rehabilitation in phases to minimize disruptions to PHC facility operations.
OHS risks	OHS risks, accidents are possible at the construction sites.	• Implement on-site OHS management measures to promote occupational and public health. • Use safety signage • Use appropriate PPE
Biodiversity and soil	Soil disturbances and erosion Vegetation disturbances	• Implement measures to control erosion and sediment runoff, such as silt fences, sediment traps, and vegetation cover, to protect nearby water bodies and soil quality. Limit vegetation clearing to rehabilitation sites only. Rehabilitate open areas at decommissioning.
Noise and Air quality	Noise and dust impacts may be produced at the work sites.	• Dust Suppression by regularly spray water construction areas and materials.

Aspect	Impact	Mitigation measure
		• Install physical barriers, such as dust screens, enclosures for specific areas, demolition sites or material storage. • Ensure noise levels do not exceed acceptable levels for a heath facility (75db). Install noise barriers around noisy equipment and sites. • Select and use equipment designed to operate at lower noise levels. Regularly service machinery to prevent excessive noise. • Schedule noisy activities during times when health facility operations are minimal or less sensitive. • Use clear signage to inform health staff and patients about construction activities and potential OHS risks.
Component 2: Keeping Girls in School and Beyond		
Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	Altering power dynamics may contribute to increased risks of Gender Based Violence (GBV) and illicit sexual relations with minors from local communities.	• Implementation of the SEP and the GRM (Annex 2) • Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways
Exclusion of Vulnerable Groups	Gender exclusion and lack of meaningful consultations and participation with some stakeholders. Constrained by lack of support from their household, especially over adolescent girls.	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media platforms • Design targeted programs to ensure equitable distribution of benefits
Solid waste generation	Higher enrolment can lead to increased waste generation.	• Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting.
Hazardous waste	Higher enrolment may lead to the use of more reusable sanitary towels. But some girls may still purchase more non reusable towels due to empowerment. Reusable sanitary towels require regular washing, which requires reliable water supply, inadequate cleaning of reusable sanitary towels can lead to health risks, there can be generation of biohazard waste and blood contaminated water.	• Educate the pupils on efficient washing practices to minimize water use. Ensure that users have access to sufficient clean water and sanitation facilities. • Include private, safe, and hygienic spaces for washing and drying sanitary towels. • Ensure comprehensive education on the proper hygiene, safe disposal practices and set up designated collection points for biohazard waste and used cleaning water. • Promote biohazard waste management system to handle blood contaminated water and materials • Collaborate with local authorities and MoH to ensure that wastewater treatment facilities can handle blood-contaminated water. Promote the use of bio-digesters or similar technologies for on-site treatment

Aspect	Impact	Mitigation measure
		in rural areas; a designated well-constructed soak pits where the blood water can be treated/ disinfected water before disposal.
Inequality and Social Tensions	Exacerbating existing social inequalities or create new tensions if not well-targeted, and they might lead to conflict between beneficiaries and non-beneficiaries. Lack of inclusivity, community support and understanding of the importance of girls' education can hinder the success of the program, including cultural beliefs and early marriages.	• Involve community members in the planning and implementation phases to foster understanding. • Establish accessible and impartial grievance redress mechanisms for beneficiaries and non-beneficiaries to voice concerns and resolve disputes. • Facilitate community dialogue sessions to address conflicts and promote understanding between beneficiaries and non-beneficiaries. • Run awareness campaigns to educate the community about positive impacts on poverty reduction and community welfare. • Encourage social inclusion by showcasing success stories of beneficiaries. • Engage with parents, community leaders, and local organizations to raise awareness about the benefits of girls' education. Conduct community meetings and information sessions to foster a supportive environment.
Component 3: Supporting Women's Livelihoods for Climate-Smart Productive Inclusion		
Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	Altering power dynamics at household level has tendency to contribute to increased risks of Gender Based Violence (GBV). Rural communities have limited access to health facilities and support services for GBV/SEA survivors Workers and community volunteers may also be at risk of GBV/SEA/SH.	• Implementation of the LMP (Annex 4), SEP and the GRM (Annex 2) • Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways • Dedicated ESS and GBV/SEA experts will be recruited/ assigned within the implementing agencies • Training staff, establishing clear policies
Exclusion of Vulnerable Groups	Gender exclusion and lack of meaningful consultations and participation with some stakeholders (such as people living with disabilities, marginalized women, the young and elderly) Constrained by lack of support from their household.	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media • Design targeted programs to ensure equitable distribution of cash transfers
Labor including forced/trafficked and or child labour	Poor labour and working conditions may impact adversely on the workers in the project. Failure by contractors to abide by national legislation & ESS2 requirements. GBV/SEAH. Inadequate implementation of OHS measures affecting direct,	• A Labour Management Procedure (LMP) has been developed to address the OHS and labour issues relating to direct and contracted workers and community volunteers (see Annex 4)

Aspect	Impact	Mitigation measure
	contracted & community workers.	
Occupational Health Safety and Security Risks (OHS)	General OHH accidents on the work sites The shift to productivity is more demanding and can impact women's physical and mental health due to increased workloads or stress, and this may cause incidents. The women and their workers may be exposed to hazardous materials, including chemicals, dust. Ergonomic risks such as musculoskeletal disorders.	• Promote work-life balance and provide access to health services and mental health support. Encourage practices that prioritize women's well-being and safety. • Implement comprehensive occupational health and safety (OHS) training. Establish safety protocols and use of PPE. • Provide training on handling and storage of hazardous materials. • Implement regular health checks
Increased Consumption	Direct cash transfers, delivery of educational materials and transitioning to enterprises can lead to increased consumption, higher waste generation and environmental degradation.	• Training -Encourage sustainable consumption practices among beneficiaries Promote more sustainable practices in agriculture techniques. Encourage the use of renewable energy sources to prevent deforestation for charcoal.
Waste generation	Increased enterprise production activities can lead to higher waste generation, and industrial by-products which are not safely disposed of. Institutions and systems under improved delivery of services, digitalization may generate e-waste.	• Conduct education campaigns to address myths and stigmas about menstruation. • Partner with manufacturers committed to sustainable practices, and quality products. • Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting. • Implement waste management practices. • Set up collection points for used chemical containers and work with waste management companies or the manufacturers of the chemicals. • Provide training on safe handling and disposal procedures. • Provide training on the responsible use and maintenance of digital devices to minimize damage and extend their usable life. • Establish e-waste collection points in communities to ensure that faulty electronic devices are properly recycled.
Chemical, pesticide and fertilizer use	Increase the use of chemicals and pollutants, affecting local ecosystems. Pesticide runoff can contaminate soil and water resources, affecting local ecosystems and biodiversity. Pesticides can affect non-target species, including beneficial	• Provide training on the use integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Implement buffer zones and proper waste disposal practices to prevent contamination. • Use targeted selective pesticides and promote biodiversity.

Aspect	Impact	Mitigation measure
	insects, wildlife, and plants. Poses health risks to people.	• Provide training on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures.
Resource Pressure and Impacts on Ecosystems	Increased purchasing power might put pressure on local natural resources, overuse of local water sources or deforestation for agricultural expansion into previously untouched areas, leading to habitat loss, due to increased demand.	• Promote and support local conservation initiatives to protect natural resources. For instance, establish programs that focus on, water use, sustainable water management and forest conservation. • Collaborate with local governments and organizations to enforce policies that regulate the use of natural resources.
Land Use Changes	Expanding productive enterprises might lead to changes in land use, potentially causing deforestation, habitat loss, or soil degradation.	• Trainings for women to adopt conservation land management practices, agroforestry and reforestation initiatives to offset land use changes. • Encourage the beneficiaries to use existing fields.
Inequality and Social Tensions	Exacerbating existing social inequalities or create new tensions if not well-targeted, and they might lead to conflict between beneficiaries and non-beneficiaries. Beneficiaries might face stigma or social exclusion from community members. Funds might be misused or misallocated. Affect family dynamics and intra-household relations, sometimes leading to conflict including GBV/SEAH.	• Use data-driven and transparent criteria for selecting beneficiaries to ensure that the most vulnerable populations are prioritized. • Periodically review and adjust targeting criteria to address emerging needs and avoid creating new inequalities. • Involve community members in the planning and implementation phases to foster understanding. • Establish accessible and impartial grievance redress mechanisms for beneficiaries and non-beneficiaries to voice concerns and resolve disputes. • Facilitate community dialogue sessions to address conflicts and promote understanding between beneficiaries and non-beneficiaries. • Encourage social inclusion by showcasing success stories of beneficiaries. • Conduct regular audits and financial reviews.
Cultural Risks	If the program does not consider local customs related to financial management it might be less effective or even disruptive.	• Incorporate cultural sensitivity in the during designing and implementing of cash transfer programs to ensure they are well-received and effective, and involve local leadership.

5. ENVIRONMENTAL AND SOCIAL MONITORING PLAN

Table 7-1 below outlines the Environmental and Social Monitoring Plan (ESMP). It follows the risks, impacts and mitigation measures identified in Section 6.2 above and provides the performance indicators, monitoring requirements, frequency as well as responsible entities for ESMP implementation and monitoring. The E&S risks are moderate. The requirements of the ESSs, Environmental Health and Safety Guidelines (EHSGs), national environmental and social legislation were considered in the preparation of the ESMP as described in Table 7-1.

Table 5-1Environmental and Social Implementation Plan

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
Component 1: Social Cash Transfer and Nutrition Intervention						
All project phases	Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	Altering power dynamics at household level has tendency to contribute to increased risks of Gender Based Violence (GBV) and illicit sexual relations with minors from local communities. Rural communities have limited access to health facilities and support services for GBV/SEA survivors Workers and community	• Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways • Dedicated ESS and GBV/SEA experts will be recruited/ assigned within the implementing agencies • Training staff, establishing clear policies • Civil servants to be guided by the public service Code of Conduct	• GBV action plan monitoring • Completed GRM logs/ registers • Training logs • ESS and GBV/SEA staff • Code of conduct forms signed by each staff	Gender Div. MCDSS	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		volunteers may also be at risk of GBV/SEA/SH.				
All project phases	Exclusion of Vulnerable Groups	Gender exclusion and lack of meaningful consultations and participation with some stakeholders (such as people living with disabilities, marginalized women, the young and elderly) Constrained by lack of support from their household.	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Design targeted programs to ensure equitable distribution of cash transfers	• SEP monitoring and reporting • Meetings in local languages • Disclosure platforms used • Cash distribution modes	Gender Div. MCDSS	10,000
All project phases	Labor including forced/trafficked and or child labour	Poor labour and working conditions may impact adversely on the workers in the project. Failure by contractors to abide by national legislation & ESS2 requirements. OHS risks affecting workers.	A Labour Management Procedure (LMP) has been developed to address the OHS and labour issues relating to direct and contracted workers and community volunteers (see Annex 4)	• LMP monitoring and reporting • No.of complaints from the Worker GRM • No. of reports related to labour issues	Gender Div. MCDSS	10,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
Cash handling	Security Risks	Cash transfers can increase the risk of theft or violence, especially if beneficiaries are carrying or storing significant amounts of cash. There is potential OHS risks associated with the Social Cash Transfer (SCTs) method of payment mainly Payment Point Mangers (PPMs)	A Security Management Plan has been developed (see Annex 3) which articulates mitigations measures including: • examine vulnerabilities • limiting the amount of cash carried by any one PPM • PPM security protocols and emergency training • implement secure methods for cash distribution, such as digital transfers • establish partnerships with local law enforcement, amongst others.	• Security management plan monitoring and reporting • Training logs • Incident reports	Gender Div. MCDSS	150,000
Production activities	Occupational Health Safety and Security Risks (OHS)	General OHH accidents on the work sites The shift to productivity is more demanding and can impact women's physical and mental health due to increased workloads or stress, and this may cause incidents.	• Promote work-life balance and provide access to health services and mental health support. Encourage practices that prioritize women's well-being and safety. • Implement comprehensive occupational health and safety (OHS) training for the women. Establish safety protocols and use of PPE. • Provide training on handling and storage of hazardous materials.	• No. of mental and health support systems • Sensitization programs on health and safety (No.) • PPE use • Safety protocol established in the project	Gender Div. MCDSS Beneficiaries	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
All project phases	Increased Consumption and Generation of Solid Waste	Direct cash transfers, delivery of educational materials and transitioning to enterprises can lead to increased consumption, higher waste generation and environmental degradation.	• Provide training and encourage sustainable consumption practices among beneficiaries • Promote more sustainable practices in agriculture techniques. Encourage the use of renewable energy sources to prevent deforestation for charcoal.	• Training logs • Health checks conducted • Proper waste management	Gender Div. MCDSS Beneficiaries	10,000
All project phases	Chemical, pesticide and fertilizer use	Increase the use of chemicals and pollutants, affecting local ecosystems. Pesticides can affect non-target species, including beneficial insects, wildlife, and plants. Poses health risks to people.	• Provide training on the use integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Use targeted selective pesticides and promote biodiversity. • Provide training to women on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures.	• Sensitization on IPM • Pesticide selection	Gender Div. MCDSS Beneficiaries	50,000
All project phases	Land Use Changes	Expanding productive enterprises might lead to changes in land use, potentially causing	• Adopt conservation land management practices, agroforestry and reforestation initiatives to offset land use changes.	• Land management practices • Training logs	Gender Div. MCDSS Beneficiaries	

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		deforestation, habitat loss, or soil degradation.	• Encourage the beneficiaries to use existing fields.			
All project phases	Inequality and Social Tensions	Exacerbating existing social inequalities or create new tensions if not well-targeted, and they might lead to conflict between beneficiaries and non-beneficiaries. Beneficiaries might face stigma or social exclusion from community members. Cash transfers might be misused or misallocated. Affect family dynamics and intra-household relations, sometimes leading to conflict including GBV/SEAH. Lack of inclusivity, community support and understanding of the importance of girls' education can	• Use data-driven and transparent criteria for selecting beneficiaries to ensure that the most vulnerable populations are prioritized. • Periodically review and adjust targeting criteria to address emerging needs and avoid creating new inequalities. • Involve community members in the planning and implementation phases to foster understanding. • Establish accessible and impartial grievance redress mechanisms for beneficiaries and non-beneficiaries to voice concerns and resolve disputes. • Facilitate community dialogue sessions to address conflicts and promote understanding between beneficiaries and non-beneficiaries.	• Transparency criteria • Reviews and need assessments • Community engagement • GRM records • Support and counselling services/ providers	Gender Div. MCDSS	20,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		hinder the success of the program, including cultural beliefs and early marriages.	• Run awareness campaigns to educate the community about positive impacts on poverty reduction and community welfare. • Encourage social inclusion by showcasing success stories of beneficiaries. • Conduct regular audits and financial reviews. • Ensure that the program is inclusive and reaches the most disadvantaged girls. Provide additional support services, such as mentorship and counselling, to empower girls academically and socially. • Engage with parents, community leaders, and local organizations to raise awareness about the benefits of girls' education. Conduct community meetings and information sessions to foster a supportive environment.			
	Cultural Risks	Cash transfers might not align with local cultural practices or traditions, leading to	• Incorporate cultural sensitivity aspects when designing and implementing cash transfer program to	• No of Engagement meetings with local leadership	Gender Div. MCDSS	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		social friction. If the program does not consider local customs related to financial management might be less effective or even disruptive.	ensure they are well-received and effective. Involve local leadership in the planning and implementation stages to gain support and ensure cultural alignment. • Consider traditional meeting places or trusted community centres	• Sensitization in local languages and documentation of feedback • Training logs • Support services		
Nutrition/ WASH initiatives **WASH Infrastructure Rehabilitation Risks**	Construction risks	Screening form to be completed to identify risks (Annex 8)	• Complete the E&S screening form and update the ESMP, if necessary	• Completed screening form for each site	Gender Div. MOH	30,000
Nutrition/ WASH initiatives **WASH Infrastructure Rehabilitation Risks**	Waste generation	The process of rehabilitating WASH facilities can generate construction waste, which may include debris, concrete waste, packaging materials, and old fittings, and even generation of hazardous waste from decommissioned sanitation facilities. Asbestos will not be decommissioned at	• Implement effective waste prevention, reduction, recycling, and disposal practices during construction and operation. • Implement segregation of waste and proper disposal of each waste type. • Dispose of inert waste at the local designated disposal site in conjunction with the local council. • Identify and safely handle hazardous waste from decommissioned sanitation facilities, using ZEMA certified hazardous waste disposal	• Waste management, collection and disposal • Waste segregation • Engagement of waste management contractors	Gender Div. MOH	50,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		any point on the project.	companies to ensure safe and compliant disposal.			
Nutrition/ WASH initiatives WASH Infrastructure Rehabilitation Risks	Material sourcing	The rehabilitation and installation of WASH infrastructure requires raw materials and energy, which can have a significant environmental footprint.	• Source raw materials from sustainable suppliers. • The project will not open any new borrow pits.	• Sustainable suppliers	Gender Div. MOH	-
Nutrition/ WASH initiatives WASH Infrastructure Rehabilitation Risks	Disruption of operations at the facility	Temporary disruptions in PHC Facility operations. Rehabilitation activities may also impact local ecosystems if not well managed.	• Plan and implement the rehabilitation in phases to minimize disruptions to PHC facility operations.	• Planned works communicated to the facility representatives	Gender Div. MOH	-
Nutrition/ WASH initiatives WASH Infrastructure Rehabilitation Risks	OHS risks	OHS risks, accidents are possible at the construction sites.	• Implement on-site OHS management measures to promote occupational and public health. • Use safety signage Use appropriate PPE	• OHS plan • Number of signage installed • PPE register	Gender Div. MOH	50,000
Nutrition/ WASH initiatives WASH Infrastructure Rehabilitation Risks	Biodiversity and soil	Soil disturbances and erosion Vegetation disturbances	• Implement measures to control erosion and sediment runoff, such as silt fences, sediment traps, and vegetation cover, to protect	• Limited clearing • Rehabilitated sites • Erosion control	Gender Div. MOH	In BoQ

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
			nearby water bodies and soil quality. Limit vegetation clearing to rehabilitation sites only. Rehabilitate open areas at decommissioning.			
Nutrition/ WASH initiatives **WASH Infrastructure Rehabilitation Risks**	Noise and Air quality	Noise and dust impacts may be produced at the work sites.	• Dust Suppression by regularly spray water construction areas and materials. • Install physical barriers, such as dust screens, enclosures for specific areas, demolition sites or material storage. • Ensure noise levels do not exceed acceptable levels for a heath facility (75db). Install noise barriers around noisy equipment and sites. • Select and use equipment designed to operate at lower noise levels. Regularly service machinery to prevent excessive noise. • Schedule noisy activities during times when health facility operations are minimal or less sensitive. • Use clear signage to inform health staff and patients about construction activities and potential OHS risks.	• Dust suppression • Physical barriers • Controlled noise levels • Equipment maintenance • Signage in place • Schedule of work	Gender Div. MOH	50,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
Component 2: Keeping Girls in School and Beyond						
All project phases	Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	Altering power dynamics may contribute to increased risks of SEA) resulting in illicit sexual relations with minors from local communities.	• Active implementation of the SEP and the GRM (Annex 2) • Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways	• SEP, GRM and GBV action plan monitoring • Completed GRM logs/ registers • Training logs • ESS and GBV/SEA staff	Gender Div. MOE	30,000
All project phases	Exclusion of Vulnerable Groups	Gender exclusion and lack of meaningful consultations and participation with some stakeholders. Constrained by lack of support from their household, especially over adolescent girls.	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media • Design targeted programs to ensure equitable distribution of benefits	• SEP monitoring and reporting • Meetings in local languages • Disclosure platforms used • Cash distribution modes	Gender Div. MOE	10,000
All project phases	Solid waste generation	Higher enrolment can lead to increased waste generation.	• Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting.	• Waste segregation practiced • Waste collection for disposal and conversion,	Gender Div. MOE Beneficiaries	50,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
				reuse and recycling		
All project phases	Hazardous waste	Higher enrolment may lead to the use of more reusable sanitary towels. But some girls may still purchase more non reusable towels due to empowerment. Reusable sanitary towels require regular washing, which requires reliable water supply, inadequate cleaning of reusable sanitary towels can lead to health risks, there can be generation of biohazard waste and blood contaminated water.	• Educate the pupils on efficient washing practices to minimize water use. Ensure that users have access to sufficient clean water and sanitation facilities. • Include private, safe, and hygienic spaces for washing and drying sanitary towels. • Ensure comprehensive education on the proper hygiene, safe disposal practices and set up designated collection points for biohazard waste and used cleaning water. • Promote biohazard waste management system to handle blood contaminated water and materials • Collaborate with local authorities and MoH to ensure that wastewater treatment facilities can handle blood-contaminated water. Promote the use of bio-digesters or similar technologies for on-site treatment in rural areas; a	• Training logs • Available WASH facilities for sanitary towel use • Biohazard waste management system • Waste collection points • Hazardous waste service providers	Gender Div. MOE Beneficiaries	150,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
			designated well-constructed soak pits where the blood water can be treated/ disinfected water before disposal.			
All project phases	Inequality and Social Tensions	Exacerbating existing social inequalities or create new tensions if not well-targeted, and they might lead to conflict between beneficiaries and non-beneficiaries. Lack of inclusivity, community support and understanding of the importance of girls' education can hinder the success of the program, including cultural beliefs and early marriages.	• Involve community members in the planning and implementation phases to foster understanding. • Establish accessible and impartial grievance redress mechanisms for beneficiaries and non-beneficiaries to voice concerns and resolve disputes. • Facilitate community dialogue sessions to address conflicts and promote understanding between beneficiaries and non-beneficiaries. • Run awareness campaigns to educate the community about positive impacts on poverty reduction and community welfare. • Encourage social inclusion by showcasing success stories of beneficiaries.	• Transparency criteria • Reviews and need assessments • Community engagement • GRM records • Support and counselling services/ providers	Gender Div. MoE	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
			• Engage with parents, community leaders, and local organizations to raise awareness about the benefits of girls' education. Conduct community meetings and information sessions to foster a supportive environment.			
Component 3: Supporting Women's Livelihoods for Climate-Smart Productive Inclusion						
All project phases	Gender based Violence, Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH)	Altering power dynamics at household level has tendency to contribute to increased risks of Gender Based Violence (GBV) and illicit sexual relations with minors from local communities. Rural communities have limited access to health facilities and support services for GBV/SEA survivors Workers and community volunteers may also be at risk of GBV/SEA/SH.	• Ongoing preventive measures under the GBV Action Plan (Annex 1) including sensitization, awareness, and training strategies with clear referral pathways • Dedicated ESS and GBV/SEA experts will be recruited/ assigned within the implementing agencies • Training staff, establishing clear policies	• GBV action plan monitoring • Completed GRM logs/ registers • Training logs • ESS and GBV/SEA staff available	Gender Div. MCDSS	50,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
All project phases	Exclusion of Vulnerable Groups	Gender exclusion and lack of meaningful consultations and participation with some stakeholders (such as people living with disabilities, marginalized women, the young and elderly) Constrained by lack of support from their household.	• Implement the SEP and ensure regular dissemination of information on project status, using appropriate means such as use of local language to cater for different groups • Implement SEP on use of various media • Design targeted programs to ensure equitable distribution of cash transfers	• SEP monitoring and reporting • Meetings in local languages • Disclosure platforms used • Cash distribution modes	Gender Div. MCDSS	30,000
All project phases	Labor including forced/trafficked and or child labour	Poor labour and working conditions may impact adversely on the workers in the project. Failure by contractors to abide by national legislation & ESS2 requirements. GBV/SEAH. Inadequate implementation of OHS measures affecting direct,	• A Labour Management Procedure (LMP) has been developed to address the OHS and labour issues relating to direct and contracted workers and community volunteers (see Annex 4)	• LMP monitoring and reporting • No. of complaints from the Worker GRM • No. of reports related to labour issues	Gender Div. MCDSS	50,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		contracted & community workers.				
All project phases	Occupational Health Safety and Security Risks (OHS)	General OHH accidents on the work sites The shift to productivity is more demanding and can impact women's physical and mental health due to increased workloads or stress, and this may cause incidents. The women and their workers may be exposed to hazardous materials, including chemicals, dust. Ergonomic risks such as musculoskeletal disorders.	• Promote work-life balance and provide access to health services and mental health support. Encourage practices that prioritize women's well-being and safety. • Implement comprehensive occupational health and safety (OHS) training. Establish safety protocols and use of PPE. • Provide training on handling and storage of hazardous materials. • Implement regular health checks	• No. of mental and health support systems • Sensitization programs on health and safety (No.) • PPE use • Safety protocol established in the project	Gender Div. MCDSS Beneficiaries	50,000
All project phases	Increased Consumption	Direct cash transfers, delivery of educational materials and transitioning to enterprises can lead	• Training • Encourage sustainable consumption practices among beneficiaries Promote more sustainable practices in agriculture techniques.	• Training logs • Health checks conducted •	Gender Div. MCDSS Beneficiaries	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		to increased consumption, higher waste generation and environmental degradation.	Encourage the use of renewable energy sources to prevent deforestation for charcoal.			
All project phases	Waste generation	Increased enterprise production activities can lead to higher waste generation, and industrial by-products which are not safely disposed of. Institutions and systems under improved delivery of services, digitalization may generate e-waste.	• Conduct education campaigns to address myths and stigmas about menstruation. • Partner with manufacturers committed to sustainable practices, and quality products. • Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting. • Implement waste management practices. • Set up collection points for used chemical containers and work with waste management companies or the manufacturers of the chemicals. • Provide training on safe handling and disposal procedures.	• Training logs • Available WASH facilities for sanitary towel use • Waste collection points • Hazardous waste service providers • Waste collection for disposal and conversion, reuse and recycling	Gender Div. MCDSS Beneficiaries	150,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
			• Provide training on the responsible use and maintenance of digital devices to minimize damage and extend their usable life. • Establish e-waste collection points in communities to ensure that faulty electronic devices are properly recycled.			
All project phases	Chemical, pesticide and fertilizer use	Increase the use of chemicals and pollutants, affecting local ecosystems. Pesticide runoff can contaminate soil and water resources, affecting local ecosystems and biodiversity. Pesticides can affect non-target species, including beneficial insects, wildlife, and plants. Poses health risks to people.	• Provide training on the use integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Implement buffer zones and proper waste disposal practices to prevent contamination. • Use targeted selective pesticides and promote biodiversity. • Provide training on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures.	• Sensitization on IPM • Buffer zone implementation • Pesticide selection	Gender Div. MCDSS Beneficiaries	50,000
All project phases	Resource Pressure and Impacts on Ecosystems	Increased purchasing power might put pressure on local natural resources,	• Promote and support local conservation initiatives to protect natural resources. For instance, establish programs	• Track the impact of increased economic activity on local	Gender Div. MCDSS Beneficiaries	50,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		overuse of local water sources or deforestation for agricultural expansion into previously untouched areas, leading to habitat loss, due to increased demand.	that focus on, water use, sustainable water management and forest conservation. • Collaborate with local governments and organizations to enforce policies that regulate the use of natural resources.	resources and adjust policies accordingly • Reports from partner institutions		
All project phases	Land Use Changes	Expanding productive enterprises might lead to changes in land use, potentially causing deforestation, habitat loss, or soil degradation.	• Trainings for women to adopt conservation land management practices, agroforestry and reforestation initiatives to offset land use changes. • Encourage the beneficiaries to use existing fields.	• Land management practices • Training logs	Gender Div. MCDSS Beneficiaries	-
	Inequality and Social Tensions	Exacerbating existing social inequalities or create new tensions if not well-targeted, and they might lead to conflict between beneficiaries and non-beneficiaries. Beneficiaries might face stigma or social exclusion from	• Use data-driven and transparent criteria for selecting beneficiaries to ensure that the most vulnerable populations are prioritized. • Periodically review and adjust targeting criteria to address emerging needs and avoid creating new inequalities.	• Transparency criteria • Reviews and need assessments • Community engagement • GRM records • Support and counselling	Gender Div. MCDSS	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		community members. Funds might be misused or misallocated. Affect family dynamics and intra-household relations, sometimes leading to conflict including GBV/SEAH.	• Involve community members in the planning and implementation phases to foster understanding. • Establish accessible and impartial grievance redress mechanisms for beneficiaries and non-beneficiaries to voice concerns and resolve disputes. • Facilitate community dialogue sessions to address conflicts and promote understanding between beneficiaries and non-beneficiaries. • Encourage social inclusion by showcasing success stories of beneficiaries. • Conduct regular audits and financial reviews.	services/ providers		
All project phases	Cultural Risks	If the program does not consider local customs related to financial management it might be less effective or even disruptive. Transitioning to more productive	• Incorporate cultural sensitivity aspects when designing and implementing cash transfer program to ensure they are well-received and effective. • Involve local leadership in the planning and implementation	• Cultural appropriate design of project activity • Engagement of local leadership • Training logs • Support services	Gender Div. MCDSS	30,000

Activity	Aspect	Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
		enterprises for women might alter household roles and responsibilities, potentially leading to changes in family dynamics and labour distribution.	stages to gain support and ensure cultural alignment. • Set up distribution points in locations that are culturally and geographically convenient for beneficiaries. • Consider traditional meeting places or trusted community centres. • Provide support services and trainings to help women balance their new business responsibilities with household duties.			

5.1. ESMP Implementation, Monitoring and Reporting

Implementation arrangements for Environmental and Social Management Plan are essential to ensure that the community social cash transfers (SCT), Keeping Girls in School (KGS), women's empowerment program, and rehabilitation of WASH facilities at selected health facilities are implemented responsibly and in compliance with environmental and social safeguards. Below is a tailored framework for ESMP implementation across these programs.

The PIU will establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the project including a qualified Environmental and Social Specialist and resources to support the management of ESHS risks and impacts of the Project at the provincial and local levels. The project will maintain existing PIUs established under the Girls' Education and Women's Empowerment and Livelihoods (GEWEL) project and establish and maintain additional PIUs (MoH and Gender Division) under GEWEL 2 as set out in the Financing Agreement.

The existing PIUs will maintain current E&S specialists. The MoH shall assign an Environmental and Social Specialist no later than ninety (90) days after Project Effectiveness and thereafter maintain these positions throughout Project implementation. The contractors engaged and sub-contracted entities on site will have an E&S Officer and an HSE officer to implement the ESMP measures, monitored by the relevant PIU E&S Specialists. Contractors will ensure compliance with environmental and labour standards during rehabilitation works. Table 7-2 and Table 7-3 below outline the implementation schedule and monitoring of the ESMP implementation plan. It follows the impacts and mitigations identified in Section 6 above and provides the performance indicators, monitoring requirements, frequency as well as responsibility for monitoring.

Table 5-2: Project ESMP Implementation Structure

Role	Responsibilities	Reporting Line
ESS Project Lead (Gender Division)	• Overall oversight of ESMP implementation • Coordinate between ministries Ensure compliance with national, ESF and international standards • Consolidate E&S reports • Report to stakeholders and high-level authorities	Reports to PIU
E&S Specialists (MoH, MoE and MCDSS)	• Implement ministry-specific ESMP activities • Conduct environmental and social assessments • Monitor and report on E&S performance • Implement the E&S safeguards instruments • Engage with stakeholders • Ensure compliance with relevant legislation • Conduct ESS capacity building activities • Conduct SEP implementation and oversee GRM implementation • Complete the E&S screening form for WASH facilities prior to works (MoH)	Report to the ESS Project Lead
Project Steering Committee	• Provide strategic direction and support for the project • Review and approve E&S reports and findings	Consists of senior representatives from relevant ministries and key stakeholders
World Bank ESS Team	• Provide E&S due diligence	

	• Review and approve E&S reports and findings	
Field Implementation Team	• Execute on-the-ground activities related to the ESMP • Collect data for monitoring and reporting • Address immediate E&S concerns in the field	Report to the E&S Specialists
Contractor E&S Officer & Contractor HSE Officer	• Implement ESMP measures and in charge implementation and monitoring of Environmental, Health and Safety measures	Report to the E&S Specialists Report to the PIU
Stakeholders and Communities	• Engage with project-affected communities • Provide feedback on ESMP implementation • Beneficiaries will implement ESMP management measures relevant to them • Participate in consultations and awareness programs	Feedback is relayed to the E&S Specialists and Project Lead

Table 5-3: ESMP reporting

Material Measures and Actions		**Timeframe**	**Responsible Entity**
Monitoring and Reporting			
A	Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s). MOH will ensure that the screening checklist is prepared and the site specific ESMP using the template included in this ESMP is prepared for the rehabilitation of the health centres. OHS risk assessment will be completed for each task.	Submit quarterly reports to the Bank every 3 months throughout the Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 45 days after the end of each calendar quarter.	Gender Division MoH
B	**INCIDENTS AND ACCIDENTS** Promptly notify the Association 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, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be	Notify the Bank no later than 48 hours after learning of the incident or accident. A preliminary report on action taken will be provided within 7 days. Subsequently, a detailed report will be provided within 30 days after learning of the incident or accident.	MCDSS, Gender Division, MoH, and MoE.

Material Measures and Actions		Timeframe	Responsible Entity
	taken to address it, and any information provided by any contractor as appropriate. Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.		
C	**CONTRACTORS' MONTHLY REPORTS** Require contractors and supervising consultants to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit the monthly reports to the Association as annexes to the quarterly reports to be submitted under action A above.	MoH

5.2. Management of Contractors

MoH will during the preparation of procurement documents and before the start of activities by contractors incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures (LMP), and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. The contracts shall include penalties for noncompliance of ESHS requirements and specifications. They will supervise contractors throughout Project implementation. The ESS staff shall be adequate and approved by the MoH and the Bank. The required ESS staff under the contractor to implement the ESMP measure is shown below in Table 7-4:

Table 5-4: Contractor ESMP implementation Schedule

Roles and Personnel for Contractor ESMP Implementation

Role	Responsibilities	Required Qualifications
Project Manager	• Overall responsibility for project execution and ESMP implementation. • Ensures resources are allocated for ESMP activities. • Compile and send implementation progress reports to the PIU's E&S Specialist	Engineering background with management experience.
Environmental Officer	• Monitors environmental aspects of the project (air, water, soil quality, waste management). • Ensures compliance with environmental regulations and mitigation measures. • Responsible for proper waste handling and disposal according to ESMP. • Ensures recycling and hazardous waste protocols are followed. • Periodic reporting and internal audits. Reports to be sent to the E&S Specialist under	Environmental science/engineering background.

Role	Responsibilities	Required Qualifications
Social and Community Liaison Officer	• Ensures social issues are addressed (community engagement, grievance mechanisms, social impacts). • Manages stakeholder engagement and social risk assessments. • Oversees labour management issues including contractor workforce policies, working conditions, and rights. • Ensures compliance with labour laws and fair treatment of workers. • Acts as a point of contact between the project and the local community. • Facilitates local community consultations and grievance redress mechanisms. • Periodic reporting and internal audits. Reports to be sent to the E&S Specialist under PIU.	Social sciences background or related field. Community relations or public administration experience.
Health and Safety Officer	• Implements Occupational Health and Safety (OHS) protocols. • Conducts OHS training, audits, and risk assessments. • Periodic reporting and internal audits. Reports to be sent to the E&S Specialist under	Safety management or engineering background.
Site Engineer	• Supervises construction activities while ensuring that environmental and social safeguards are incorporated. • Periodic reporting	Engineering background (civil, electrical, mechanical).
HR/ Labor Relations Officer	• Oversees labour management issues including contractor workforce policies, working conditions, and rights. • Ensures compliance with labour laws and fair treatment of workers. • Periodic reporting. Reports to be sent to the E&S Specialist under	Human resource or legal background.
Procurement Officer	• Ensures all suppliers and subcontractors comply with the ESMP. • Monitors supply chain for environmental and social compliance. • Periodic reporting	Supply chain or procurement experience.
Monitoring and Evaluation (M&E) Specialist	• Tracks ESMP performance indicators and provides feedback for continuous improvement. • Prepares progress reports for management and stakeholders. • Periodic reporting. Reports to be sent to the E&S Specialist under	M&E or project management background.
Security Officer	• Ensures the safety and security of the project site, personnel, and community.	Security management experience.

Role	Responsibilities	Required Qualifications
	Implements security measures to prevent vandalism or theft during construction and operation phases. • Periodic reporting. Reports to be sent to the E&S Specialist under	
Subcontractor Supervisors	• Ensure that all subcontractors follow the ESMP and related mitigation measures in their specific areas of work.	Relevant field expertise (construction, electrical, etc.)

5.3. E&S Obligations

The PIU will:

- Adopt and implement the Environmental and Social Management plan (ESMP) prepared for the Project to assess and manage the environmental and social risks and impacts of the project, consistent with the relevant ESSs. Without limitation to the foregoing, include the requirements of the general EHSGs on waste management and OHS in the ESMP and Labour Management Procedures.
- Adopt and implement the subproject site-specific ESMPs for WASH rehabilitation activities.
- Adopt the ESMP no later than ninety (90) days after Project Effectiveness, and thereafter implement the ESMP throughout Project implementation.

5.4. Capacity Building and Training for ESMP Implementation

The ESMP preparation identified institutional capacity gaps with regards to the capacity to implement E&S management measures. Training of the E&S Focal point persons should be organised before project implementation to cover ESS requirements, and the ESMP requirements.

5.5. Waste Management Plan

The Hazardous Waste Management Plan has been included in Annex 5 and Annex 6 to manage hazardous and non-hazardous wastes on the project, consistent with ESS3. The waste management plan (WMP) applies to all project beneficiaries that will be supported by the GEWEL 2 on how to manage non-hazardous and hazardous waste streams. The WMP has been mandated by the national waste management legislation, the project Environmental and Social Commitment Plan (ESCP) and the World Bank ESS3: Resource Efficiency and Pollution Prevention and Management to identify and mitigate potential environmental and social risks and impacts related to management of hazardous and non-hazardous. The WMP addresses the management of all waste streams related to agricultural activities – chemicals, solid, and liquid waste, including hazardous and non-hazardous waste likely to be generated under GEWEL 2 project activities. This plan covers the preparation, construction, and implementation phases of subproject activities.

5.6. Integrated Pest Management Plan

The Integrated Pest Management Plan is included under Annex 7 to manage the use of pesticides consistent with ESS 3, ESHGs and GIIP. The GEWEL 2 will adopt and implement the Integrated Pesticide Management Plan as part of the ESMP to manage pesticides consistent with ESS 3, ESHGs and GIIP. An Integrated Pest Management (IPM) plan is crucial in a social cash transfer project when such programs support agricultural activities. Cash transfers will support the beneficiaries invest in farming, potentially increasing the use of pesticides, herbicides, and other agricultural chemicals. An IPM plan will ensure that these chemicals are used sustainably and that pest management practices are environmentally sound and safe for communities. IPM refers to a mix of farmer-driven, ecologically based pest control practices that seeks to reduce reliance on

synthetic chemical pesticides. It involves: (a) managing pests (keeping them below economically damaging levels) rather than seeking to eradicate them; (b) integrating multiple methods (relying, to the extent possible, on nonchemical measures) to keep pest populations low; and (c) selecting and applying pesticides, when they have to be used, in a way that minimizes adverse effects on beneficial organisms, humans, and the environment.

5.7. Security Management

The Security Management Plan (SMP) has been prepared in Annex 3(a) to provide and maintain a safe physical environment and manage staff activities to reduce the risk of personal injury and property loss during the implementation of the GEWEL 2 Social Cash Transfer (SCT) component. The plan describes how security will be organized to face identified threats and how to be continuously reassessed and reorganized in correlation with security situations and operations being undertaken. The SMP covers sub-project activities relating social cash transfers in the Social Cash Transfer (SCT) and nutrition, Keeping Girls in School (KGS), Supporting Women's Livelihoods (SWL) and the Capacity building components.

The GEWEL 2 PIU will ensure that security procedures and criteria are fully designed and updated, and the means fully available to ensure the security for project operations. It will also leverage in using the existing national and local security infrastructure to access and share security related information. In addition, and working with the National Police Service, the DSWO will specifically identify and address security risks in the community engagement activities that can pose a threat to Project staff, mainly Pay Point Managers (PPMs) engaged in cash disbursement activities. The PPMs will inform the nearest police officers for support in case of any emerging security threats they cannot handle.

In addition, a SMP for education grant payments developed by MoE is included as Annex 3(b). Its purpose is to prevent and minimize risks such as theft, fraud, exploitation, gender-based violence (GBV), data leaks, and operational disruption that may arise for the payment of the education grant to KGS learners. The SMP establishes a security management structure, assigns roles and responsibilities to stakeholders, and outlines physical and operational security measures. Main content includes risk identification, mitigation strategies for payments, incident reporting, and grievance redress mechanisms.

5.8. Labour Management Procedures

The Labour Management Procedures (LMP) have been prepared for GEWEL 2 to identify the main labour requirements and risks associated with the project and help the government to determine the resources necessary to address project labour issues and in doing so, promote sound worker-management relationships and enhance the development benefits of a project by treating workers fairly and providing safe and healthy working conditions for the direct, contracted workers, community workers and primary supply workers.

LMP (Annex 4) is a living document and may be adjusted as the project advances and as new categories of workers become involved in the various activities.

6. PROCEDURES AND IMPLEMENTATION ARRANGEMENTS

GEWEL 2 will use existing institutional and implementation arrangements from the current phase of GEWEL, with adjustments based on learning and new activities.

- The GEWEL PSC will provide strategic guidance and oversight, while the PTC will support project-specific governance, coordination, technical, and operational issues, report to the PSC on key GEWEL 2 progress and challenges, and update the proposed SP Sector Coordination Committee, as appropriate.
- The current institutional arrangements at the provincial, district, and community levels will remain unchanged, with districts to be capacitated to take on a more effective implementation role. Specific TA and capacity- building support may be provided by the World Bank during implementation, in collaboration with cooperating partners.The institutional and implementation arrangements are detailed below.
- Existing Project Implementation Units (PIUs) within MCDSS will implement the Nutrition-Sensitive SCT (Subcomponent 1.1) and SWL (Component 3).
- The MoH will be newly engaged as an implementing agency for Nutrition-Specific Activities (Subcomponent 1.2) and will have a lean PIU that will not only be responsible for implementation, but also for updating the NFNC and nutrition partners on GEWEL 2-specific nutrition activities.
- The current KGS PIU within the MoE will implement KGS (Component 2), and the Gender Division will take the lead on ISSB (Component 4) related to girls' and women's empowerment, as well as support project-specific governance, coordination, and cross-cutting activities.
- MCDSSDepartment of Planning and Information (DPI) will support overall SP sector coordination under ISSB (Component 4), whilethe MCDSS Department of Information, Communication and Technology (ICT) will support digital systems strengthening (Component 4).

Given the multi-sectoral nature of the proposed GEWEL 2 activities, implementation will prioritize close collaboration and coordination with key government institutions and cooperating partners. For example, engagement with partners, such as the NFNC, UNICEF, World Food Programme and other key implementers, donors, and stakeholders,will be critical for the implementation of nutrition activities, as well as for SCT, KGS and SWL activities. In addition, close collaboration with relevant ministries such as MLGRD, MoA, and MSME will be key, as will be collaboration with the private sector, among others. Lastly, established relationships with current bilateral donors that are co-financing the first phase of GEWEL will still be maintained, given their expressed interest to supporting GEWEL 2 and provisionally indicating a totalamount of approximately US$36.8 million equivalent to the management and implementation of the project.[17]

GEWEL 2 will use the existing institutional and implementation arrangements from the current phase of GEWEL, with adjustments based on learning and new activities. The project institutional arrangements will include a PSC to provide strategic guidance and oversight, as well as a PTC to promote coordination and technical support at the project level. The PTC will be responsible for also updating the PSC on GEWEL results and challenges, as well as informing the proposed SP Sector Coordination Committee on GEWEL issues. The project implementing agencies are MCDSS, MoH, MoE, and Gender Division, with project implementation embedded within existing government structures and coordination platforms for longer term sustainability of efforts. Thus, many of the PIU staff are civil servant secondees, and all implementation from the provincial-level onward is led by career civil servants. This section details the function of three committees,

[17] Initial discussions with donors have noted their possible agreement to extend the current GEWEL MDTF to also co-finance GEWEL 2, potentially in support of the implementation of the SCT, nutrition activities, KGS, and SWL, as well as for World Bank's TA support and evidence generation.

overall coordination structure, and the roles and responsibilities of each agency in the implementation of project activities.

The PSC will consist of the Permanent Secretaries (PSs) of the four implementing agencies, as well as other relevant ministries such as Ministry of Finance and National Planning, MLGRD, MSME, MoA, and others, as appropriate. It will be chaired by the Secretary to the Cabinet and will meet quarterly. The ToR for the PSC will be revised by the Gender Division and submitted to the World Bank for review and No Objection.

An SP Sector Coordination Committee has been proposed by the cooperating partners to better coordinate the GEWEL 2 and the UN-JPSP, as well as other programs in the SP sector, as relevant. It is envisioned that this committee will provide broader coordination on key strategic issues relevant to the SP sector, as they relate to GEWEL 2 and the UN-JPSP activities and have a wide multi-sectoral membership from the GRZ, cooperating partners, and NGOs, chaired by the PS MCDSS. The GEWEL 2 PTC would be responsible for informing this committee on GEWEL issues, and it is expected that the same will be done by the UN-JPSP Technical Consultative Forum. The development of the ToR for this committee is anticipated to be led by UNICEF as the lead for the UN-JPSP, in close collaboration with other United Nations agencies relevant to the SP sector, as well as the World Bank, MCDSS, and relevant government institutions and cooperating partners, as appropriate.

The PTC will be responsible for supporting project-specific governance, coordination, and operational support, including but not limited to, consolidated reporting on project results under the quarterly project narrative progress reports. It will also be responsible for supporting the convening of the PSC meetings, as well as updating the PSC on GEWEL results and challenges and informing the proposed SP Sector Coordination Committee on GEWEL issues. The Technical Committee will be chaired by the Director of Planning in Gender Division, with membership from each project coordinator from the implementing agencies and will meet quarterly. The ToR for the PTC will be revised by Gender Division and submitted to the World Bank for review and No Objection.

Subcomponent 1.1 (Nutrition-Sensitive Foundational SCT) will be implemented by an existing PIU[18] under Department of Social Welfare (DSW) of MCDSS. The PS MCDSS will provide overall guidance and oversight of the subcomponent and serve as the controlling officer for the management of the funds and supervision of activities. The SCT PIU includes the project coordinator; project manager; and officers in charge of management and implementation, MIS, FM, procurement, M&E, communication, and E&S/GRM/GBV, and additional expertise may be on-boarded under GEWEL 2, based on need. At the provincial and district level, the PIU is supported through existing MCDSS civil servants. Specifically, each province has a Provincial Social Welfare Officer, a Senior Social Welfare Officer, and a Provincial Accountant who support coordination, quality control, FM, and other operational issues related to project implementation. District activities are led by the DSWO who manages the accounts at the district levels and oversees the activities of the community structures, supported by Assistant Social Welfare Officers. The DSWO reports to the Provincial Social Welfare Officer, serves as a member of the District Development Coordinating Committee (DDCC),[19] and is also the secretariat of the District Welfare Assistance Committee (DWAC).[20] Lastly, the SCT is carried out with extensive support from community structures, particularly the CWACs, which provide support to SCT and other SP programs in targeting, payments, and monitoring. The chairpersons and secretaries of the CWACs also sit on the Area Coordinating Committees, responsible for monitoring and coordinating the CWACs. Policy guidance to the SCT will be provided by the Poverty and Vulnerability Reduction Cluster Advisory Group under the 8NDP, which oversees SP programming in Zambia.

[18] All staff besides the PIU members are civil servants who provide part of their staff time to SCT activities.

[19] The DDCC consists of heads of the GRZ ministry district departments, as well as heads of nonstate actors and private sector organizations.

[20] DWACs are composed of volunteer representatives of the GRZ ministries, NGOs, churches, and community-based organizations.

Subcomponent 1.2 (Nutrition-Specific Activities for Demand Creation and Service Provision) will be implemented by a lean PIU that will be established by GEWEL 2 under the Directorate of Public Health of the MoH and will comprise a project coordinator, nutrition specialist, and M&E specialist. All other key operational positions, particularly those related to fiduciary and E&S, will be supported by dedicated qualified officers within the relevant departments in the MoH, with knowledge and familiarity with the implementation of World Bank-funded projects. The MoH PIU will also be responsible for updating the NFNC and other nutrition partners on GEWEL-specific nutrition issues to ensure that project-supported nutrition activities are well coordinated and aligned with other relevant efforts by partners in the sector. The PS Donor Coordination of the MoH will provide overall guidance and coordination for this subcomponent, with PS Administration serving as the controlling officer for the management of project funds. At the provincial level for the province(s) of the two project districts, public health specialists will support coordination, quality control, and other operational issues related to project implementation. At the district level in the two project districts, public health officers will support and oversee the activities of the PHC facilities. At the PHC level, the health facility in charge will manage, coordinate, and supervise all nutrition and WASH activities in the PHC facilities and surrounding areas, and the CBV focal points at the PHC facilities will be specifically responsible for managing, facilitating, and ensuring quality assurance of the CBVs' performance. At the community level, CBVs will be responsible for conducting all demand creation activities with community members and households, with priority given to those SCT households receiving the nutrition cash top-ups.

Component 2 (KGS) will continue to be implemented by the existing PIU[75] under the Department of Planning and Information of the MoE, with the overall management provided by the Director of Planning. The PS Administration will provide overall guidance and oversight of this component as the controlling officer for the management of the funds and supervision of activities. The KGS PIU team includes the KGS Coordinator and Assistant Coordinator, two Program Officers, as well as specialists on case management, communication, M&E, GRM/ GBV/E&S, ICT, and FM. In addition, GEWEL 2 will also on-board a dedicated procurement specialist and an expert to support the development of the school to tertiary education or work transition activities, as well as other experts as deemed necessary. At the provincial and district levels, the PIU is supported through existing MoE civil servants. Specifically, each province has a Provincial Education Officer and a Senior Planning Officer who serves as the focal point person for KGS implementation, complemented by the Senior Education Standards Officer-Guidance and Counselling, Provincial Statistician, Senior Education Officer, Open and Distance Learning Officer, Data Entry Operator, and a Provincial Accountant, all responsible for the planning, coordination, implementation, and monitoring of KGS activities.

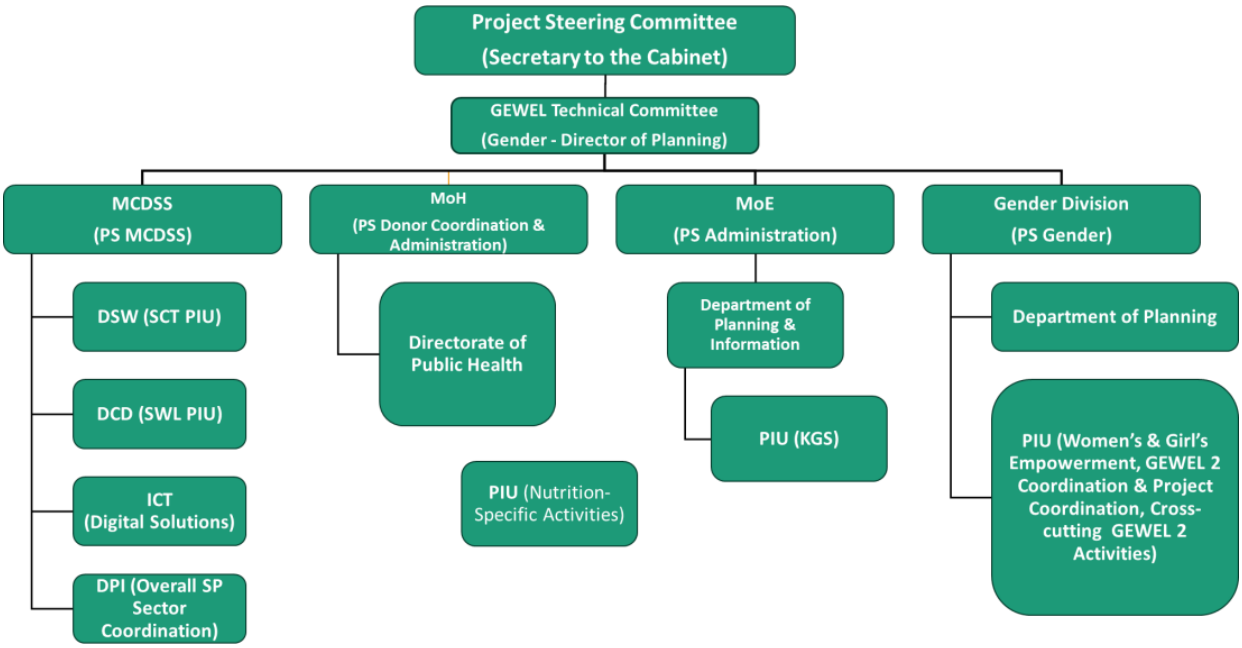
District activities are led by the District Education Board Secretary (DEBS), with support from the District Planning Officer, Assistant Statistical Officer, District Guidance and Counselling Coordinator, and the District Resource Centre Coordinator. The DEBS serves as a member of the DDCC and DWAC and works closely with the DSWOs to ensure that the targeting of KGS girls from SCT households is done in the most effective way. At the school level, Head Teachers, supervised by the DEBS, ensure smooth implementation of the KGS activities, working in close collaboration with the Guidance and Counselling teacher, who is also the KGS focal point person. To ensure effective community engagement, the schools operate through the parent-teacher committees. Policy guidance to the KGS will be provided by the Human and Social Development Cluster Advisory Group under the 8NDP, which oversees education programming in Zambia.

Component 3 (SWL) will be implemented by the existing PIU under the Department of Community Development of MCDSS, with the Director of Community Development providing day-to-day management of SWL activities. The PS will provide overall guidance and oversight of this component and serve as the controlling officer for the management of the funds and supervision of activities. The SWL PIU includes the SWL Manager and specialists in charge of targeting, training, savings, communication, GRM/GBV/E&S,

payments, FM, procurement, M&E, and ICT. Additional expertise may be on- boarded under GEWEL 2, based on need. At the provincial and district levels, the PIU is supported through existing MCDSS civil servants. Specifically, each province has a Provincial Community Development Officer, a Senior Community Development Officer, and a Provincial Accountant who support coordination, quality control, FM, and other operational issues related to project implementation. District activities are led by the District Community Development Officer (DCDO), with support from Assistant Community Development Officers. The DCDO manages the accounts at the district levels, oversees the activities of the community structures, and serves as a member of the DDCC and DWAC, working closely with the DSWOs to ensure that the targeting of SWL women from SCT households is done in an effective manner. Under GEWEL 2, the DCDO will also be tasked with collaborating with officers from the MLGRD for linking SWL beneficiaries to the CDF, MSME for linking to cooperative services, and MoA for linking to extension services. At the community level, SWL implementation is conducted by the Community Development Assistants, who report to the DCDO, with support from community volunteer structures, such as the CWACs and existing cooperatives in the community. Policy guidance for the SWL will be provided by the Poverty and Vulnerability Reduction Cluster Advisory Group under the 8NDP, which oversees the SP programming in Zambia.

Component 4 ISSB-Gender Division will be implemented by a lean PIU that will be established under GEWEL 2, will comprise a project coordinator, procurement specialist, communications specialist, and M&E specialist, and will operate under the Director of Planning's overall management. The PS Gender will serve as the controlling officer for the management of funds and oversight of activities. Policy guidance for the work by Gender Division under GEWEL 2 will be provided by the Human and Social Development Cluster Advisory Groups under the 8NDP and other clusters where the Gender Division is a member, given the cross-cutting nature of the division.

Component 4 ISSB-MCDSS will be implemented through two departments under MCDSS. Specifically, the DPI will be responsible for the activities related to the overall SP sector coordination, while the Department of ICT will lead on IT systems development. All GEWEL 2 Component 4 ISSB activities under MCDSS will be undertaken by existing civil servants in the two responsible departments, working collaboratively with the other implementing agencies and PIUs, as appropriate. (Figure 8-1).



Note: DSW = Department of Social Welfare; DCD = Department of Community Development

Figure 6-1: GEWEL 2 Institutional and Implementation Arrangement at the National Level

GEWEL 2 will continue close collaboration and coordination with key government institutions and partners, which will be critical to successful project design and implementation. Given the multi-sectoral nature of the activities, engagement with partners, such as the NFNC, UNICEF, World Food Programme and other key implementers, donors, and stakeholders, will be critical for project implementation, as relevant. In addition, close collaboration with MLGRD, MSME, and MoA will also be important, as well as the private sector, among others. Lastly, established relationships with bilateral donors that currently co-finance the GEWEL project will still be maintained, given their expressed interest to continue supporting the next phase of GEWEL.

The World Bank will provide the implementation support and TA necessary to help the Government achieve the PDO. The World Bank will bring in expertise in the technical areas of project activities, as well as in cross-cutting areas of fiduciary, E&S, M&E, grievance redress, GBV, communications, and others, as needed. It will also provide training and guidance on procurement, FM, and social and environmental management, among others. Implementation support and oversight to project activities will be provided through regular communication and meetings, implementation support missions (ISMs) and technical missions, midterm review, and project completion evaluation. Cooperating partners will alsobe engaged to participate in all relevant implementation and TA support as well as oversight mechanisms, as appropriate.

The World Bank will continue to conduct semi-annual ISMs, jointly with the Government. The missions will be in person, hybrid, or virtual and with or without field visits, as appropriate. The objectives of the ISMs will be to review implementation progress and track progress toward the PDO, as well as of fiduciary performance and compliance with Environmental and Social Framework. Training will be provided to support the implementing agencies and PIUs build andmaintain capacity. The World Bank will hold monthly technical meetings with the implementing agencies on their specificcomponents, as well as on cross-cutting issues of GRM, GBV, communications, and others, as deemed necessary.

7. STAKEHOLDER ENGAGEMENT, DISCLOSURE, AND CONSULTATIONS

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here: *https://www.gender.gov.zm/?page_id=1629* . The SEP was disclosed on February 1, 2024. Further, the Environmental and Social Commitment Plan (ESCP) prepared for this project, was also been disclosed on February 22, 2024

To ensure the effective management of stakeholder concerns and complaints, a Grievance Redress Mechanism (GRM) the GRM for GEWEL 1 has been adopted This will ensure that stakeholders have accessible channels for feedback and grievances, fostering transparency, trust, and accountability throughout the project lifecycle. The SEP ensures continuous communication, consultation, and participation of stakeholders (e.g., beneficiaries, local communities, workers, and government) while the he GRM provides stakeholders with structured channels to raise concerns or complaints and ensures timely resolution. As part of stakeholder engagement activities, public awareness campaigns on the use of the GRM will be conducted, particularly targeting beneficiaries and vulnerable groups

7.1. Grievance Mechanism

A grievance redress mechanism is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely manner and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with redress and helps address issues at an early stage. The objective of the GRM is to satisfactorily address complaints (grievances) from beneficiaries and non-beneficiaries of the GEWEL program. The goals of the GRM are to ensure people use the system, staff understand what is going well or poorly with program design and implementation, and communication messages around the GRM are tested and improved. The GRM is expected to address eight categories of complaints: Exclusion; Inclusion; Payment; Service Standards; Fraud and Corruption; Serious, including Gender Based Violence (GBV); and Other. The GRM for the current GEWEL project has been extended to GEWEL 2, allowing stakeholders to provide feedback on project impacts and mitigation measures. It will also include a Labor GRM for project- related workers to raise workplace concerns as required under Environmental and Social Standard 2. The project grievance process will involve: (a) registration of complaints through the available mechanisms, including anonymously; (b) registration of complaints by a focal person using a logbook; (c) referral of complaints; (d) establishment of an appeals structure; and (e) closure of the grievance following the appropriate procedure. The project will harness the existing Grievance Redress Mechanism operational manual established under the GEWEL (see Annex 2).

8. CONCLUSION AND RECOMMENDATIONS

In conclusion, the Environmental and Social Management Plan (ESMP) for the GEWEL 2 components outlines a comprehensive approach to mitigating potential environmental and social risks while maximizing the program's benefits for vulnerable populations. The implementation of the Environmental and Social Management Plan (ESMP) for the Component 1: social cash transfer, nutrition initiatives and WASH rehabilitation; Component 2: Keeping Girls in School; and Component 3: Supporting Women's Livelihoods will ensure that the environmental and social risks associated with these programs are managed effectively.

The negative impacts and risk are moderate, site-specific and manageable. By incorporating robust stakeholder engagement, monitoring mechanisms, and clear mitigation strategies, the ESMP ensures that the program adheres to environmental and social safeguards requirements of the nation and of the World Bank's ESF. This plan fosters transparency, reduces negative impacts, and promotes sustainable development, thereby aligning the program's components with both national regulatory requirements and international best practices. Ultimately, effective implementation by the responsible institutions of the ESMP will enhance the program's positive outcomes while safeguarding the environment and community well-being.

The SCT initiatives are designed to alleviate poverty and improve the livelihoods of vulnerable groups while promoting financial inclusion. However, potential environmental and social risks such as solid waste generation due to increase in purchasing power, labour risks, GBV risks, fraud, security concerns during fund disbursement, and lack of stakeholder engagement. The ESMP emphasizes the need for robust monitoring of funds disbursement, stakeholder engagement, grievance redress mechanisms and fraud prevention to ensure that the program achieves its intended outcomes. Additionally, attention is given to the social impacts on beneficiaries, including ensuring that vulnerable groups are adequately consulted and supported throughout the program. A security management plan, waste management plan, LMP, GRM Manual and GBV Action Plan have been prepared. Promotion of digital devices and processes may increase the generation of electronic waste which will have to be handled according to the regulatory requirements, and the e-waste management plan.

The WASH rehabilitation component targets the improvement of water, sanitation, and hygiene infrastructure at health facilities and surrounding beneficiary communities, promoting better health outcomes. The ESMP outlines measures to manage labour and construction-related impacts such as noise, dust, and waste generation, ensuring occupational health and safety (OHS) and minimizing disruptions to local ecosystems. aimed at improving water, sanitation, and hygiene facilities in clinics and communities, has a significant environmental footprint, particularly in construction and the use of resources. The ESMP provides clear guidance on minimizing construction waste, protecting local water sources of these project. Social aspects include improving community health and ensuring that rehabilitated facilities meet the needs of vulnerable groups, particularly women and children. It also ensures long-term sustainability through community engagement and capacity-building efforts, with the inclusion of an OHS management plan, community health management plan, emergency preparedness plan, site demobilisation/ decommissioning plan and site risk assessment forms, to be adapted and updated by the project. An LMP has been prepared for GEWEL 2.

The KGS for schoolgirls aims to enhance the dignity and health of girls by promoting menstrual hygiene management and reducing absenteeism from school, thereby keeping girls in school and beyond. While the generation of biowaste and improper cleaning practices pose risks, these are mitigated through hygiene education programs and proper waste management strategies proposed in the ESMP in collaboration with other stakeholders such as the local councils and MoH. Environmental concerns related to waste

management, particularly with disposable products, are mitigated through awareness programs and the promotion of reusable sanitary towels where feasible. The social focus remains on improving health and education outcomes for girls, ensuring the program aligns with gender empowerment objectives.

Finally, the SWL initiative seeks to transform subsistence farming into more productive and profitable enterprises. The ESMP outlines the potential environmental risks associated with increased agricultural activity, such as soil degradation, pesticide use, and waste generation. Mitigation measures focus on sustainable farming practices, integrated pest management, and soil conservation techniques. Socially, the program contributes to gender equality, improved livelihoods, and food security, aligning with broader national and global development goals. An Integrated Pest Management plan has been prepared.

In conclusion, this ESMP provides a comprehensive framework to manage environmental and social impacts while maximizing the positive outcomes of each component taking into consideration the national regulatory requirements, World Bank ESF and good international industrial practices. Successful implementation of the mitigation measures, regular monitoring, and active stakeholder participation will ensure that the objectives of GEWEL 2 and ESS standards are met.

Annexes

Annex 1: GBV ACTION PLAN

Action	Responsible Party	Timeline	Frequency	Comment/Status
Improve functionality of GRM-GBV Focal Points in all the districts **- Implement harmonized training to community level**	GBV-GRM Officers	June 30, 2024	Selection happens once in a year	• All 116 districts to have females as GBV- GRM focal points
- Selection and Validation of Female FPs in 35 districts where the exercise has not been undertaken yet		May 31, 2024		• Selected Focal Points trained in GBV-GRM. The training activity happens at district level
Implement Annual Harmonized ToT on GBV andGRM **- Train province and district level Focal Points** **- Regional Trainings (GEWEL GBV/GRM TOT). Onetraining in each province for District GRM Focal Points all GEWEL implementing Districts**	GBV-GRM Officers	June 15, 2024		• This is a harmonized training activity for all GEWEL implementing components and is undertaken in regions

Action	Responsible Party	Timeline	Frequency	Comment/Status
Training of officers (HQ level) on revised GEWELGBV/GRM-MIS	GBV-GRM Officers	June 30, 2024	Annual	• To be undertaken as scheduled
Training of officers in SRGBV and Case Management - **Conduct TOT for HQ staff** - **GEWEL Regional Training in SRGBV and Case Management. These Trainings will happen in all 10 regions**	GBV-GRM Focal Point	December 31, 2024		• Not yet due
Undertake regular monitoring of GRM and GBVProvisions	GBV-GRM Officer & Gender Division	June 30, 2024	Midyear and last quarter of the year	• This monitoring activity will be specific to GRM and GBV provisions. It will involve holding a few meetings with community level FPs in smaller groups
Implement GRM and GBV National Symposium for all components - **i.e., undertake a GBV-GRM fact finding field trip develop an action plan on the findings of field trip** - **hold virtual a symposium with key stakeholders and hold a physical symposium to validate**	GBV-GRM Focal Points	September 9, 2024 October 31, 2024	Annual	• Virtual symposium with key stakeholders to identify areas of harmonization for all GEWEL implementing components. • Hold physical symposium to validate Keytake aways of virtual symposium to be used for further strengthening of the

Action	Responsible Party	Timeline	Frequency	Comment/Status
findings, mitigation measures, and proposals for a harmonized GEWEL GBV-GRM - **Hold physical symposium to validate findings**				GEWEL GBV-GRM. Key takeaways included;
Monitor and document lessons learned from SWL Engaging Men Activity implemented during Phase 5 and 6	GBV-GRM Officers	May 15, 2024		• Discussion with men in smaller groups to get feedback on their involvement in LS trainings
Finalize roll-out of Referral Pathways - **Print referral pathway directories** - **Awareness on GBV Dashboard** - **Connect Dashboard to GBV Call centre**	GBV-GRM Officers / Gender Division	December 31, 2024		• Ensure referral pathway directories are delivered to all 116 districts

Action	Responsible Party	Timeline	Frequency	Comment/Status
Establish GBV Call centre - **Operationalize the Government operated GBV call centre** - **Develop community sensitization program on new toll-free line**	Gender Division	December 31, 2024		• Study Visit was undertaken to Brazil on thecall centre • Procurement of initial call centre equipment commenced • Refurbishment of identified space was commenced by Ministry of Infrastructure and Housing province BOQ • TORs for Call centre staff shared with theWB • The Gender Division is preparing for a robust communication plan to create awareness on the GBV toll free line 944. the concept note will be shared with the world bank by April 30, 2024
Training and awareness raising of MCDSS - **Adapt MOE training materials for MCDSS** - **Updated SRGBV action plan and support** - **District preparation of Action Plans based on training** - **Orientation of officers**	GBV-GRM Officers	April 30, 2024		• A training of GEWEL PIUs on GBV was undertaken and a cascading of the trainingto the districts will be undertaken • Training of the provinces and districtspending

Action	Responsible Party	Timeline	Frequency	Comment/Status
Awareness raising/sensitization activities on GBV and SEA/SH prevention and mitigation to SWL and SCT beneficiaries and their communities - **Conduct awareness raising for beneficiaries and their households upon registration on potential risks for household violence due to increased income, existence of GRM and how to report any such incidences** - **Implement 'BRAC engaging men' activity**	GBV-GRM Officers	November - December	Once per year Once per year	• Participate in community radio shows and Gender activism will happen in order to raise awareness on GBV and SEA/SH to commemorate 16 days of Gender activism • Men are currently involved during LBS training under SWL. This happened duringtraining of Phase 5 beneficiaries
Payments - **Ensure payment sites are as close tobeneficiaries as possible** - **Introduce electronic payment where possible** - **Regular meetings to discuss GBV risks with Payment Service providers** - **Revise the MoU with PSPs to**	MCDSS GBV-GRM Focal Point	This activity is currently being rolledout		• Regular discussions are always held withrespective PSPs • Discussions to be held on a regular basis with GBV focal Points with regards to available and reliable PSPs in communities

Action	Responsible Party	Timeline	Frequency	Comment/Status
include a provision on Gender				
GBV-responsive GRM **Expand GRM to all SWL and SCT districts, including:** - **Complaint Boxes** - **Access to the hotline for serious complaints such as GBV, SEA/SH** - **Referral of survivors to GBV services through referral pathways** - **Communications to ensure community members are aware of how to access and usethe GRM** - **Systematic logging of complaints and data management**		December 31, 2024		• Activities listed here are budgeted in the GEWEL GRM except for training of GBV mapping exercise for new districts for newSWL and KGS districts

Action	Responsible Party	Timeline	Frequency	Comment/Status
Training on GBV principles (including survivor- centric approach)				
Survivor Fund - **Confirm linkages with Survivor Fund and Shelters, etc.** - **Document lessons learned from piloting of Survivor Fund**	GBV-GRM Officers	June 15, 2024		• Not yet due
Savings Groups **- Fast track digitization of Savings Boxes**	GBV-GRM Officers SWL Team	This activity is ongoing		• All saving groups being formed will not keep money in the saving box • Revise Savings protocols
Polygamous households **- Need for continued sensitization and follow-up meetings**	GBV-GRM Officers and SWL Team	This activity is ongoing		• Messages are disseminated during the enrolment processes of potential beneficiaries on the program and also during awareness raising meetings on the SCT

Action	Responsible Party	Timeline	Frequency	Comment/Status
Codes of Conduct - **Ensure that assessment of any GBV risks is includein bidding process for contractors, including requirement for Codes of Conduct (need further guidance here)** - **Explore partnership with HR**	GBV-GRM Officers and World Bank	This activity is ongoing		• MCDSS to ensure identified GBV related risks are included in bidding processes forservice contracts and include a clause on GBV in the MoU with PSPs

Annex 2: HARMONISED GRM MANUAL 2024

A harmonized GRM will apply to all aspects of the Project. The GRM is a system that provides a platform for individuals and groups to voice their concerns and seek redress for grievances or complaints. The objectives of the GRM are to ensure that:

(a) beneficiaries and the community use the system

(b) staff understand what is working well or poorly with the program

(c) communication messages about the GRM are improved

Sensitization of beneficiaries and community on GEWEL GRM

The GEWEL GRM is being rolled out to all districts. Sensitization will focus on both the Project beneficiaries and the wider community. Sensitization in schools and the community will be conducted in collaboration with LifeLine/ChildLine Zambia through drama shows, community radio talk shows, public address, physical community meetings and print media. Focal points at HQ, provincial, district and community levels will be trained or retrained on their roles as outlined in the GRM Operational Manual.

(a) District Grievance Focal Points will train Community Grievance Focal Points. This sensitization will include procedures and mechanisms for reporting allegations of SEA.
(b) Communities will select Female Community Grievance Focal Points that are members of the CWAC and who meet standard criteria. This person will champion the importance of the GRM to community members and will raise awareness on the functionality and benefits of the GRM.
(c) Sensitization meetings will be held in schools and will be led by the Guidance and Counselling Teachers in KGS schools

Sensitization of beneficiaries will include messages on GBV, such as the definitions of GBV, SEA and SH, principles of the system, the services available and steps to ensure safety and confidentiality, and what happens once a complaint is lodged.

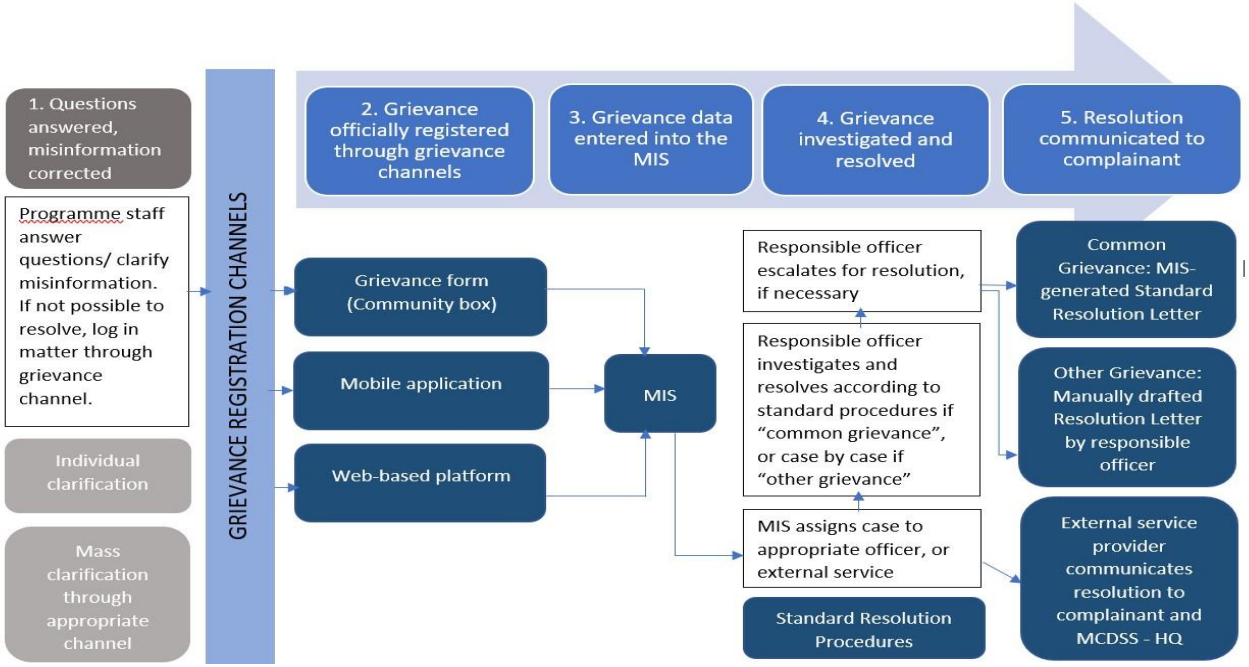
The same topics will be covered during sensitization of the wider community of families of beneficiaries, associations, local NGOs and other community members. Community sensitization will take place with support of the selected Female Focal Points during specific community meetings.

Grievance channels

Standardized paper-based grievance forms can be filled in by the complainant and deposited into a complaint box located at the district offices, with a Female Grievance Focal Point, Guidance and Counselling Teacher or CWAC member. The toll-free line provides free phone counselling to beneficiaries in need of psychosocial support and referral services countrywide for all GBV related cases. Beneficiaries and community members may also submit grievances using social media platforms such as the GEWEL 2 Project website, Facebook, X and WhatsApp.

GRM workflow

The GRM is designed to receive complaints through the four channels outlined above. The procedure for managing grievances is outlined below.



The final harmonised GRM manual is attached here:

Final Harmonized GEWEL GRM Operatic

Annex 3 (a): SECURITY MANAGEMENT PLAN FOR SCT

Table of Contents

Abbreviations

SCT	Social Cash Transfer
SMP	Security Management Plan
GEWEL	Girls Education and Women's Empowerment and Livelihoods
ZISPIS	Zambia Integrated Social Protection Information System
PPMs	Paypoint Managers
OHS	Occupational Health and Safety
DSWO	Department of Social Welfare Office
CWAC	Community Welfare Assistance Committee

1.Introduction

The GEWEL 2 aims to promote human capital development and productivity among poor and vulnerable girls and women, while strengthening adaptive social protection delivery systems. The human capital development aspect of the PDO will be measured through results in three interrelated areas: (a) the SCT as the foundational national social assistance program as an enabler for human capital development, with complementary activities aimed at (b) enhanced educational attainment at the upper primary and secondary school level by vulnerable adolescent girls and (c) improved nutrition outcomes among poor children and women in selected districts. Productivity will be measured through activities aimed at increasing earnings and economic inclusion of adult women to build climate adaptation and shock resilience, while strengthened adaptive SP systems will track results in ensuring effective and accountable delivery of services, with response to climate-induced and other shocks in mind.

1.Objective of the Security Management Plan (SMP)

To provide and maintain a safe physical environment and manage staff activities to reduce the risk of personal injury and property loss during the implementation of the Social Cash Transfer (SCT) component. The plan describes how security will be organized to face identified threats and how to be continuously reassessed and reorganized in correlation with security situations and operations being undertaken. The SMP covers sub-project activities relating social cash transfers in the Social Cash Transfer (SCT), Keeping Girls in School (KGS), Supporting Women's Livelihoods (SWL) components.

1a) Security Approach

Two payment modalities are used under SCT.

(i) Digital (urban) payments model, where the government identified banks for disbursements (such as ZANACO, Atlas Mara, Natsave), and payment service providers such as mobile operators. This accounts for up to 35% of the payments to beneficiaries, and its rollout is still ongoing.
(ii) The rural model is implemented in targeted districts where internet access is a challenge, using PPMs. The proportion of beneficiaries using this mode of payment is 65%. Due to the influx of beneficiaries, the maximum amount of money that can be withdrawn at once by PPMs has been increased from K60000 to a minimum of K100000, which may pose more security risks.

The Cash in transit-bank is sometimes used in conjunction with either one of the modalities, with a selected bank directly going into the community to disburse the funds.

How PPMs work: Onboarding includes the following stages:

(i) Sensitize the communities
(ii) Listing, where the communities self-select themselves and give their details to enumerators
(iii) Community validation, incorporating all the criteria requirements
(iv) Registration and enumeration, where a questionnaire is delivered
(v) Proxy Means Test (PMT) welfare test to rank the socio-economic status
(vi) Second community validation, to inform the community who has/ has not qualify and re-check the details

The payments are made every two months. PPMs travel from their communities to the district bank to collect the money in a priority banking setup. Afterwards, they travel back to their communities to distribute the funds to the beneficiaries using public transport or their private vehicles or bikes. Occasionally, it may be necessary for them to spend a night in the district before returning. They are eligible for travel, overnight, and

meal allowances, as applicable. The payments should be completed within 3 days, with a minimum of two PPMs present at each location, and CWAC members witness the transactions.

The SCT PIU will ensure that security procedures and criteria are fully designed and updated, and the means fully available to ensure the security for project operations. It will also leverage in using the existing national and local security infrastructure to access and share security related information. In addition, and working with the National Police Service, the DSWO will specifically identify and address security risks in the community engagement activities that can pose a threat to Project staff, mainly Paypoint Managers (PPMs) engaged in cash disbursement activities. The PPMs will inform the nearest police officers for support in case of any emerging security threats they cannot handle.

2. Overview of the Security Situation

There is potential Occupational Health and Safety (OHS) risks associated with the Social Cash Transfer (SCTs) method of payment, mainly PPMs carrying substantial amounts of cash being vulnerable to theft and physical harm. Risk Assessment includes i) Threat Identification which includes the internal threats such as fraud, theft, collusion, and data breaches by employees or contractors. External Threats which may include armed robbery, violence, harassment, cyberattacks, and natural disasters, etc. ii) Vulnerability Analysis which includes site security issues such as evaluating physical security measures at the bank, pay points, access controls, and surveillance systems. Transport Security such as assessing risks associated with transporting cash, and beneficiary security such as evaluating the safety of beneficiaries during cash collection.

This security risk has been rated as moderate in terms of likelihood and consequences. The table below shows a risk assessment matrix which works by selecting the appropriate consequences from across the bottom, and then cross referencing against the row containing the likelihood, to read off the estimated risk rating.

Table 0-1: Risk Matrix

Impact

Likelihood

	Negligible	**Minor**	**Moderate**	**Significant**	**Severe**
Very likely	Low Medium	Medium	Medium High	High	High
Likely	Low	Low Medium	Medium	Medium High	High
Possible	Low	Low Medium	Medium	Medium High	Medium High
Unlikely	Low	Low Medium	Low Medium	Medium	Medium High

3. Security Management Plan

Table 0-2: Risk Identification and Management for Rural mode

Risk Issue	Specific Risk Description	Mitigation	Responsibility
Banking	PPMs being observed making a large SCT funds withdrawal when using main banking hall	• Secure Transactions: • PPM to ensure the presence of armed security personnel during cash withdrawal and handling at the bank. • DSWOs expected to establish a collaborative working relationship with the bank manager to ensure he/she understands the nature of the withdrawals and importance of providing discreet service. • PPMs to use secure security bags or unmarked bags/containers to carry cash and do not draw attention to them. Bags should be opaque. • The PPM should not be carrying funds that exceed the maximum unless necessary, and in this case a second PPM should be mobilized • Maintain CCTV cameras to monitor all transaction areas within the bank, ensure they are working. • Keep information/knowledge about cash withdraws ahead of payment days limited to a minimum number of people. • All banking transactions should take place away from the main banking hall (i.e. branch managers office or other) • PPMs should vary the time of day of bank withdrawals so movements and cash transfer patterns cannot be predicted. • Fraud Prevention: • PIU to implement strict verification processes for beneficiaries and pay point managers during cash withdrawal. • PIU to conduct regular audits and real-time monitoring of transactions to detect and prevent fraudulent activities.	PPM District Social Welfare Officer (DSWO)

		• In an event that PPM suspects they are being followed, immediately report to the nearest police station.	
	Banks having insufficient SCT funds for PPMs to make a withdrawal in one day	• If PPM finds that the standards are not met or feels unsafe, they should communicate with their manager/DSWO immediately. • Arrangements must be made prior with the bank before going for withdraws to ensure that they have the money.	PPM DSWO
Cash handling	Cash Handling Protocols	• Transition to digital money transfer systems. • Ensure that cash handling tasks are always performed by at least two employees to reduce the risk of theft or fraud. • Use tamper-evident security seals for cash bags and boxes to detect unauthorized access. • Train employees on secure cash handling procedures, including recognizing counterfeit money and handling cash securely. • Provide training on emergency procedures in case of robbery or other security threat. • Perform daily cash reconciliations to ensure all transactions are accounted for.	PPM DSWO

Travel	PPM staying overnight in a lodge with large sum of SCT funds	• PPM should withdraw a maximum of K100,000.00 at any one time and never travel with more than this amount.
		• Lodges should be considered to be “safe” in line with minimum security standards:
		  ○ Night guard,
		  ○ Availability of a safe
		  ○ Secure locks on rooms
			PPM
			DSWO

	Long distances to be travelled with SCT funds, by own means.	• If a PPM feels vulnerable during travel with funds, a DSW vehicle should be made available. Should a DSW vehicle not be available, consider hiring a vehicle or taxi, with an approved driver based on Driver Approval Guidelines.	PPM DSWO

		• In the case that more than the maximum amount is required, a deputy PPM may be employed, or staggered payment system introduced to that area. • Where possible, the PPM should vary the route being taken to and from the bank.	
	Lack of security when travelling with SCT funds.	• Avoid public transport and/or travel on foot or bicycle. • Where practical and the security situation dictates, the DSW vehicle should be made available for the PPM. • Vehicle assignment should be prioritized for communities which: • PPMs are female • Substantial physical threats • Remote or hard-to-reach. • Use secure, armoured vehicles for cash transportation. • Employ armed escorts for high-risk routes. • Vary routes and schedules to reduce predictability. • Ensure that cash handling tasks are always performed by at least two employees to reduce the risk of theft or fraud. • Use tamper-evident security seals for cash bags and boxes to detect unauthorized access. • Train employees on secure cash handling procedures, including recognizing counterfeit money and handling cash securely. • Provide training on emergency procedures in case of robbery or other security threats.	PPM DSWO
	Poor infrastructure making travel difficult, particularly in the rainy season.	• SCT payments should be planned to take this into consideration, by making more frequent payments ahead of the rainy season. • Avoid allowing payments to accumulate in the case that communities become inaccessible during rainy season.	PPM DSWO
Safe storage	Lack of a secure location within community to store money (No safe)	• All SCT funds shall be kept in a secure location (i.e. safe or strong room) immediately upon arrival at community level and should never be kept in private residences.	DSWO

		• Should a "secure" lodge not be identified, an alternative safe storage location shall be identified, such as a police post or other Government facility. • A Serviceability Audit shall be conducted on all strong rooms and safes to ensure that they are in good working order and/or identify where upgrades or maintenance work is needed. • Should beneficiaries not be available to collect their transfer after 3 days of being notified; funds should be returned to the bank.	

	Safe location storage, key management	• Lodges should be considered to be "safe" in line with the following minimum-security standards:
		  ○ Night guard,
		  ○ Availability of a safe
		  ○ Secure locks on rooms
			PPM
			DSWO

Paypoint	Safe distribution point	• PPM will use barriers and signs to manage queues and prevent overcrowding. • The project will implement an appointment system to stagger beneficiary arrivals and reduce waiting times. • The project will choose pay point locations that are secure and accessible and employ security guards at pay points during cash distribution times.	PPM DSWO
Beneficiary security	Safety of beneficiaries during cash collection	• Provide safe transportation options for beneficiaries traveling to and from pay points, especially in high-risk areas. • PPM should ensure that waiting areas at pay points are safe, with adequate seating and protection from the elements. • PPM should conduct transactions discreetly to protect beneficiaries' privacy and reduce the risk of them being targeted by criminals. • PPM should safeguard beneficiaries' personal information to prevent identity theft and fraud.	PPM DSWO
Fraud	Collecting money on behalf of the beneficiary	• Third party payments must be restricted and these deputies should be screened.	PPM DSWO

		• Confirm that the lists are updated accordingly in case the beneficiary is deceased. • Conduct periodic audits of the beneficiary database to detect and correct inconsistencies or duplications. • Screen CWAC members	
Communication	Notifying Community Welfare Assistance Committees (CWAC) and beneficiaries of pending distribution	• Liaise with CWAC members only when it is time to commence payments. • PPMs should not talk publicly about their role or movements to community members.	PPMs DSWO
	Response to an incident	• PPMs shall be issued with a list of numbers for key security personnel for them to contact in the event of an incident, or if they feel at risk when carrying SCT funds. Guidelines on Incident Reporting Protocols shall be put in place.	PPMs DSWO

4. Security Management

This shall entail some of the key operating procedures which will comprise of:

Personal security: PIU will conduct thorough background checks on all pay point managers and security personnel. Provide regular training on security protocols, emergency procedures, and conflict resolution.

Discreet Services: District Social Welfare Officers are expected to establish a working relationship with the bank manager to ensure he/she understands the nature of the withdrawals and importance of providing discreet service.

Maximum withdrawal: PPM should withdraw a maximum of K100.000.00 at any one time and never travel with more than this amount. In the case that more than the maximum amount is required, a deputy PPM may be employed.

Accommodation: DSWOs to implement certification protocol for lodges.

Safe storage: Should a "secure" lodge not be identified, an alternative safe storage location shall be identified through a Serviceability audit, such as a police post or other Government facility. Restrict access to cash storage areas and ensure only authorized personnel can enter.

Travel: PPMs to avoid public transport and/or travel on foot or bicycle. DSWO to approve drivers in line with Drivers' Approval Guidelines. PPMs to vary route to and from the bank and time of the day for banking withdrawals. Implement procedures for secure cash storage, handling, and transportation.

PPMs to use security bags or unmarked bags/ containers to carry cash.

Distribution Point: 1-2 CWAC members to accompany PPMs and be present during cash distribution. A secure distribution point will be used. Ensure that pay points are located in secure buildings with controlled access, security personnel, and surveillance law enforcement authorities.

Communication: PPM to always alert the bank of expected arrival time. PPM to inform another staff member of expected return time or expected time to deposit the cash in the secure location (i.e. school/clinic safe or strong room) to avoid closure of the school or clinic before PPM arrives.

Digital Social Cash Transfer

To enhance security under the SCT, digital transfer systems are being explored, and the system is running to an extent. Physical presence is required for both distribution and collection, but under digital mode, monies can be transferred electronically, accessible through mobile phones, bank accounts, or e-wallets. There is a reduced risk of theft, robbery, and fraud and lower physical security risk but potential cyber threats and fraud. There are reduced administrative and logistics costs for handling and transporting cash, and reduced transaction and distribution costs once the system is set up. The digital transactions are easier to track, audit, and maintain records of transactions. This option has instant or faster transfers.

Identified Potential Threats: Cyber Threats such as hacking, phishing, malware, and cyber-attacks. Fraud and Identity Theft such as unauthorized access to beneficiary accounts. Operational Risks such as system outages, data breaches, and human errors. Vulnerability Analysis results: Technical Vulnerabilities such as lack of digital infrastructure, outdated software, weak encryption, and unpatched systems. Human Vulnerabilities such as lack of training, social engineering attacks. Process Vulnerabilities such as inadequate verification procedures, weak access controls.

Risk management in the proposed digital money transfer system:

Table 0-3: Risk Identification and Management for Urban mode

Risk Issue	Specific Risk Description	Mitigation	Responsibility
Regulatory and Policy Issues	Lack of supportive regulatory frameworks for digital financial services.	• Work with other government departments and institutions that implement policies that support digital financial inclusion.	DSWO
Flexibility	Different digital payment platforms may not be interoperable.	• Using platforms and systems that provide interoperability between different platforms and financial institutions.	DSWO
Digital infrastructure	Inadequate digital infrastructure in remote or rural areas.	• Invest in expanding mobile network coverage and internet access. Partner with telecommunication companies to improve infrastructure. Finding ways of making sure all beneficiaries have phones and not using a second party to receive the money.	DSWO
Digital literacy	Low levels of digital literacy among beneficiaries, especially in rural areas, women or among older populations.	• Conduct digital literacy training programs and provide user-friendly digital interfaces.	DSWO
Financial Inclusion	Many beneficiaries may lack access to bank accounts or mobile money services.	• Collaborate with financial institutions to open accounts for beneficiaries. Promote mobile money services and ensure they are accessible to all.	DSWO
Cybersecurity	Increased risk of cyber fraud, hacking, and data breaches.	• Implement robust cybersecurity measures, including encryption, multi-factor authentication, and regular security audits.	DSWO
Trust	Beneficiaries may distrust digital payments and prefer cash.	• Build trust through awareness campaigns, demonstrating the benefits and security of digital payments.	DSWO
Technical Support and Maintenance	Need for ongoing technical support and system maintenance.	• Establish technical support teams and maintenance schedules. Partner with tech companies for expertise.	DSWO
Fraud	Impersonation Transaction limits	• Implement robust Know Your Customer (KYC) procedures to verify the identity of beneficiaries. • Use biometric verification methods • Set transaction limits to minimize the impact of potential fraud. • Use strong authentication methods	DSWO
Knowledge	Lack of information	• Conduct awareness campaigns to inform beneficiaries about secure practices and potential scams. • Provide clear mechanisms for beneficiaries to report security concerns or suspicious activities.	DSWO

5. Incidence Reporting

PPMs shall be issued with a list of numbers for key security personnel to contact in the event of an incident, or if they feel at risk when carrying SCT funds.

Immediately raise any security concerns that you have to the Police or your manager.

If you are attacked/ robbed immediately report the crime to the nearest police.

All incidents including robberies, attempted thefts, attempted break-ins, must be reported to the police and DSWO and should be recorded in an occurrence book. The Police with support of the DSWO, will initiate an investigation to determine sequence of events, what may have contributed to the incident, probable cause (s) and contributing factors), and recommendations, corrective actions, and mitigation measures (based on investigative findings). An incident report will be issued to the Project Coordinator with details of the above actions.

Emergency Procedures: Develop and practice evacuation plans for pay points. Maintain updated emergency contact lists for law enforcement, medical services, and program administrators. Install panic alarms at pay points for immediate alert in case of an emergency.

Annex 3 (b): SECURITY MANAGEMENT PLAN FOR KGS

Prepared by Ministry of Education, October 2025

Table of Content:

1. Abbreviations

CCTV	Closed Circuit Television
DCMC	District Case Management Committee
SCMC	School Case Management Committee
DEBS	District Education Boards Secretary
GBV	Gender Based Violence
GEWEL	Girls Education and Women's Empowerment and Livelihoods
GRM	Grievance Redress Mechanism
HQ	Headquarters
KGS	Keeping Girls in School and Beyond Initiative
MIS	Management Information System
MOE	Ministry of Education
NRC	National Registration Card
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PEO	Provincial Education Office
SMP	Security Management Plan

2. Introduction

The Government of the Republic of Zambia (GRZ), with support from the World Bank and Global Financing Facility for Children, Women and Adolescents, is implementing the **Girls' Education and Women's Empowerment and Livelihoods for Human Capital Project (GEWEL 2)**. Within this framework, the **Ministry of Education (MoE)** is responsible for the implementation of the **Keeping Girls in School and Beyond (KGS) Initiative. The KGS** component of GEWEL 2 aims to increase access to upper primary and secondary education for vulnerable girls across the country.

The beneficiaries of this initiative are identified from households enrolled in the **Social Cash Transfer (SCT)** programme. The core objective of the KGS Initiative is to support school attendance and progression by providing **education grants** and paying for school related fees for the targeted girls. The education grants in particular are intended to ensure that recipients have access to essential school requisites, including **school uniforms, books, shoes, and school bags,** etc.

Under the first phase of the **GEWEL project**, the education grant was disbursed through the Ministry of Community Development and Social Services (MCDSS) to SCT beneficiary households hosting KGS girls. In 2021, the grant amount was set at **K252 per girl per year**, equivalent to 14% of the annual SCT transfer. Following a restructuring of the project in 2022, the grant was increased to **K600 per girl per year**. In the current phase **GEWEL 2,** the education grant has been further increased to **K800 per girl per year** and will be administered by the MoE. It is against this background that the Security Management Plan (SMP) has been developed to ensure management of safety and security risks associated with the payment of the education grants. The SMP aligns with national laws, World Bank's Environmental and Social Standards, and Good International Industry Practice (GIIP).

3. Background

The education grant payments are made at the value of K800.00 once per year, per girl. However, due to different enrolment times, the payments will be administered in three phases to allow all the KGS girls to receive the payments. Two digital payment modalities will be used, namely:

(i) The school-based pathway, using Zonal and School Accounting Officers. The maximum amount of money that will be allowed to be withdrawn at once by the Zonal Accounting Officers (ZAO) is K60,000.00, which may pose security risks.

(ii) The parent/caregiver pathway, using government identified banks for disbursements and Payment Service Providers (PSPs) such as mobile operators. This mode will require redeeming at school level to allow parent-teacher-learner interaction.

The school-based pathway will involve the disbursement of funds from the national MoE (headquarters) to the designated KGS Education Grant account at district level. Once the district account has been credited with funds, the district Finance Committee and District Case Management Committees (DCMC) will convene to approve the disbursement of the education grant. After which the ZAO will be authorized to draw the funds by the District Education Board Secretaries (DEBs) in line with the payment requisition.

For districts with commercial banks within its boundaries, the ZAO will travel from their respective schools to the bank to draw funds. The ZAO will then distribute (hand over) the funds to School Accounting Officers (SAO) in the assigned schools. Once the SAO receives the funds from the ZAO, he/she will pay the cash to the parents/caregivers of the KGS girls or Guidance and Counselling (G&C) teachers (the G&C teachers will assist

the learners to buy the required school requisites). The payments should be completed within 5 days, in the presence of School Case Management Committee (SCMC) members.

For districts without commercial banks within their boundaries, the ZAO will travel from their respective districts to the bank in another district to draw funds. Funds can only be drawn on the day of travel to avoid risks of theft overnight, save for exceptional circumstances. Once the ZAO has the funds, he/she will travel back to the assigned schools and handover the funds to the SAO in the home district, and in some cases, pay the cash to the parents/caregivers of the KGS girls or G&C teachers. The payments should be made within 5 days, in the presence of SCMC members.

4. **Objective of the Security Management Plan (SMP)**

This SMP aims to provide guidance for maintaining a safe physical environment and manage staff activities to reduce the risk of personal injury and property loss during the implementation of the education grant payment under the KGS component of the GEWEL 2 project. The Plan seeks to prevent and minimize risks related to **theft, fraud, exploitation, gender-based violence (GBV), data leaks, and operational disruption** during education grant disbursement and reconciliation processes.

The specific objectives of the SMP are to:

(i) Safeguard grant funds from theft, fraud, and misuse;
(ii) Protect learners, staff, and beneficiaries from physical and social threats;
(iii) Ensure compliance with codes of conduct, especially regarding gender-based violence (GBV), sexual exploitation and abuse (SEA), and harassment;
(iv) Promote transparency and accountability in grant management; and
(v) Foster community engagement and trust in the grant process.

The plan describes how security will be organized to face identified threats and how to be continuously reassessed and reorganized in correlation with security situations and operations being undertaken.

5. **Overview of the Security Situation**

There are potential Occupational Health and Safety (OHS) risks associated with the KGS education Ggrant school-based method of payment, mainly Zonal and School Accounting Officers handling substantial amounts of cash being vulnerable to theft and physical harm.

Fraud and corruption, theft, collusion, and data breaches of the confidential beneficiary lists by MoE employees are among other internal threats that may compromise the environment within which payments of the education grants are made.

External threats, which may include armed robbery, violence, GBV/sexual exploitation and above/sexual harassment (SEA/SH), cyber-attacks, and natural disasters, etc., pose serious risks to a safe environment within which payments can be made.

Security risks may also emanate from supporting sites and infrastructure, such as the banks, PSPs, other access controls, and surveillance systems. Furthermore, risks may be associated with transporting cash and cash collection by the beneficiaries.

The risk associated with payment of the Education Grant has been rated as moderate in terms of likelihood and consequences. Table 1.0 shows a risk assessment matrix which works by selecting the appropriate consequences from across the bottom, and then cross referencing against the row containing the likelihood, to read off the estimated risk rating.

Security Rist Assessment

A robust Security Risk Assessment (SRA) should be conducted prior to grant disbursement, covering:

(i) Internal risks: Fraud, collusion, data breaches, and inappropriate behaviour by staff or service providers

(ii) External risks: Armed robbery, violence, kidnapping, cyberattacks, natural disasters, and community unrest.

(iii) Vulnerability analysis: Physical security of school premises, transport of funds, and beneficiary safety during grant-related activities.

A risk assessment matrix is presented below, which works by selecting the appropriate consequences from across the bottom and then cross referencing against the row containing the likelihood of ascertaining the estimated risk rating.

Table1-0: Risk Matrix

Impact

Likelihood

	Negligible	Minor	Moderate	Significant	Severe
Very likely				**Cash handling**	
Likely		**Travel**			
Possible		**Incomplete Retirement**	**Beneficiary security**	**Safe storage**	**Fraud Corruption or Collusion**
Unlikely	**Pay point**	**Communication**	**Loss of Documentation**	**Banking**	

Key ratings:

	Negligible	Minor	Moderate	Significant	Severe
Very likely	Low Medium	Medium	Medium High	High	High
Likely	Low	Low Medium	Medium	Medium High	High
Possible	Low	Low Medium	Medium	Medium High	Medium High
Unlikely	Low	Low Medium	Low Medium	Medium	Medium High

6. Security Approach

The KGS Project Implementation Unit (PIU) will ensure that security procedures and criteria are fully designed and updated, and that appropriate means are fully available to ensure the security for project operations. It will also leverage on using the existing national and local security infrastructure to access and share security

related information. In addition, and working with the National Police Service, the DEBS will specifically identify and address security risks in the community engagement activities that can pose a threat to school staff, mainly Zonal and School Accounting Officers engaged in cash disbursement activities. The Zonal and School Accounting Officers will inform the nearest police officers for support in case of any emerging security threats they cannot handle.

6.1 Guiding Principles

- **Confidentiality:** Sensitive security protocols and incident reports are handled discreetly.
- **Proportionality:** Security measures are tailored to the risk level of each school.
- **Inclusivity:** All stakeholders, including vulnerable groups, are considered in risk assessments and mitigation strategies.
- **Accountability:** Clear lines of responsibility for security oversight and incident reporting.

6.2 Security Management Structure

- **Security Adviser:** Appointed at the project or district level to oversee risk assessments, protocol development, and training.
- **School Management Committee:** Responsible for day-to-day security, monitoring, and reporting.
- **Community Engagement:** Involvement of parent-teacher associations (PTAs), local leaders, and law enforcement in security planning and incident response

6.3. Physical and Operational Security Measures

Physical Security

- Install security lights (preferably solar-powered) and CCTV cameras in high-risk areas.
- Secure storage for cash and grant-related documents (e.g., safes, locked rooms).
- Employ security guards where necessary, especially during cash disbursement or in insecure regions.
- Control access points to school premises during grant activities

Operational Security

- Use bank accounts for grant transfers to minimize cash handling and promote transparency.
- Implement digital tracking systems for grant allocation and expenditure.
- Stagger beneficiary arrivals and use appointment systems to prevent overcrowding and reduce risk during distributions.
- Restrict third-party payments and screen deputies for fraud prevention.

6.4 Prevention Strategies

- Conduct regular security briefings and training for all staff, service providers, and SCMC members.
- Sensitize staff and students on security awareness, GBV/SEA/SH prevention, and reporting mechanisms.
- Use local labour and existing school structures for monitoring in high-risk areas to avoid exposing outsiders to threats.
- Liaise with local law enforcement and community leaders before site visits or grant-related activities.

6.5 Response Strategies

- Maintain updated contact lists for key security personnel, law enforcement, and emergency services.
- Develop and disseminate clear incident response protocols, including evacuation procedures if needed.

- Ensure rapid reporting of security incidents (within one hour for serious cases) to the Security Adviser and Project Coordinator.
- Trigger response protocols and inform relevant authorities (e.g., MoE, police) as required

6.6 Incident Reporting and Grievance Redress Mechanism (GRM)

- Establish confidential, survivor-centric channels for reporting GBV/SEA/SH and other security incidents (e.g., toll-free lines, email, GRM boxes).
- Document all incidents and actions taken and report to the World Bank and national authorities within 24 hours for serious cases.
- Regularly review and update reporting protocols and grievance mechanisms.

6.7 Monitoring and Evaluation

- Conduct periodic audits of grant management and security procedures.
- Monitor implementation of security measures and update the SMP annually or after any major incident.
- Use data-driven practices to inform improvements and emergency response planning

6.8 Special Considerations

- Address risks of exclusion, discrimination, and elite capture in grant management.
- Integrate schools and marginalized groups into security planning.
- Ensure compliance with codes of conduct and provide ongoing training on GBV/SEA/SH prevention

7. Security Management Plan

This shall entail some of the key operating procedures which will comprise of:

7.1 **Personal security:** A background check on all Zonal and School Accounting Officers, SCMC and security personnel. Provide regular training on security protocols, emergency procedures, and conflict resolution.

7.2 **Discreet Services:** DEBS are expected to establish a working relationship with the bank manager to ensure he/she understands the nature of the withdrawals and importance of providing discreet service.

7.3 **Maximum withdrawal:** ZAO should withdraw a maximum of K60,000.00 at any one time and never travel with more than this amount. This is subject to revision depending on the approving authority.

7.4 **Safe storage:** Should a “secure” lodge not be identified, an alternative safe storage location shall be identified through a Serviceability audit, such as a police post or other Government facility. Restrict access to cash storage areas and ensure only authorized personnel can enter.

7.5 **Travel:** ZAO may be accompanied by a fellow ZAO where possible. ZAO to use authorised transport. Zonal Accounting Officers to vary route to and from the bank and time of the day for banking withdrawals. Implement procedures for secure cash storage, handling, and transportation. ZAO and SAO to use security bags or unmarked bags/ containers to carry cash.

In Districts where water transport has to be used, districts are to use suitable and safe water transport.

7.6 **Distribution Point:** A secure distribution point will be used. Ensure that pay points (rooms) are in secure buildings.

7.7 **Communication:** DEBS and ZAO to always alert the bank of expected arrival time. ZAO to inform another staff member of expected return time or expected time to deposit the cash in a secure location (i.e. school safe or strong room) to avoid closure of the school before school accounting officers arrive.

Table 2: Risk Identification and Management for Manual Payment of Grants (School Pathway)

Risk Issue	Specific Risk Description	Mitigation	Responsibility
Banking	ZAO being observed while making a large KGS fund withdrawal when using main banking hall.	Secure Transactions: • ZAO may be accompanied by a fellow ZAO where possible when going to withdraw funds from the bank. • DEBS expected to establish a collaborative working relationship with the bank manager to ensure he/she understands the nature of the education grant transactions and the need to provide discreet banking service (e.g., from branch managers' office). • The ZAO should not withdraw funds that exceed the maximum (K60,000.00) at a time • Maintain CCTV cameras to monitor all transaction areas within the bank, ensure they are working. • ZAO should vary the time of day of bank withdrawals so that movements and cash transfer patterns cannot be predicted. • In an event that ZAO suspect they are being followed, immediately report to the nearest police station. • If ZAO finds that the standards are not met or feels unsafe, they should communicate with their DEBS immediately.	PIU, DEBS, ZAO, Commercial Bank Manager
	Banks having insufficient KGS funds for ZAO to make a withdrawal in one day	• Arrangements must be made prior with the bank before going for withdrawals to ensure that they have sufficient funds.	ZAO, DEBS

Cash handling	Cash Handling Protocols	• Ensure that cash handling tasks are always performed by at least two employees to reduce the risk of theft or fraud. • ZAO to use secure means of moving cash from the bank to the school • Train employees on secure cash handling procedures, including recognizing counterfeit money and handling cash securely. • Provide training on emergency procedures in case of robbery or other security threats. • Loss of funds will attract disciplinary actions on the officers involved in accordance with the financial management regulations • Perform daily cash reconciliations to ensure all transactions are accounted for. • All members of staff involved in the payment process should exercise high levels of confidentiality. • Ultimately transition to digital money transfer systems.	ZAO, DEBS

Travel	ZAO staying overnight in a lodge with large sum of KGS funds	• ZAO should withdraw a maximum of K60,000.00 at any one time and never travel with more than this amount.
		• ZAO should ensure that they withdraw funds early in the day of travel where possible.
		• Lodges should be considered to be "safe" in line with minimum security standards:
		  ○ Night guard,
		  ○ Availability of a safe
		  ○ Secure locks in rooms
		  ○ Availability of alternative source power
			ZAO, DEBS

	Long distances to be travelled with KGS funds, by own means.	• If a ZAO feels vulnerable during travel with funds, he/she should request for safe mode of alternative transport from the DEBS office.	ZAO, DEBS

		• In the case that more than the maximum amount is required, staggered payment system will be introduced to that school. • Where possible, the ZAO should vary the route being taken to and from the bank. • In Districts where water transport has to be used, districts are to use suitable and safe water transport	

	Lack of security when travelling with KGS funds.	• ZAO to use authorized transport.
		• Where practical and the security situation dictates, the school vehicle should be made available for the school accountant.
		• Assignment of motor vehicles should be prioritized for communities which are:
		  ○ SAO is female
		  ○ Substantial physical threats
		  ○ Remote or hard-to-reach.
		• Vary routes and schedules to reduce predictability.
		• Ensure that cash handling tasks are always performed by at least two employees to reduce the risk of theft or fraud.
		• Train employees on secure cash handling procedures, including recognizing counterfeit money and handling cash securely.
		• Provide training on emergency procedures in case of robbery or other security threats.
			ZAO, SAO, DEBS

	Poor infrastructure making travel difficult, particularly in the rainy season.	• KGS payments should be planned to take this into consideration, by making payments ahead of the rainy season.	DEBS, Head Teachers, ZAO, SAO, DEBS, G&C Teachers
	Assault or accident during movement of staff with funds	• Avoid travel before 06:00 hours and after 18:00 hours.	ZAO, DEBS
Safe storage	Lack of a secure location within	• All KGS funds shall be kept in a secure location (i.e. in a safe in a strong room) immediately upon arrival at school level	Ministry of Finance and National

	school to store money (No safe)	and should **NOT** be kept in private residences. • A serviceability audit shall be conducted on all strong rooms and safes to ensure that they are in good working order and/or identify where upgrades or maintenance work is needed. • Should beneficiaries not be available to collect their education grant during the payment period, the SAO should submit the uncollected funds to the ZAO 3 days after payment closure	Planning (MOFNP), DEBS, ZAO, SAO
	Safe location storage, key management	• Strong rooms should be considered to be "safe" in line with the approved minimum standards set by the MoE	DEBS, Head Teachers, ZAO, SAO
School	Safe distribution point	• A secure room will be used at the school as a pay point area • The school administration will implement an appointment system to stagger beneficiary arrivals and reduce waiting times where necessary.	SAO, Head Teachers, DEBS, SCMC
Beneficiary security	Safety of beneficiaries during cash collection	• DEBS/School managers should ensure that waiting areas at pay points are safe with adequate sitting arrangements • DEBS/School managers should conduct transactions discreetly to protect beneficiaries' privacy and reduce the risk of them being targeted by criminals. • School managers and accountants should safeguard beneficiaries' personal information to prevent identity theft and fraud.	SAO, Head Teachers, DEBS
	GBV/SEA/SH of girls during or after payment, or by school authority figures	• All payments must be witnessed by members of SCMC. • G&C teacher or KGS Focal Point must be female. • GBV awareness referral protocols must be in place. • KGS Service Charter must be in place.	SAO, Head Teachers, DEBS, SCMC
	Data Privacy Breach	• Only designated persons (school heads, DEBS, SCMC) to access lists.	MoE HQ, Provincial Education

	Unauthorized disclosure of beneficiary lists		Officers (PEO) DEBS, Headteachers, Zonal and School Accounting Officers
	Community Conflict Tensions between the beneficiaries and non-beneficiaries	• Clear community sensitization on eligibility. • GRM visibility at all levels. • SCMC and Finance Committee trained in conflict resolution.	DEBS, School Headteacher, SCMC
Fraud	Collecting money on behalf of the beneficiary	• Third party payments must be restricted and the G&C teachers, Head teacher or any other person collecting the payment on behalf of the learners should be screened. • Confirm that the lists are updated accordingly in case the beneficiary is deceased. • Conduct periodic audits of the beneficiary database to detect and correct inconsistencies or duplications. **Fraud Prevention:** • PIU to implement strict verification processes for beneficiaries and school accounting officers during cash withdrawal. • PIU to conduct regular audits and real-time monitoring of transactions to detect and prevent fraudulent activities.	SAO, DEBS, KGS PIU
	Funds diverted to ineligible recipients or altered lists	• Dual approvals on all lists (SCMC and Finance Committee). • Biometric identification (ID) checks or original National Registration Card (NRC) presentation. • Spot checks • The G&C teacher can only hand over the funds to guardian of the girl who is registered with the school in presence of the Community Welfare Assistance Committee (CWAC) representative	SAO, G&C teacher, DEBS, KGS PIU

Corruption or Collusion	Officials manipulate payment lists or requisitions	• SCMC and Finance Committee must witness all payments. • Reports and reconciliations submitted to be within 5 days by the ZAO	SAO, SCMC, DEBS
Loss of Documentation	Acquittal sheets lost or destroyed	• Maintain digital backup of scanned payment sheets. • Submit digital copies to DEBS and PEO. • ZAO to keep copies as well	Zonal and School Accounting Officer
Incomplete Retirement	Uncollected or unretired funds are not returned	• Zonal and School Accounting Officers shall retire the funds within the period of 7 days after each closure of payment cycle. • Authority shall be sought in writing from the DEBS' Office for an extension of this period if required; • The funds shall be retired to DEBS' Office by submitting the signed acquittal sheets and bank deposit slips for any funds that are uncollected by the beneficiaries. • The DEBS Office will consolidate and submit the retirement including the Case by Case reconciliations to HQ/PEO; • Eight after funds are disbursed to schools, DEBS will follow up with schools and ZAO for retirements • All the uncollected funds will be recalled within seven days to HQ KGS project account; • The acquittal sheets should be signed by the witnessing SCMC member/s; and • The SAO are expected to submit retirements within 3 days of closing payment.	ZAO, SAO, DEBS
Communication	Notifying schools and KGS girls of pending distribution	• Liaise with KGS girls to inform their guardians to be present for information verification only when it is time to commence payments. • Zonal and School Accounting Officers should not talk publicly about their role or movements to community members.	ZAO, SAO, SCMC, DEBS

	Response to an incident	• SAO shall be issued with a list of numbers for key security personnel for them to contact in the event of an incident, or if they feel at risk when carrying KGS funds.	Zonal and School Accounting Officers, DEBS

8. **Risk Management for Digital Education Grant Payments**

To enhance security under the KGS, digital transfer systems are being developed. Physical presence is required for both distribution and collection, but under digital mode, monies can be transferred electronically, accessible through mobile phones, bank accounts, or e-wallets. While this reduces risks of theft, robbery, fraud, and physical insecurity, it may pose potential cyber threats and fraud. There are reduced administrative and logistics costs for handling and transporting cash, and reduced transaction and distribution costs once the system is set up. The digital transactions are easier to track, audit, and maintain records of transactions. This option has instant or faster transfers.

Identified Potential Threats: Cyber Threats such as hacking, phishing, malware, and cyber-attacks. Fraud and Identity Theft such as unauthorized access to beneficiary accounts.

Operational Risks: system outages, data breaches, and human errors.

Vulnerability Analysis: Technical vulnerabilities such as lack of digital infrastructure, outdated software, weak encryption, and unpatched systems. Human vulnerabilities include lack of training, social engineering attacks. Process vulnerabilities include inadequate verification procedures, and weak access controls.

Table 3: Risk Identification and Management for Digital Education Payments (Parent/Caregiver Pathway)

Risk Issue	Specific Risk Description	Mitigation	Responsibility
Regulatory and Policy Issues	Lack of supportive regulatory frameworks for digital Finance services.	• Work with other government departments and institutions that implement policies that support digital Finance inclusion.	MoE, PIU
Flexibility	Different digital payment platforms may not be interoperable.	• Using platforms and systems that provide interoperability between different platforms and PSP institutions.	MoE, PIU
Digital infrastructure	Inadequate digital infrastructure in remote or rural areas.	• Invest in expanding mobile network coverage and internet access. Partner with telecommunication companies to improve infrastructure. Finding ways of making sure all beneficiaries have phones and not using a second party to receive the money.	MoE, PIU

Digital literacy	Low levels of digital literacy among beneficiaries, especially in rural areas, women or among older populations.	• Conduct digital literacy training programs and provide user-friendly digital interfaces.	MoE, PIU
Finance Inclusion	Many beneficiaries may lack access to bank accounts or mobile money services.	• Collaborate with Finance institutions to open accounts for beneficiaries. Promote mobile money services and ensure they are accessible to all.	MoE, PIU
Cyber security	Increased risk of cyber fraud, hacking, and data breaches.	• Implement robust cybersecurity measures, including encryption, multi-factor authentication, and regular security audits.	MoE, PIU
Trust	Beneficiaries may distrust digital payments and prefer cash.	• Build trust through awareness campaigns, demonstrating the benefits and security of digital payments.	MoE, PIU
Technical Support and Maintenance	Need for ongoing technical support and system maintenance.	• Establish technical support teams and maintenance schedules. Partner with tech companies for expertise.	MoE, PIU
Fraud	Impersonation Transaction limits	• Implement robust Know Your Customer (KYC) procedures to verify the identity of beneficiaries. • Use biometric verification methods • Set transaction limits to minimize the impact of potential fraud. • Use strong authentication methods	MoE, PIU
Knowledge	Lack of information	• Conduct awareness campaigns to inform beneficiaries about secure practices and potential scams. • Provide clear mechanisms for beneficiaries to report security concerns or suspicious activities.	MoE, PIU

9. **Incidence Reporting**

- Zonal and School Accounting Officers accounting officers shall be issued with a list of numbers for key security personnel to contact in the event of an incident, or if they feel at risk when carrying KGS funds.
- Zonal and/or School Accounting officers shall immediately raise any security concern that they have to the Police or their DEBS.
- If attacked/robbed the Zonal or School Accounting Officer shall immediately report the crime to the nearest police station and inform the DEBS office.

- All incidents including robberies, attempted thefts, attempted break-ins, must be reported to the police and DEBS and should be recorded in an occurrence book. The police, with support of DEBS, will initiate an investigation. An incident report will be issued to the KGS Project Coordinator.

Emergency Procedures: Develop and practice evacuation plans for pay points. Maintain updated emergency contact lists for law enforcement, medical services, and program administrators.

10. Conclusion

This SMP is designed to safeguard all aspects of the KGS education grant operations. Through vigilance, transparency, and accountability, it ensures that the program achieves its goal of supporting vulnerable girls to access and complete their education, **free from harm or exploitation**, and with the support of communities and stakeholders.

11. **Annexes:**

11.1 Security Risk Assessment Form Template

Security Risk Assessment Form for Education Grant Programs
Project/School Name: **Date/Time:** **Assessment Conducted by:** **Approved by:**

11.2 Risk Identification

Risk Description	**Who Might Be Harmed & How**	**Existing Controls**	**Risk Rating**	**Further Controls Required**	**Residual Risk Rating**	**Responsibility**
Theft of grant funds during disbursement	Zonal/School Accounting Officers, beneficiaries; physical harm, financial loss	Secure cash handling procedures, bank transfers, surveillance	High	Increase security personnel, staggered payment schedules, cashless payments	Medium	School Accountant, Security Focal Person
Fraud/corruption in beneficiary lists	Beneficiaries, program integrity	Data verification, audit trails, restricted access	High	Regular audits, digital beneficiary management, staff training	Low	MoE Data Manager

Risk Description	Who Might Be Harmed & How	Existing Controls	Risk Rating	Further Controls Required	Residual Risk Rating	Responsibility
GBV/SEA/SH during grant activities	Students, staff, community	GBV/SEA/SH policies, grievance mechanisms	Moderate	Awareness campaigns, safe reporting channels, staff vetting	Low	School Principal, GBV Focal Point
Data breach of confidential information	Beneficiaries, staff	Password protection, limited access	Moderate	Encryption, regular IT audits, staff training	Low	IT Officer
Armed robbery/violence at payment sites	Staff, beneficiaries	Police coordination, secure locations	High	Mobile payments, increased police presence	Medium	School Security Lead
Cyber-attacks on payment systems	Beneficiaries, program	Firewalls, secure platforms	Moderate	Regular system updates, penetration testing	Low	IT Officer
Natural disasters disrupting payment	All stakeholders	Emergency response plans	Low	Disaster recovery planning	Low	District Disaster Committee

11.3 Risk Assessment Matrix

- **Likelihood:** Rare, Occasional, Common
- **Consequence:** Minor, Noticeable, Severe, Devastating
- **Risk Rating:** Low, Medium, High, Very High

Use the matrix to cross-reference likelihood and consequence for each risk.

11.4 Controls and Mitigation Measures

- **Existing Controls:** List current measures (e.g., OHS plan, security protocols, staff training).
- **Further Controls Required:** Specify additional actions needed to reduce risk (e.g., new policies, technology upgrades, increased supervision).
- **Residual Risk Rating:** Reassess after controls are implemented; aim for LOW.

11.5 Monitoring and Review

- **Frequency:** Assess risks periodically and whenever there are changes in operations or external conditions.
- **Responsible Persons:** Assign competent staff to monitor and ensure controls are in place.
- **Reporting:** Document incidents, complaints, and mitigation actions; update the risk assessment as needed.

11.6 Special Considerations for Education Grants

- **School Environment:** Consider risks unique to schools, such as student safety, safeguarding vulnerable groups, and community engagement.
- **Grant Disbursement:** Focus on risks during cash handling, digital payments, and beneficiary verification.
- **GBV/SEA/SH Risks:** Include specific screening and mitigation for gender-based violence and harassment.
- **Grievance Mechanism:** Ensure accessible, confidential, and survivor-centered reporting channels for all stakeholders.
- **Capacity Building:** Train staff on security, risk awareness, and safe practices.

11.7 Incident reporting form

11.8 Code of Conduct Form

Annex 4: LABOUR MANAGEMENT PROCEDURES

1.0 INTRODUCTION

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions, a simplified Labor Management Procedures (LMP) has been developed for the Girls Education and Women's Empowerment and Livelihoods (GEWEL) project (P181391). The LMP sets out the ways in which the MCDSS, MoH and MoE will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to: Identify the different types of project workers that are likely to be involved in the project; identify, analyse, and evaluate the labour-related risks and impacts for project activities; provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, and applicable national legislation.

The LMP applies to all project workers, irrespective of contracts being full-time, part-time, temporary, or casual.

1.1 OVERVIEW OF LABOUR USE ON THE PROJECT

ESS2 categorizes project workers into direct workers; primary supply; contracted workers; and community workers. The labour category of direct workers will be government civil servants, from the Ministry of Community Development and Social Services (MCDSS), Ministry of Health (MoH), Ministry of Education (MoE) and the Gender Division at the national, provincial and district levels. All civil servants are Zambian nationals and will remain governed by the Employment Code Act no. 3 of 2019, the Industrial and Labour Relations Act, Chapter 269 of the Laws of Zambia, Public Service Regulations and Human Resources Manuals. ESS2 will therefore not apply to government civil servants, except for the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety), which fall under the provisions for workers' safety, as provided for in ESS 2.

Direct Workers: The project will engage the following key categories of workers as "direct workers":

Project Implementation Units (PIUs) have been set up and will be maintained throughout the project implementation. These are in the MCDSS, under the Department of Community Development and the Directorate of Social Welfare where there are 11 project staff and 14 project staff respectively, Ministry of Health where there is a PIU, and in the Ministry of Education under the Department of Planning and Information where there are 10 project staff. The project staff have been directly contracted for various positions at least for a period of two years and the contracts are renewable upon job satisfaction. The job skills and experiences among the workers in the PIUs ranges from: programme coordination; programme management and implementation; financial management; data and information management; systems development; planning, monitoring and evaluation; grievances/PSEA/GBV management; gender and communication; case management; procurement and logistics; social cash transfer payments; and environmental and social safeguards among other relevant skills.

Each of the implementing ministries is responsible and accountable for implementation of their component and activities, with the Permanent Secretary as the controlling officer. Each PIU shall be responsible for overall coordination and strategic guidance as well as oversight in all functions.

Civil servants: The PIUs will be supported by the part-time basis Provincial offices responsible for planning, quality control, training, budgeting and budget review; financial and progress reporting as well as oversight on district reporting and sensitization and capacity building activities at provincial level. District offices will oversee the day-to-day implementation, administration, financial management, procurement, monitoring and evaluation of Project with the assistance of Area Coordinating Committees (ACC) with responsibilities of

monitoring and coordinating Community Welfare Assistance Committees (CWAC) and as further detailed in the Project implementation Manual.

Community Workers: these will be community volunteers through community structures including CWACs working in communities where the Social Cash Transfer (SCT) is implemented. Some direct workers working as civil servants have volunteered their time to serve the community as Pay Point Managers (PPMs) who pay beneficiaries on behalf of MCDSS. CWACs and community workers under MoH are community-level structures with members elected by the communities. Their labour will be provided on a voluntary basis with records of the election process, and the specific project activities in which the community volunteers will be engaged. There are 87,776 community volunteers and 4,400 individual public service workers serving as PPMs at national level that are supporting MCDSS on the project.

Contracted workers: these are people employed or engaged through third parties to perform work related to core functions of the project, regardless of location. These will be the workers that will be contracted to undertake WASH rehabilitation works at MoH facilities in the selected two districts.

Primary Supply workers: these apply with regards to the construction workers under the contractor conducting the rehabilitation works under MoH. The typical WASH rehabilitation project may involve the following types of suppliers:

- Construction Materials Suppliers (e.g., bricks, cement, pipes, fittings) - 3 to 5 suppliers
- Plumbing and Sanitary Ware Suppliers (e.g., toilets, sinks, faucets) - 2 to 4 suppliers
- Water Treatment Equipment Suppliers (e.g., filtration systems, pumps) - 1 to 2 suppliers
- Waste Management Services (e.g., disposal of old materials, hazardous waste management) - 1 supplier
- Electrical Suppliers (if electrical work is needed for water pumps or lighting) - 1 to 2 suppliers

Based on the above categories, the estimated number of suppliers could range from 8 to 14 suppliers for one health facility under WASH rehabilitation project. This number may fluctuate depending on specific project needs, local availability of suppliers, and the scale of the rehabilitation work. This will be reported back under the required labour reports on the project.

2.0 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

Key Labour Risks

Potential risks related to labour and working conditions include: Occupational Health and Safety (OHS) risks, Gender-based violence and/or sexual exploitation, abuse, and harassment (GBV/SEA-H) and risk of transmission of HIV/AIDS. The PIU will assess and address these risks by ensuring that the tender process for engaging of contactors to do the works involve assessment of the, procedures and competence of the contractors in managing occupational health and safety., including their compliance levels to the national occupational health and safety legislation, the ESSs, EHSGs and GIIPs. This includes provisions on working conditions, management of workers relationships, occupational health, and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labour, child labour, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. In addition, the PIU will coordinate the training of all workers engaged in project activities, and on the guidelines. The following are key labour risks anticipated during the implementation of the project:

Occupational Health and Safety (OHS) risks: These are risks related to work accidents and incidents for all **project direct workers, including community worker volunteers, contracted workers** engaged in project activities. The risks include the following:

- Physical Hazards: Falls, machinery accidents, collisions, noise and confined spaces.
- Chemical Hazards: Exposure to Hazardous Substances.
- Biological Hazards: infectious diseases, vector-borne diseases
- Ergonomic Hazards: repetitive strain injuries, musculoskeletal disorders
- Psychosocial Hazards: Stress, Violence and Harassment

Mitigation Measures can include:

Conduct regular site risk assessments using the risk assessment form (annex 10 and annex 11 to identify potential hazards. Evaluate the likelihood and severity of identified risks. Implement control measures to eliminate or reduce risks. Worker Training: Regular training on safe work practices, emergency procedures, and use of personal protective equipment (PPE). Ensure availability and proper use of appropriate PPE such as helmets, gloves, goggles, ear protection, and respiratory protection. PPE training on use and maintenance. For rehabilitation sites, develop and enforce safe work procedures for all tasks. Maintain clean and organized work areas to prevent accidents. Use clear and visible signage to indicate hazards, emergency exits, and safety equipment. Regularly monitor workers' exposure to hazardous substances and environments. Develop and implement emergency response plans for potential incidents such as fires, chemical spills, or medical emergencies. Engage with local communities to inform them about project risks and safety measures. Ensure compliance with local, national, and international OHS regulations and standards.

Child labour: Although the risk of child labour is minimal (given the recruitment criteria for all government jobs are persons above 18 years), the risk may emerge through the community labour. Use of children/ young girls who are beneficiaries in the local distribution networks, helping in storage and handling. Children may be engaged in promotional activities or awareness campaigns. Children may be required to perform tasks in exchange for receiving sanitary towels, such as cleaning or assisting teachers. Increased household responsibilities for girls receiving the sanitary towels, potentially leading to missed school days or other forms of labour. There is also a risk of employing under age workers in construction/ rehabilitation works.

Mitigation measures:

Vigorous contractual obligations, implementation of the GRM, effective monitoring and reporting mechanisms, community engagement, school-based initiatives, regular monitoring and evaluation, capacity building on labour laws and requirements, and legal compliance.

Forced labour: Direct forced labour risk is unlikely. However, there may be risks related to use of community worker volunteers, and beneficiaries using forced labour in their activities that result from the project. There is also a risk of coercion or forced labour practices, especially among vulnerable populations in construction.

Labour disputes over terms and conditions of employment. Likely cause for labour disputes includes demand for limited employment opportunities; labour wages/rates and delays of payment; disagreement over working conditions (particularly overtime payments and adequate rest breaks); and health and safety concerns in the work environment. Further, there is a risk that employers may retaliate against workers for demanding legitimate working conditions, or raising concerns regarding unsafe or unhealthy work situations, or any grievances raised, and such situations could lead to labour unrest and work stoppage. The PIU has to ensure that workers are paid fair enumeration in accordance with local labour laws and standards, implement timely and transparent payment processes, provide formal employment contracts outlining terms and conditions of

employment, including wages, working hours, and benefits, provide safe and decent living conditions for workers, including access to clean water, sanitation, and adequate shelter, and establish clear and accessible grievance mechanisms for workers to report issues or concerns without fear of retaliation.

Discrimination and exclusion of vulnerable groups. If unmitigated, vulnerable groups of people may be subject to increased risk of exclusion from employment opportunities under the project. Such groups include women and persons, the elderly, and persons with disabilities (PWDs). Sexual harassment and other forms of abusive behaviour by workers or managers will also have the potential to compromise the safety and wellbeing of the vulnerable groups of workers and the local communities, while adversely affecting project performance.

Sexual harassment, exploitation and abuse: there are several concerns on the potential for GBV, increased risk of abuse and exploitation, especially for vulnerable women workers, among project workers and between project workers and local communities.

Transmission of HIV/AIDS: there are risks related to transmission of HIV/AIDS among project direct workers, community volunteers and the communities in which they will be implementing project activities. The PIU will ensure that sensitisation on HIV/AIDS transmission and continuation of established relevant OHS measures on HIV/AIDS.

Pay Point Managers are also at risk associated with carrying substantial amounts of cash, being vulnerable to theft and physical harm. Mitigation measures for PPMs will be followed as articulated in the Security Management Plan (see Annex 4).

3.0 BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

This section sets out the key aspects of national labour legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers, with particular focus on legislation relating to terms and conditions of employment:

The Employment Code Act No. 3 of 2019 (Employment Code) and the Industrial and Labour Relations Act, Chapter 269 of the Laws of Zambia are the two main pieces of legislation that govern the employment relationship and articulates on equal employment, non-discrimination and child labour. Including the Public Health Act Chapter 265 of the Laws of Zambia, the Public Health Act Cap. 295 of the Laws of Zambia and Occupational Health and Safety Act No 36 of 2010. Zambia has also ratified ILOs ten fundamental Conventions including:

- C029 Forced Labour
- C087 Freedom of Association and Protection of the Right to Organise
- C098 Right to Organise and Collective Bargaining
- C100 Equal Renumeration
- C105 Abolition of Forced Labour
- C111 Discrimination (Employment and Occupation)
- C138 Minimum Age
- C155 Occupational Safety and Health
- C182 Worst Forms of Child Labour
- C187 Promotional Framework for Occupational Safety and Health

a) Zambia's Constitution of 1991 with amendments through 2016

The Part III of Zambia's Constitution covers "Protection of fundamental rights and freedoms of the individual". Article 11 recognizes equality regardless of gender, skin colour, creed or belief, political party, origin, and race. It also recognizes the freedom of assembly, association, expression, etc., and considers the rights of children and protection from expropriation. Article 14 states that "1. No person shall be held in slavery or servitude; 2. No person shall be required to perform forced labour." Article 15 covers protection from inhuman treatment. Cruel treatment and torture are prohibited in Zambia. Article 21 gives provisions about the protection of freedom of assembly and association. Section 1 states that "Except with his own consent, no person shall be hindered in the enjoyment of his freedom of assembly and association, that is to say, his right to assemble freely and associate with other persons and in particular to form or belong to any political party, trade union or other association for the protection of his interests."

The Article 23 (2) states that "no person shall be treated in a discriminatory manner by any person acting by virtue of any written law or in the performance of the functions of any public office or any public authority. (3) In this Article the expression "discriminatory" means, affording different treatment to different persons attributable, wholly or mainly to their respective descriptions by race, tribe, sex, place of origin, marital status, political opinions, colour or creed whereby persons of one such description are subjected to disabilities or restrictions to which persons of another such description are not made subject or are accorded privileges or advantages which are not accorded to persons of another such description.

The Article 24 is about Protection of Young Persons from Exploitation. Section 1 prohibits employment of a young person (under the age of fifteen years) in any occupation or employment which would prejudice his health or education or interfere with his physical, mental, or moral development. Section 2 and 3 give protection for young persons against physical or mental ill-treatment, all forms of neglect, cruelty or exploitation and trafficking of any form.

Further, Article 261 states that "A person holding a public office shall act in accordance with a code of conduct and ethics, as prescribed for that office."

b) The Employment Code Act No. 3 of 2019

Employer-worker relationship

The Employment Code, under the provisions of section 22(1), makes it mandatory for a contract of employment whose duration is for a period of six months or more to be in writing. However, oral contracts are recognized by section 18 of the Employment Code Act.

With respect to employees under an oral contract of employment, the employer has a mandate to ensure that a record of the contract of employment is prepared and maintained. This is provided for under section 18 of the Employment Code Act. Section 21(1), states that an oral contract for a period of one month will be deemed to have been extended for a further period of one-month subject to the same terms and conditions if the employer continues to work past the expiry date of the contract.

The Employment Code provides that where an employer does not notify the employee in writing of the confirmation, it will be presumed that the employee has been confirmed in the position from the date of the expiry of the probation period.

Forced and child labour.

Young children (a person under the age of fifteen years) and young persons (a person who has attained the age of fifteen years, but is below the age of nineteen years) are protected under the Employment Code Act in the following ways:

- Employers are prohibited from employing a child in a public or private industrial undertaking or any branch of the industrial undertaking.
- Employers are prohibited from employing a young child or young person in work which by nature constitutes a "worst form" of labour.
- Employers are prohibited from employing a young person to work at night in an industrial undertaking.

The section 8 of Part I of the Employment Code states that a person shall not engage or subject another person to perform forced labour.

Salaries and deductions

Section 66 of Part IV relates to "protection of wages" it stipulates that an employer shall pay the wages of an employee (f) in accordance with the terms of the contract of employment. The wages of an employee shall fall due and be paid at regular intervals not being later than the fifth day following the date on which they fall due under subsection (1). (4) An employer shall on the termination of a contract of employment, pay an employee all wages additional to basic pay including overtime pay and allowances on the date of termination of the contract of employment. Methods of payment of wages are specified in section 67. (1) "An employer shall pay an employee the wages in the currency of the Republic, except that where an employee so requests, in writing, or if the provisions of any collective agreement or conditions of service applicable to the employee." Article 68 – 69 show provisions for authorized and unauthorized deductions.

Maternity and Family Leave Rights

The Employment Code Act, under the provisions of section 41, provides for 14 weeks' maternity leave. In the event of a multiple birth, the maternity leave will be extended for a further period of four weeks.

A female employee who remains in employment with the same employer for a period of 24 months preceding the beginning of the leave is entitled to full pay where the maternity benefits are not payable under the contract.

The provisions of section 41(4) of the Employment Code Act states that where a female employee has more than one employer or third-party scheme from which the employee is entitled to claim maternity benefits, an employer who pays the maternity benefit is entitled to recover from the other employer or third-party scheme, as a civil debt:

- in the case of another employer, a contribution which shall bear a proportion to the amount of the maternity benefit paid to the employee as the number of days the employee worked for the other employer; or
- in the case of a third-party scheme, the reimbursement of the maternity benefit as may be prescribed.

On expiry of the maternity leave, the female employee is entitled to return to the job she had held before the maternity leave, or to a reasonably suitable job with terms and conditions not less favourable than those which had applied to her before the maternity leave. This is provided for under section 41(7) of the Employment Code Act.

Notwithstanding having taken her maternity leave, the female employee is entitled to annual leave as stipulated under section 41(10) of the Employment Code Act.

Further, the female employee nursing her un-weaned child is entitled, each working day, to two nursing breaks of 30 minutes each, or one nursing break for an hour. It is imperative to state that the nursing break period shall be six months from the date of delivery, and the said break will not be deducted from the number of paid hours of the female employee.

Paternity leave is available to an employee who remains in continuous employment with the same employer for a period of 12 months and such leave shall be for at least five continuous working days. The leave should be taken within seven days of the birth of a child and a birth record of the child should be submitted to the employer. This is provided for under section 46 of the Employment Code Act.

Section 40(1) of the Employment Code Act allows an employee who has worked for a period of six months or more to be entitled to leave of absence, referred to as family responsibility leave, with pay for a period not exceeding seven days in a calendar year to nurse a sick spouse, child or a dependent. An employer, before granting this leave, may require the employee to produce a certificate from a medical doctor certifying that the spouse, child or dependent is sick and requires special attention.

Working hours

Section (1) of Article 74 of Employment Code relates to hours of work. It stipulates that "the normal days' work of a full-time employee (a) shall consist of eight hours of actual work; and (b) may begin on any day of the week, including a public holiday, where that employee works on a public holiday". (2) An employer and an employee, other than a part-time employee, may agree that the employee works more than the stipulated hours without added remuneration if the number of hours covered in a week does not exceed forty-eight hours or a lesser number of hours that may be specified in a contract of employment or collective agreement.

Rest periods

Weekly rests are considered in Article 76. Section (1) stipulates "An employee is entitled to a rest day of at least twenty-four consecutive hours in every period of seven consecutive days". According to section (2), the weekly rest day under section (1) shall be any day in respect of which the employee is not required to work under the employee's contract of employment. Subject to agreement, an employer shall grant to the employee on each working day meal and health breaks.

Leave

Under section 36 of the Employment Act, employees have a minimum of 24 annual leave days, which is paid. Consequently, employees put on annual leave will receive full pay during this period. Similarly, other benefits under contract, and law, continue to accrue.

Section 37 of the Employment Code provides for the formula to be used when computing Annual Leave benefits. Like the non-applicability of section 36, section 37 provides for the computation of how annual leave is to be paid but this is not enforceable as employers are exempt from paying the same to their employees.

Overtimes

Section 75 of the Employment Code provides that an employer is expected to pay their employee's overtime. Subsection (1) stipulates that "an employer shall pay an employee who works in excess of forty-eight hours in a week, one and half times the employee's hourly rate of pay".

Labor conflicts

Part IX of the Zambian Employment Code relates to "Disputes and Breaches of contract". Section (1) of Article 121 gives the conditions under which an aggrieved party may report a matter to an authorized officer. It may include:

- an employer or employee neglects or refuses to comply with the terms of any contract of employment;
- any question, difference or dispute arises as to the rights or liabilities of a party to the contract or as to any misconduct, neglect or ill treatment of the party;
- an injury to a person, or damage to property of the party occurs; or
- an allegation of discrimination under section 5 is made by an employee or prospective employee.

Employees belonging to a trade union may first take their complaint against the employer through a trade union representing them to an organization representing employers, in the hope of settling the claims amicably.

Section 108(2) of the Industrial and Labor Relations Act permits the employee to file a complaint within 30 days of the event which led to the discrimination before the High Court under the Industrial Relations Division.

The section 108(2) provides for an extension of the 30-day period for a further three months, to allow the employee to exhaust all administration channels available.

Employers are at liberty to settle claims at any time before trial. The courts encourage the parties to settle the matter amicably through its mediation rules incorporated in its procedure rules.

Section 121(2) relates that "An authorized officer shall:

- take steps that the authorized officer may consider to be expedient to affect a settlement between the parties and, in, shall encourage the use of collective bargaining facilities, where applicable.
- where an authorized officer fails to affect a settlement between the parties, the authorized officer may recommend that the aggrieved party refers the matter to court.

Right to form an association

Section 52(4) An employer shall not terminate a contract of employment of an employee based on reasons relating to (a) union membership or participation in union activities outside working hours or, with the consent of the employer, within working hours.

Termination conditions

According to the provisions of section 53(1) of the Employment Code, an employee whose contract of employment is intended to be terminated is entitled to a period of notice or compensation in lieu of notice where the employee is not guilty of misconduct or any act which would trigger the employment relationship to terminate. Furthermore, the Employment Code Act provides for default notice periods where the contract of employment does not provide for the same.

However, while section 53(1) permits the employer to terminate the contract with compensation in lieu of notice, section 52 of the Employment Code Act restrains and prohibits an employer from invoking a termination clause without giving valid reasons and section 52(1) of the Employment Code Act provides as follows: "(1) A contract of employment terminates in the manner stated in the contract of employment or in any other way a contract of employment is deemed to terminate under this Act or any other law, except that where an employer terminates the contract, the employer shall give reasons to the employee for the termination of the employee's contract of employment."

Non-discrimination and equal opportunities

Discrimination may be said to be unlawful where an employer discriminates against a female employee on the grounds of her gender or marital status by denying her access to opportunities for promotion, training or any other benefits or facilities, or where the recruitment policies only privilege men despite their unsuccessful applications and interviews.

Article 23(3) of the Constitution of Zambia, Chapter 1, Volume 1 of the Laws of Zambia defines Discrimination as follows: "Discrimination means affording different treatment to different persons attributable, wholly or mainly, to their respective descriptions by race, tribe, sex, place of origin, marital status, political opinions, colour or creed whereby persons of one such description are not made subject or are accorded privilege or advantages, which are not accorded to persons of another such description."

Section 5 of the Employment Code places an obligation on the employer to promote equal opportunity in employment and eliminate discrimination in an undertaking.

Further, section 108(1) of the Industrial and Labor Relations Act prohibits an employer from terminating the services of an employee or imposing a penalty or disadvantage on an employee based on race, sex, marital status, religion, political opinion, affiliation, tribal extraction or status.

The following are the grounds upon which discrimination is prohibited:

- grounds of colour, nationality, tribe or place of origin, language, race, social origin, religion, belief, conscience, political or other opinion, sex, gender, pregnancy, marital status, ethnicity, family responsibility, disability, status, health, culture, economic status; and
- discrimination in respect of recruitment, training, promotion, terms and conditions of employment, termination of employment or other matters arising out of employment.

c) The Public Health Act Chapter 265 of the Laws of Zambia

Provides for the prevention and suppression of diseases and generally regulates all matters connected with public health in Zambia. The Act ensures that the workers are safe and protected at their workplace through the provision of First Aid, washing facilities (sanitation) and providing compensation to the workers in case of any accidents.

d) Occupational Health and Safety (OHS) No.36 of 2010

This section sets out the key aspects of the national labour legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in this Section. The Occupational Health and Safety Act No. 36 of 2010 provides for the following: establishment of the Occupational Health and Safety Institute and its functions; establishment of health and safety committees at workplaces and for the health, safety and welfare of persons at work; the duties of manufacturers, importers and suppliers of articles, devices, items and substances for use at work; the protection of persons, other than persons at work, against risks to health or safety arising from, or in connection with, the activities of persons at work; and related matters. This law is broadly concerned with potential hazards to persons in the workplace.

The Occupational Health and Safety (OHS) articulates duties of employers, employees and other persons in occupational safety and health in Parts III and IV of the Act. In accordance with the OHS Act, it is a duty of the employer to ensure the health, safety and welfare of the employees at the workplace; and place and maintain an employee in an occupational environment adapted to the employee's physical, physiological and psychological ability. The employer must provide the work environment that is safe and without any risk to the health and safety of the employees at their workplace. The employer must also take preventive measures

including adequate first-aid arrangements to deal with emergencies and accidents; provide and maintain adequate supply of drinking water; and separate eating & resting areas free from poisonous or injurious substances.

According to the Occupational Health and Safety Act, the employer is responsible for providing all appropriate protective clothing or equipment to be used in the workplace by employees, who in the course of employment, are likely to be exposed to the risk of bodily injuries, and adequate instructions in the use of such protective clothing or equipment. All the protective equipment is provided free of cost. Employers are obliged to ensure that workers have been provided such information, instructions, training and supervision, especially on a machine or process likely to cause bodily injury, to protect the health and safety of employees at workplace.

The Act also states that a worker must also take reasonable care for his/her own health and safety and that of other persons who may be affected by his/her acts or omissions at the workplace. The Factories Act, CAP441 of the laws of Zambia provides for General health provisions, lifting and machinery provisions, general welfare provisions, health, safety and welfare provisions, and notification and investigation of accidents, dangerous occurrences and industrial diseases.

The Act is relevant and a crucial piece of legislation that regulates health and safety standards in workplaces, including construction sites such as those involved in WASH (Water, Sanitation, and Hygiene) rehabilitation projects.

Compliance: The Act establishes minimum health and safety standards that must be adhered to during construction and rehabilitation activities, ensuring the well-being of workers. It requires employers to assess risks and implement appropriate measures to mitigate hazards related to machinery, working conditions, and materials used in the project.

The Act mandates that workers receive adequate training and information on safety practices, which is essential in environments where WASH facilities are being rehabilitated. It enforces the provision of necessary PPE to workers, reducing the risk of injury or exposure to hazardous materials during rehabilitation activities.

The Act requires reporting of workplace accidents and incidents, which is vital for continuous improvement of safety protocols in WASH rehabilitation. It allows for inspections by regulatory bodies to ensure compliance with safety standards, helping to identify and rectify potential hazards proactively. The Act may include provisions that relate to the management of waste and emissions from construction activities, ensuring that environmental standards are met during the rehabilitation of WASH facilities. The PIU will ensure that the project is undertaken in a manner that complies with applicable international conventions, and national directives**, as well as the provisions of ESS2 and related World Bank standards,** for addressing occupational health and safety issues. The WASH facilities contractor is required to prepare an Occupational Health safety Management Plan to manage OHS risks. This will include conducting a thorough OHS Risk Assessment, identifying all potential hazards associated with WASH infrastructure project activities, developing a risk mitigation plan, establishing clear OHS policies that outline the contractor's commitment to OHS, detailing the responsibilities of management, supervisors, and workers. Training and capacity building should be incorporated in the OHS management plan.

4.0 RESPONSIBLE STAFF

Project Implementation Units have been set up and will be maintained throughout the project implementation, at Gender Division, at Ministries Head offices in the MCDSS under the Department of

Community development and the Directorate of Social Welfare, Ministry of Health and in the Ministry of Education under the Department of Planning and Information. Each of the implementing ministries is responsible and accountable for implementation of their component and activities, with the Permanent Secretary as the controlling officer. Each PIU is responsible for overall coordination and strategic guidance as well as oversight in all functions.

The PIUs will be supported by the Provincial offices responsible for planning, quality control, training, budgeting and budget review; financial and progress reporting as well as oversight on district reporting and sensitization and capacity building activities at provincial level. District offices will oversee the day-to-day implementation, administration, financial management, procurement, monitoring and evaluation of the project, as further detailed in the Project Implementation Manual.

MOH will under the WASH rehabilitation activity address issues as key aspect of procurement for works as well as during contractor induction. The contractor will be responsible for LMP management in accordance with contractor specific LMPs implemented supervised by the MOH PIU on a monthly basis or at short intervals as defined by specific plans. It will be essential to ensure that all labour-related activities are managed in compliance with national labour laws, Bank standards and international standards, and project-specific requirements. These procedures should aim to protect the rights, health, safety, and well-being of workers engaged in the WASH infrastructure rehabilitation activity.

MoH will implement a comprehensive procurement strategy for works associated with the WASH rehabilitation project, ensuring that all contractors are selected based on their capacity to adhere to environmental and social standards. During the contractor induction, MoH will emphasize the importance of compliance with labour management procedures, including health and safety measures, fair labour practices, and community engagement. This induction will involve detailed training sessions that cover the project's policies, expectations, and legal requirements. MoH will:

- Organize training sessions for contractors and workers on labour rights, safety practices, and the importance of compliance. Establish clear reporting channels for workers to voice concerns or report violations anonymously. Ensure that there are no repercussions for those who speak up.
- Regularly review labour-related documentation, including payroll records, contracts, and incident reports, to ensure compliance with labour laws and project policies.
- Set specific performance indicators related to labour management (e.g., incident rates, training completion rates) and review these regularly to assess compliance.
- If non-compliance or issues are identified, implement corrective actions promptly. Document these actions and follow up to ensure effectiveness.

To effectively supervise the implementation of these labour management procedures, the MoH will appoint dedicated oversight personnel who will conduct regular site visits and audits. These personnel will monitor compliance, address any issues promptly, and facilitate communication between contractors and workers.

Institutional arrangements for implementation

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
National level (Head Quarters)	The PS Administration of the Ministry of Education will be the controlling officer for the management of funds and supervision of activities and will provide overall guidance and oversight of the KGS. The component will be implemented by a PIU under the Department of Planning and Information with overall management provided by the Director of Planning. This section focuses on the roles of the various stakeholders, particularly MOE, Gender Division and MCDSS, that will be key in the implementation of KGS. ***Project Implementation Unit:*** The KGS PIU team includes the KGS Coordinator, Assistant Coordinator, two Program Officers, as well as specialists on case management, communication, M&E, GRM/ GBV/E&S, Information, Communication, and	The PS MCDSS is the controlling officer for the management of SWL funds and supervision of activities and will provide overall guidance and oversight of this component. SWL will be implemented by a PIU under MCDSS DCD. The Director Community Development will provide management support of SWL activities. The PIU will function under the guidance of management and will oversee implementation of activities at provincial, district and community levels. The SWL PIU includes the SWL Manager and specialists in charge of targeting, training, savings, communication, GRM/GBV/E&S, payments, FM, procurement, M&E, and ICT. Additional expertise may be on-boarded under GEWEL 2, based on the need. The SWL PIU will be responsible for: • Preparation of the annual work plan and budget • Planning the detailed geographic roll-out	The PS MCDSS is the controlling officer for the management of SCT funds and supervision of activities. The implementation of Foundational SCT will be conducted by the PIU under the MCDSS Department of Social Welfare (DSW). The Director Social Welfare will provide strategic guidance on day-to-day activities of the PIU. The SCT PIU will have the following officers: SCT Coordinator, SCT Project Manager, specialists in the fields of management and implementation, MIS, FM, procurement, M&E, communication, E&S/GRM/GBV. Specialists in additional areas may be on-boarded based on the need. The	The MOH will establish a lean PIU under the Directorate of Public Health at MOH Headquarters. The PIU will comprise a project coordinator, nutrition specialist, and an M&E specialist. All other key operational positions, particularly those related to fiduciary and E&S, will be supported by dedicated qualified officers within the relevant departments in the MoH, with knowledge and familiarity with the implementation of World Bank-funded projects. Existing MOH structures will be utilized at national, provincial, district, and community levels. At national level, the PIU will report to and receive guidance and support from the PS Donor Coordination and PS Administration Roles: • PS Donor Coordination -provide overall guidance and coordination of the component • PS Administration -be the fund management controlling officer • PIU- implement all nutrition-specific activities and coordinate/collaborate with the ST PIU and other

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
	Technology (ICT), and FM. In addition, GEWEL 2 will on-board a dedicated procurement specialist and an expert to support the development of the school to tertiary education or work transition activities, and other experts as deemed necessary. **The KGS PIU will:** • Coordinate and supervise all KGS activities in provinces • Develop operational guidelines on implementation of KGS • Develop work plans and budgets on KGS • Identify KGS beneficiaries • Generate a list of KGS beneficiaries • Orient provincial and district Staff on KGS • Conduct quality assurance • Oversee sensitization meetings with stakeholders • Conduct monitoring and evaluation and generate reports	• Identification of risks, bottlenecks, and challenges • Tracking and oversight of SWL implementation • Drafting of progress monitoring reports • Verifying the list of identified communities to determine adherence to selection criteria • Verifying beneficiary payment schedules prepared by District Community Development Officer (DCDOs) • Collecting and reviewing reports from districts and community levels • Support ICT innovations and use in the implementation of SWL activities	SCT PIU will be responsible for: • managing and ensuring day to day implementation activities, • including providing oversight of activities of the provincial, district and community levels.	cooperating partners on nutrition-sensitive activities.

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
	• Keep records on KGS • Participate in GEWEL coordination meetings			
Provincial level	Each province has a Provincial Education Officer and a Senior Planning Officer who will serve as the focal point person for KGS implementation, complemented by the Senior Education Standards Officer-Guidance and Counselling, Provincial Statistician, Senior Education Officer, Open and Distance Learning Officer, Data Entry Operator, and Provincial Accountant, all responsible for the planning, coordination, implementation, and monitoring of KGS activities. **The Provincial Education Office will:** • Coordinate and supervise all KGS activities in districts • Appoint a Senior Planning Officer as Focal Point Person for the KGS initiative • Collaborate with MCDSS PSWO on KGS matters	The SWL PIU will be supported through existing officers in the provinces, specifically the Provincial Community Development Officer (PCDO), Senior Community Development Officer (SCDO) and a Provincial Accountant. These officers will support coordination, quality control, FM, and other operational areas of project implementation.	MCDSS Provincial Social Welfare Office will oversee the implementation of the Foundational SCT through the leadership of the Provincial Social Welfare Officer (PSWO) and Assistant Social Welfare Officers (ASWOs) in all provinces.	Provincial Health Office (PHO) - Public health specialists and Provincial Nutritionists will support coordination, quality control, and other operational issues related to component implementation ***Roles of the PHO:*** responsible for technical support to the districts as well as facilitating the implementation of nutrition activities at district and community levels. Building on this function, the PHO will support capacity building trainings and conduct supervisory visits.

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
	• Undertake quality assurance in conjunction with headquarters			
District level	***Implementation at district level*** District activities are led by the District Education Board Secretary (DEBS), with support from the District Planning Officer, Assistant Statistical Officer, District Guidance and Counselling Coordinator, and the District Resource Centre Coordinator. **The District Education Board will:** • Coordinate and supervise all KGS activities in schools • Appoint Planning Officer as Focal Point Person for KGS initiative and GRM/Case Management focal point persons • Implement operational guidelines on KGS • Prepare AWPBs at the district level • Conduct school-based verification	***Implementation at district level:*** District activities will be led by the DCDO who manages the accounts at district level and oversees activities of community structures. The DCDO is supported by Assistant Community Development Officers (ACDOs). The DCDO oversees all aspects of the delivery chain. Specifically, DCDOs functions are to: • Facilitate selection and enrolment of SWL beneficiaries • The DCDO is a member of the District Development Coordinating Committee (DDCC) and the District Welfare Assistance Committee (DWAC), to which the DCDO will report on GEWEL 2 activities and coordinates with stakeholders • Check and verify that training attendance is uploaded by the Community Development Assistants (CDAs) on the MIS • Monitor the progress during training and gather feedback	**Implementation at district level:** District activities are implemented by the District Social Welfare Office under the leadership of the District Social Welfare Officer (DSWO), with support from the Assistant Social Welfare Officer (ASWO). The DSWO will be responsible for: • Managing the accounts at the district level, • Overseeing activities of the community structures, • Reporting to the Provincial Social Welfare Officer, • Serving as a member of the District Development Coordinating	District Health Office (DHO)- Public health officers and District Nutritionists will support and oversee the activities of the PHC facilities ***Roles of the DHO:*** • Appropriate communication and referral mechanism will be developed to facilitate service provision for households that qualify for nutrition services. • Provide SBCC materials to the CBVs using various channels of communication

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
	• Collect and enter data of the girls on KGS MIS • Update lists of beneficiaries for future inclusion on KGS • Implement the GRM • Undertake M&E • Conduct sensitization meetings with community structures and beneficiaries on KGS • Hear appeals from communities	from beneficiaries/ participants after the training • Oversee knowledge assessment and process evaluations of the training component • Work with Payment service providers (PSPs) agents to ensure registration and activation of beneficiary's chosen financial product (mobile money or bank account) • Facilitate the uploading of beneficiary and (mobile money or bank account) • Approval of the uploaded beneficiaries and CBVs for payment • Coordination of PSP agents to ensure beneficiaries and CBVs have access to cash out points	Committee (DDCC), and • Secretariat of the District Welfare Assistance Committee (DWAC).	
Community level	***Implementation in schools and community:*** At the school level, the Head Teacher, supervised by the DEBS, will ensure smooth implementation of KGS activities, working in close collaboration with the	***Implementation at community level:*** The main actors at the community level are the CDAs and the CBVs. They directly interface with the project beneficiaries on a day-to-day basis. As a result, they will have a critical role in the implementation of the M&E plan at	**Implementation at Community level:** Community Welfare Assistance Committees (CWACs) are community structures of MCDSS that will provide implementation support	**Primary Health Care (PHC) facilities-** Health facility in-charge working with facility Nutritionist and Environmental staff will manage, coordinate, and supervise all nutrition and Water, Sanitation, and Hygiene (WASH) activities in the PHC facilities and surrounding areas. CBV focal points will

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
	Guidance and Counselling teacher, who is also the KGS focal point person. To ensure effective community engagement, the schools operate through the parent-teacher committees. Outlined below are the core areas in which various stakeholders at the community level support the KGS.	that level. All data and reports prepared by CBVs will be submitted to the CDAs, who then report to the DCDOs in a timely manner. The main M&E activities that CDAs, CBVs, and SWL M&E staff will undertake at the community level include: • Tracking start and end dates of beneficiaries training • Tracking daily attendance of beneficiaries and CBVs during training • Inspecting lesson plans for trainers through training progress monitoring • Gathering beneficiaries' feedback on training activities • Verifying grant amounts received by each beneficiary • Gathering beneficiaries' feedback on the grant payment process • Tracking weekly mentoring meetings attendance and savings club attendance by both CBVs and participants • Gathering feedback of savings group members on the level of	to the SCT on the ground. Key areas of support will be in beneficiary targeting, payments, and monitoring. The chairpersons and secretaries of the CWACs will also sit on the Area Coordinating Committees (ACCs), which are responsible for monitoring and coordinating the CWACs. Oversight of community structures is depicted in the figure below. The CWACs will also support MOH Community Based Volunteers (CBVs) in identifying and/or validating members of SCT households eligible for the nutrition cash top up and nutrition-specific services.	be manage, facilitate, and ensure quality assurance of the CBVs' performance **Community Based Volunteers (CBVs**)- CBVs will be responsible for conducting all demand creation activities with community members and households, with priority given to those SCT households receiving the nutrition cash top-ups ***Roles of the CBVs:*** CBVs will be responsible for: • Delivery of the community-level nutrition services • Conducting referrals and follow-ups to and from the health facilities • Conducting all nutrition education and counselling activities • Maintaining a register of the target population for nutrition specific services outlined in this manual • Facilitating the dissemination of key nutrition related messages, WASH messages and the importance of food diversification

Arrangements	MoE Structure	SWL Structure	SCT Structure	MoH Structure
		satisfaction with the operations of the groups • Monitoring content, including lessons taught and linkages to external speakers, of the weekly mentoring meetings • Monitoring savings clubs progress towards the key milestone • Keeping accurate records of beneficiaries' savings and loans • CDAs will keep records of all community mobilization activities • CDAs compile monthly and quarterly reports to district Officers		

5.0: POLICIES AND PROCEDURES

The contractor shall keep records of set out in the LMP. Employment records shall be kept onsite and reported to the PIU on a monthly basis. Labour reports will be submitted to the respective district labour offices as required under the Labour legislation. Where, with respect to or in consequence of any accident during WASH rehabilitation works, a report should be made by any authority appointed to hold a formal investigation under any written law. According to Employment Code Act, 2019 A person shall not employ a child in an industrial undertaking. The project shall promote equal opportunity in employment and eliminate discrimination in an undertaking, and all person shall not engage or subject another person to perform forced labour.

6.0: AGE OF EMPLOYMENT

This project will abide by the Employment Code Act No. 3 of 2019 (Employment Code), the Public Service Regulation and Human Resources manual which uphold the minimum age of employment as not less than 18 years of age. The process of age verification will be undertaken prior to engagement of labour and documented using the national registration card (NRC) or passport or other acceptable identification as means of indicative age verification. For community workers who may not have such documents, a verification by a recognized local leader will suffice to engage him/her.

All project direct workers will be civil servants and will be recruited through Public Service procedures and regulations and, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.

Community volunteers will be recruited through existing community volunteering structures. DWACs will be responsible for sensitizing and ensuring that CWACs and ACCs do not allow children under the age of 18 to be community volunteers and will request for national registration cards and volunteers' identity documents to confirm their ages.

7.0: TERMS AND CONDITIONS

GENERAL APPLICABLE PROCEDURES

The PIU and contractors will apply the following measure when dealing with workers:

- There will be no discrimination with respect to any aspects of the employment relationship, such as: Recruitment and hiring; compensation (including wages and benefits); working conditions and terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices.
- Harassment, intimidation and/or exploitation will be prevented or addressed appropriately.
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable project workers will be provided with special protection.
- The PIU and contractors will provide job/employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave. Code of Conduct included in this LMP will be applicable for all project workers.
- The PIU will ensure compliance with the Code of Conduct including providing briefings/awareness raising on the Code.
- The PIU and contractors will ensure compliance with occupational health and safety procedures and COVID-19 specific procedures (see below) including that the workers are properly trained in application of the standards that are relevant to the work.
- The PIU and retained contractors will ensure no person under the age of 18 shall be employed. Age verification of all workers will be conducted by the contractors.
- The PIU will recruit contractors and labour locally to the extent that they are available.

- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.
- The PIU will supervise and monitor to ensure compliance with the above requirements.
- All workers will be made aware of the Worker's Grievance Mechanism (see below) to raise work related grievances, including any sensitive and serious grievances on Sexual Exploitation, Abuse and Abuse and Sexual Harassment (SEA/SH).

To achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community, the project will apply the following OHS management measures:

- On procurement for contractors, the PIU will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for OHS measures in their respective bids.
- The contractor will develop and maintain an OHS management system that is consistent with the scope of work, which must include measures and procedures to address all the following topics listed below and in accordance with local legislation and GIIP (as defined by World Bank Group EHSGs). The management system must be consistent with the duration of the contract and this LMP.
- Contractor will conduct workplace hazards identification and adopt all applicable E&S risk mitigation measures in accordance with local legislation requirements and WBG EHSGs.
- Contractor designates a responsible person to oversee OHS related issues at the project site and define OHS roles and responsibilities for task leaders and contract managers.
- Contractor should put in place processes for workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health, without fear of retaliation.
- Contractor provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan. Whenever PPEs are required for the work, it must be provided at no cost for the workers.
- Contractor should assess workers' exposure to hazardous agents (noise, vibration, heat, cold, vapours, chemicals, airborne contaminants etc.) and adopt adequate control measures in accordance with local regulations and WB EHSGs.
- Contractors provides facilities appropriate to the circumstances of the work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs.
- Contractor provides for appropriate training/induction of project workers and maintenance of training records on OHS subjects.
- Contractor documents and reports on occupational incidents, diseases and incidents as per ESMF guidance.
- Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labour unrest and security.
- Contractor provides remedies for adverse impacts such as occupational injuries, deaths, disability and disease in accordance with local regulatory requirements and Good International Industry Practices.

- Contractor shall maintain all such record for activities related to the safety health and environmental management for inspection by PIU or the World Bank.

INSTITUTIONAL ARRANGEMENT FOR IMPLEMENTATION OF THE LMP

The PIU will carry the main responsibility for the implementation and monitoring of the LMP. Responsible parties at the PIU will identify subproject activities, prepare subproject designs and bidding documents, as well as procure contractors. The Project Manager and Infrastructure Specialist will be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. The Social Safeguards Specialist and the Environmental Safeguards Specialist will ensure that labour management procedures are integrated into the specification section of the bidding documents and the procurement contracts. For this project, the following provisions will inform management of all workers:

(a) **Direct workers**: Civil servants will remain governed by the Employment Code Act no. 3 of 2019, Public Service Regulations and Human Resources Manuals. The MCDSS, MoH and MoE as well as the Gender Division shall therefore follow the public service provisions related to labour engagements and management. Work shall be carried out within specific working hours or at an undertaking specified by the employer. Part-time basis means employment under a contract of employment that stipulates fewer working hours per week than those stipulated for full-time by an employer. Permanent contract basis means a contract of employment and work that is not short term, has regular or systematic hours of work, and has an expectation of continuing; or, expires on the employee's attainment of the retirement age specified under the written law. The normal days' work of a full-time employee (a) shall consist of eight hours of actual work; and (b) may begin on any day of the week, including a public holiday, where that employee works on a public holiday. An employer and an employee, other than a part-time employee, may agree that the employee works in excess of the stipulated hours without added remuneration if the number of hours covered in a week does not exceed forty-eight hours or a lesser number of hours that may be specified in a contract of employment or collective agreement.

Where a casual employee, other than a part-time employee, has completed forty-eight hours of work or a lesser number of hours as specified in a contract of employment in less than six days in a week, the employer shall pay the employee six normal days basic wages in respect of that week. An employer shall pay an employee who works in excess of forty-eight hours in a week, one and half times the employee's hourly rate of pay.

(b) **Community Workers**: Minutes of meetings where volunteers were selected including their terms of labour explained and that their labour will be provided on a voluntary basis, will be recorded, and kept through the DSWO. This includes details of what has been agreed, the way in which such agreement was reached, and how the community workers are represented showing that there was consent which must exist throughout the employment relationship and the community worker must have the possibility to revoke freely given consent. DSWOs will assess the authenticity of the free and informed consent, ensuring that no external constraint or indirect coercion was carried out, by any act of the authorities.

(c) **The contracted workers** shall abide by the provisions of the Employment Code Act of 2019, and other relevant standards. Work shall be carried out within specific working hours or at an undertaking specified by the employer. Work shall be carried out within specific working hours or at an undertaking specified by the employer. Part-time basis means employment under a contract of employment that stipulates fewer working hours per week than those stipulated for full-time by an employer. Permanent contract basis means a contract of employment and work that is not short term, has regular or systematic hours of work, and has an expectation of continuing; or, expires on the employee's attainment of the retirement age specified under the written law. The normal days' work of a full-time employee (i) shall consist of eight hours of actual work; and (ii) may begin on any day of the week, including a public holiday, where that employee works on a public holiday. An employer and an employee, other than a part-time employee, may agree that the employee works in excess of the stipulated hours without added remuneration if the number of hours covered in a week does not exceed forty-eight hours or a lesser number of hours that may be specified in a contract of employment

or collective agreement. Where a casual employee, other than a part-time employee, has completed forty-eight hours of work or a lesser number of hours as specified in a contract of employment in less than six days in a week, the employer shall pay the employee six normal days basic wages in respect of that week. An employer shall pay an employee who works in excess of forty-eight hours in a week, one and half times the employee's hourly rate of pay.

(d) **Primary Supply Workers** shall abide by the provisions of the Employment Code Act of 2019, Contract of engagement to supply and other relevant standards. Work shall be carried out within specific working hours or at an undertaking specified by the employer. Work shall be carried out within specific working hours or at an undertaking specified by the employer. There shall be clear specifications of the goods or services to be supplied, including quality standards and compliance with relevant regulations. Detailed timelines for delivery, including deadlines and any penalties for late delivery should be included and pre-agreed. Clearly define pricing, including any discounts, taxes, and payment methods. Terms regarding when payments will be made, including milestones or upon receipt of goods shall be agreed. Obligation to comply with Zambian laws and regulations related to the supply of goods, including health, safety, and environmental standards and all necessary licenses and permits to conduct business shall be included in the contract. Rights for the buyer to inspect and test goods before acceptance to ensure they meet agreed-upon specifications, and provision of warranties for the goods supplied, including remedies for defects or non-conformities should be discussed and agreed. There shall be an outline of responsibilities and liabilities for damages, losses, or injuries resulting from the supplied goods.

For the supplier's workers, the following shall apply and be monitored by the project: Part-time basis means employment under a contract of engagement that stipulates fewer working hours per week than those stipulated for full-time by an employer. Permanent contract basis means a contract of employment and work that is not short term, has regular or systematic hours of work, and has an expectation of continuing; or, expires on the employee's attainment of the retirement age specified under the written law. The normal days' work of a full-time employee (a) shall consist of eight hours of actual work; and (b) may begin on any day of the week, including a public holiday, where that employee works on a public holiday. An employer and an employee, other than a part-time employee, may agree that the employee works in excess of the stipulated hours without added remuneration if the number of hours covered in a week does not exceed forty-eight hours or a lesser number of hours that may be specified in a contract of employment or collective agreement. Where a casual employee, other than a part-time employee, has completed forty-eight hours of work or a lesser number of hours as specified in a contract of employment in less than six days in a week, the employer shall pay the employee six normal days basic wages in respect of that week. An employer shall pay an employee who works in excess of forty-eight hours in a week, one and half times the employee's hourly rate of pay.

8.0 GRIEVANCE MECHANISM

There will be a specific Workers Grievance Redress Mechanism (Worker GRM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns will be specified, including time commitments to resolve issues. Workers will be informed about the relevant Worker GRM upon their recruitment and their right to redress, confidentiality and protection against any reprisals from the employer will be stated in the contract.

Routine Grievances

The process for the Worker GM is as follows:

- Any worker may report their grievance in person, by phone, text message, mail, or email (including anonymously if required) to the contractor as the initial focal point for information and raising grievances. Each grievance record should be allocated a unique number reflecting sequence and

district of received complaint. Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy. For complaints that are satisfactorily resolved by the aggrieved worker or contractor within one week of receipt of complaint, the incident and resultant resolution will be logged and reported monthly to the social safeguards' specialist at the PIU.

- If the grievance is not resolved within one week, the contractor (or the complainant directly) will refer the issue to the PIU Grievance Redress Committee (PIU GRC) through the social safeguards' specialist. The PIU GRC will work to address and resolve the complaint and inform the worker as promptly as possible, if the complaint is related to something urgent that may cause harm or exposure to the person, such as lack of PPE needed to prevent COVID-19 transmission. For non-urgent complaints, the PIU GRC will aim to resolve complaints within 2 weeks. For complaints that are satisfactorily resolved by the PIU GRC, the incident and resultant resolution will be logged by the social safeguards' specialist as part of regular reporting. Where the complaint has not been resolved, the PIU GRC will refer the case to the Ministerial GRC for further action or resolution.

The workers will preserve all rights to refer matters to relevant judicial proceedings as provided under national labour law.

Serious Grievances

In case a worker experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, the worker may raise the case, verbally or in writing directly to the contractor or PIU GRC. The contractor will immediately refer the case to the PIU. The PIU will immediately investigate the case respecting confidentiality and anonymity of the worker.

Upon project effectiveness, the PIU will designate a Focal Person or Persons for Serious Grievances. These Focal Persons will receive training in investigating serious grievances, relevant laws and regulations, and World Bank standards including the rights of people who file a grievance. The PIU and the World Bank will jointly develop culturally sensitive and locally appropriate roles and responsibilities, and procedures.

In case a direct worker or civil servant has a serious grievance, the staff may directly contact verbally or in writing the Focal Person for Serious Grievances.

All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

9.0 CONTRACTOR MANAGEMENT

Contractors in this project will be engaged under MoH. The contractors will be managed in line with the ESF and national requirements. The PIU will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have put in place labour management procedures applicable to the project that will allow them to operate in accordance with the requirements of the ESS. All the contractor's staff will be availed the GRM, SEP, ESMP and will sign the Code of Conduct.

The PIU will apply the following contractor management procedures to administer oversight and action against contractors for non-compliance with the LMP.

- The PIU will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- The PIU will include the provisions of the ESMF, LMP and other relevant documents into the specification section of the bidding documents. The contractors will be required to comply with these specifications.
- Contractor will raise worker awareness on the Code and Conduct.
- Contractor will show evidence of OHS and Emergency Preparedness procedures.

- The PIU will monitor contract's E&S performance during its regular site visits utilizing contactor reporting or external monitoring/supervision consultants where available. Where appropriate, the PIU may withhold contractor's payment or apply other contractual remedies as appropriate until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify the PIU of incidents and accidents.

WORKER ACCOMMODATION

If accommodations are provided for workers, contractors will ensure that they are provided in good hygiene standards, with fresh drinking water, clean beds, restrooms and showers, clean bedrooms, good illumination, lockers, proper ventilation, safe electrical installation, fire and lightening protection, separate cooking and eating areas. There will be separate facilities provided for men and women. The contractors will be liable to comply with "Workers' Accommodation: Processes and Standards: A guidance Note" by IFC and the EBRD and the Contractor Environmental and Social Management Plan (C-ESMP).

10.0 COMMUNITY WORKERS

Community volunteers including Community Welfare Assistant Committees (CWACs) and Area Coordinating Committees (ACCs) will be involved mainly in community mobilization and sensitization about the project as described in the table below. The PIU through District Social Welfare Officers (DSWO) will ensure that no one under the age will be allowed to work as a community volunteer on the project through checking all project volunteer's national registration documents. DSWOs will agree on the terms of engagement with community volunteers and will prepare and share minutes with the community and community volunteers.

Section 5.0 of this LMP shows the community volunteers roles and responsibilities under the project.

District offices will be responsible for monitoring the community workers as further detailed in the Project Implementation Manual.

11.0 PRIMARY SUPPLY WORKERS

This includes the suppliers' workers and the project's supply workers involved in the supply requests and supply chain. The primary supply workers on the project may include the following: Logistics coordinators that manage the transportation and distribution of supplies to various project locations. Warehouse managers that oversee storage facilities where supplies are kept before distribution. Procurement officers that source and purchase necessary materials and supplies from vendors, preparing contracts with suppliers, procurement agreements, and compliance documentation. Inventory clerks that track the quantities of supplies available and manage reordering processes. Quality assurance inspectors that ensure that supplied materials meet quality and safety standards. Field distribution workers distribute supplies directly to beneficiaries or project sites. These may be sanitary towels, hygiene kits, construction materials, and water and sanitation supply etc.

ANNEX 1: CODE OF CONDUCT

This Code of Conduct that will be used in the Project. If an international bidding process is being used with World Bank Standard Procurement Documents, a Code of Conduct is already included there and should be used as is. If a national bidding process is being used to procure contractors, a basic Code of Conduct should be included in the LMP and the bidding documents. This Code of Conduct is to be signed by all contractor staff, including managers, working on the project.

I agree that while working on the project I will:

- Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, language, religion, political or other opinion, national, social origin, citizenship status, property, disability, birth or other status.
- Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual activity with community members.
- Not engage in sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the Worker GRM suspected or actual gender-based violence against a person of any gender by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass women, children or a vulnerable person through these mediums.
- Comply with all relevant local legislation.
- Engaging in any of the prohibited activities above can be cause for termination of employment, criminal liability, and/or other sanctions.

Sanctions

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

(a) Informal warning;
(b) Formal warning;
(c) Additional Training;
(d) Loss of up to one week's salary;
(e) Suspension of employment (without payment of salary), for a minimum period of 1 month
(f) up to a maximum of 6 months;
(g) Termination of employment;
(h) Report to the Police if warranted.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex 5: WASTE MANAGEMENT PLAN

The Waste Management Plan (WMP) has been prepared to manage hazardous and non-hazardous wastes on GEWEL 2 project, consistent with ESS3.

1.0. Scope

The scope of this waste management plan (WMP) applies to all project beneficiaries that will be supported by the GEWEL 2 on how to manage non-hazardous and hazardous waste streams. This WMP has been mandated by the national waste management legislation, the project Environmental and Social Commitment Plan (ESCP) and the World Bank ESS3: Resource Efficiency and Pollution Prevention and Management to identify and mitigate potential environmental and social risks and impacts related to management of hazardous and non-hazardous. The WMP addresses the management of all waste streams related to agricultural activities – chemicals, solid, and liquid waste, including hazardous and non-hazardous waste likely to be generated under GEWEL 2 project activities. This plan covers the preparation, construction, and implementation phases of subproject activities.

2.0 Purpose

The waste management plan aims to provide guidelines on waste reduction, segregation, collection, and disposal practices in accordance with Zambian laws, World Bank environmental and social standards and the EHSGs on practices, to avoid pollution and contamination of the natural environment and negative impacts on the occupational, community health and safety in and around project areas. The GEWEL 2 project is committed to applying the waste hierarchy and will seek to be a zero-waste disposal undertaking. This plan is the primary a tool to guide all undertakings towards waste management.

3.0 Waste Management Considerations under the GEWEL 2

The generation of waste is one of those risks and impacts that must be considered during preparation, construction, operations, and the decommissioning phases of the project. Waste management under the GEWEL 2 shall be conducted as early as possible to identify avoid, minimize and mitigate the risks and impacts related to hazardous and non-hazardous waste streams.

Objective

The objectives of this plan assessment are: (i) to assess the activities involved for the proposed project and determine the type, nature, and potential sources of waste to be generated; (ii) to identify any potential environmental impacts from the generation of waste at the project sites; (iii) to recommend appropriate waste handling and disposal measures in accordance with the World Bank environmental and social standards and the national environmental requirements.

5.0 Legal Framework

The waste management plan shall be guided by the following national legislation and World Bank safeguards requirements

- Environmental Management Act No.12 of 2011);
- Environmental Management (Licencing) Regulations (SI.No.112 of 2013);
- World Bank Environmental and Social Standards (ESSs);

- Environmental Health and Safety and Guidelines

5.0 The Waste Management Hierarchy

Under GEWEL 2, different types of waste streams will be generated during the implementation of the various components. This includes hazardous and non-hazardous waste. The waste hierarchy presents waste management stages commencing with the most preferable option to the least preferable option. Waste prevention is the most preferred option, followed by reuse, recycling, recovery including energy recovery and as the last option is safe disposal, see Figure below.

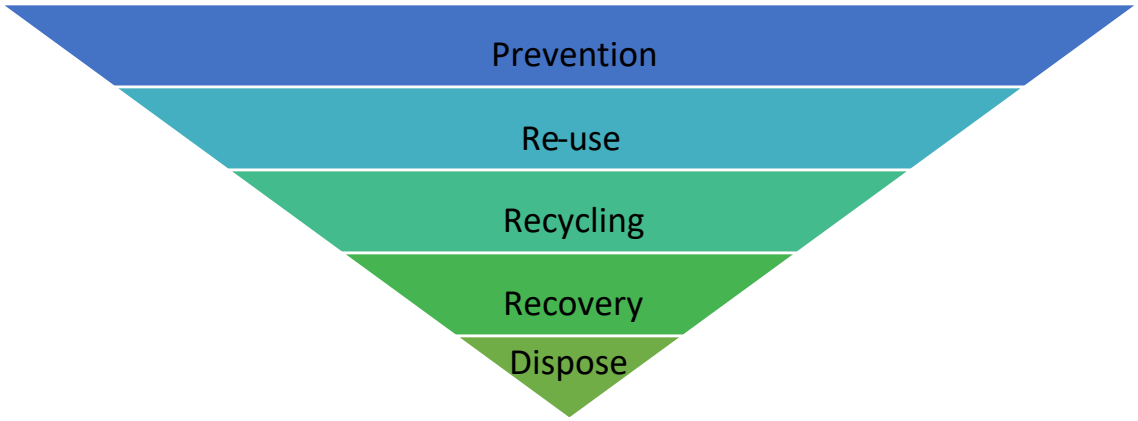


Figure 0-1: Stages of the Waste Management Hierarchy

These stages are described in more detail below:

Prevention

The components should be required to strictly minimise wastage. This will be a commitment to avoid the generation of waste and not using large quantities of hazardous materials. E-waste will be minimised by ensuring maintenance of the digital gadgets. Where the use of hazardous materials is unavoidable, efforts should be made to identify replacement materials that are non-hazardous through continued research and development.

Re-use

All the packaging will be re-used to an extent possible, and food waste, including crop harvest residues will be re-used in the cultivation process and soil conditioning. All biodegradable waste to be composed for agricultural use. Sanitary towels will be re-used by the component 2 project to prevent disposal.

Recycling

The project components will seek to turn waste into a new product of economic value, such as composting of organic wastes to a standard that meets needed quality. This compost could be used in farming to facilitate improvements in soil conditions and hence improve farmland production levels.

Recovery

Recovery of waste is usually most successful when done in bulk. Therefore, a centralised recovery facility is preferable. Forms of recovery include composting, or anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) from waste. It is recommended that the solid waste management system be modified and improved to make it compatible with the requirements of the proposed bio-methanation technology. In this regard, a biodigester may be

used as a combined heat and power system using domestic waste streams, or a composting facility for managing garden waste.

Disposal

Disposal is deemed the last resort and must occur in an environmentally responsible manner. Disposal results in waste going to landfill or to incineration without energy recovery and is the least preferred environmental option.

Anticipated Waste Streams Generation under GEWEL 2

GEWEL 2 is anticipated to generate both hazardous and non-hazardous waste.

Non-hazardous waste will include food waste, agricultural waste, paper, cardboards, glass, metal waste etc. Direct cash transfers can lead to increased consumption, which may result in higher waste generation and environmental degradation. Beneficiaries might spend cash on consumer goods that contribute to waste, like plastic products, or on services that have environmental impacts. Higher enrolment of the girls can lead to increased waste generation, including paper, plastic, and food waste. Increased production activities can lead to higher waste generation, including organic waste, packaging materials, and industrial by-products which are not safely disposed of. Demolition waste such as concrete, steel, plastic, wood is expected from the WASH rehabilitation works.

Hazardous waste: Strengthening social protection institutions and systems to improve delivery of services which may include digitalization of existing systems and e-waste. Pesticides, chemicals and fertilisers will be used in agriculture production activities, resulting in contaminated empty packages and unused residue. Reusable sanitary towels will reduce the volume of menstrual waste compared to disposable options. However, the project must promote the use of high-quality, durable materials to ensure the longevity of reusable towels, thereby minimizing the frequency of replacements and further reducing waste. Reusable sanitary towels can be more cost-effective, reducing the financial burden on families and the girls for menstrual hygiene products. Providing reusable sanitary towels enhances menstrual hygiene management for girls and women, particularly in low-income and rural areas where access to disposable products is limited. Access to reliable menstrual hygiene products can significantly reduce absenteeism among schoolgirls, leading to better educational outcomes. On the other hand, Reusable sanitary towels require regular washing, which requires reliable water supply, introducing reusable sanitary towels can challenge existing cultural norms surrounding menstruation, and improper use or inadequate cleaning of reusable sanitary towels can lead to health risks such as infections, generation of biohazard waste and blood contaminated water.

It is worth noting that electronic waste will be managed using the e-waste management plan in Annex 6 while other hazardous waste streams and the non-hazardous will be managed using this waste management plan (Annex 5).

6.0 Environmental and Social Risk and Impacts of Waste

The potential environmental and social risk related to management of hazardous waste streams are summarised as follows:

- Procurement of expired pesticides or those nearly shelf-life causing an increase in hazardous waste;

- Procurement of banned or restricted chemicals with unknown formulation causing health and environmental risks;
- Spillages during loading, offloading and transportation that may cause soil, ground and surface water contamination;
- Improper storage of hazardous waste causing air, soil and water contamination;
- Improper handling leading to community and occupational health and safety risks such as skin burns, allergies;
- Odor and nuisances to nearby communities;
- Bioaccumulation causing ecosystem degradation.

6.2 Environmental and Social Risk and Impacts of Non-Hazardous Waste

- Over procurement of materials leading to onsite handing, generation of reworking and offcuts on site;
- Generation of smells and odours during storage;
- Contamination of ground and surface water sources during storage;
- Improper storage of non-hazardous waste causing air, soil and water contamination;
- Occupational health and safety risks
- Long term pilling of concrete waste may cause soil and air pollution during storage;
- Spillage and dropping of waste whilst in transit to the dump site causing odour nuisance.
- Smells and doors to road users whilst in transit;
- Community health and safety risk to other road users;
- Occupational health and safety to operators during transit;
- Inappropriate transportation of non-hazardous waste leading to community health and safety risk;
- Illegal disposal of waste and leachate causing ground and surface water contamination;
- Scavenging causing community health and safety

7.0 Proposed Mitigation Measures

This waste management plan contains proposed mitigation measures through which waste that will be generated during the implementation of GEWEL 2 may be managed in compliance with the Environmental Management Act No.12 of 2011 that is read together with the Environmental Management (Licensing) Regulation, Statutory Instrument No.112 of 2013.

The proposed mitigation measures have also adopted the World Bank Environmental and Social Standards (ESS), particularly ESS3: Resource Efficiency and Pollution Prevention and Management, World Bank Environmental and Health Safety Guidelines (WB ESHG) and Good International Industry Practice.

The mitigation measures are aimed at avoiding, minimizing, and reducing potential environmental and social impacts related to the generation and disposal of waste during the implementation of the GEWEL 2. Tables below present a description of some of the mitigation measures that have been proposed under the GEWEL 2.

7.0 Monitoring and Reporting

7.1 Performance Monitoring

The goal of monitoring is to measure the success rate of the project and determine whether interventions proposed to manage risks and impacts related to management of waste have been successful, or whether further interventions are needed, or monitoring is to be extended in some areas.

7.2 Inspections

Site inspection must be conducted by the PIU and where possible by the public health officers from the local authorities. The subprojects will be monitored on regularly by the TSP Environmental and Social Safeguards Specialists with a formally documented inspection monthly. Inspections will ensure that all aspects of this WMP are being enforced and that specific waste management elements are verified.

7.3 Waste Audit

A waste audit shall be conducted after a year of operation on all waste data collected, to identify waste streams, quantities, fate and develop ways to reduce waste generation.

7.4 Roles of Implementing Agency

The MoH, MCDSS and MoE implementing this project will be responsible for overall monitoring and evaluation of this waste management plan. The results of the monitoring reports will be submitted to the World Bank. Due to the spatial extent of the GEWEL 2, the project will conduct regular monitoring and spot checks using environmental and social specialists under the PIU overseen by the Gender Division.

7.5 World Bank's Monitoring Support

The World Bank will provide second line of monitoring compliance and commitments made in the ESCP through implementation support mission and spot check monitoring as and when need arises. In addition, the PIU will submit monitoring reports to the Bank as part of its reporting on a monthly, quarterly, biannual and annual basis. The World Bank support and supervision missions will review these reports and provide feedback.

1.0 Monitoring Roles and Responsibilities

8.1 Project Implementation Unit

The GEWEL 2 that falls under a PIU comprising of E&S Specialists from the MoH, MoE, MCDSS and Gender Division who will be responsible for project administration and coordination. This will include support to implement environmental and social management activities, which include waste management plan.

8.3 Zambia Environmental Management Agency

The Zambia Environmental Management Agency (ZEMA) is a statutory body that was formed under the Environmental Management Act, No 12 of 2011. Some of the functions of ZEMA include integrating environmental management, protecting and conservation of natural resources.

Table below provides the key activities, risks, impacts and mitigation measures for hazardous waste that may be generated under GEWEL 2. Electronic waste is covered under the e-waste management plan (Annex 6).

Table 0-1: Non-Hazardous Waste Management and Monitoring Plan

Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
Increased consumption and higher enrolment causing higher waste generation **The process of rehabilitating WASH facilities can generate construction waste** **Procurement of raw materials and household products** **Improper storage of waste**	• Provide training and encourage sustainable consumption practices among beneficiaries • Promote more sustainable practices in agriculture techniques. • Avoid the generation of non-hazardous waste. • Use recyclable raw materials • Where waste generation cannot be avoided, minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. • Practice waste segregation. • Implement waste management practices such as recycling, composting, and waste reduction strategies. • Dispose of the waste at a designated council disposal site. • Ensure PPE is used for waste handling and disposal. • Ensure proper storage of temporary waste to prevent pollution and OHS incidents	• Training logs • Health checks conducted • Proper waste management • Engagement of waste management contractors	PIU Beneficiaries	100,000

Table 0-2: Hazardous Waste Management and Monitoring Plan

Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
Generation of hydrocarbon waste during construction activities. **The process of rehabilitating WASH facilities can generate sewerage waste and infected clinical waste from**	• If the generated waste is considered hazardous the PIU will comply with existing requirements for management (including storage, transportation and disposal) of hazardous wastes including national legislation and applicable international conventions, including those relating to transboundary movement. Where such requirements are absent, the PIU will adopt GIIP alternatives for its	• Waste disposal records	PIU Beneficiaries	150,000

Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
decommissioned sanitation facilities.	environmentally sound and safe management and disposal. • Avoid the generation of hazardous waste. • Asbestos will not be decommissioned at any point on the project. • Where waste generation cannot be avoided, minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. • Practice waste segregation. • Where waste cannot be reused, recycled or recovered, treat, destroy, or dispose of it in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. • When hazardous waste management is conducted by third parties, the project will use contractors that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies and, with respect to transportation and disposal, obtain chain of custody documentation to the final destination. • The project will ascertain whether licensed disposal sites are being operated to acceptable standards and where they are, the project will use these sites. Where licensed sites are not being operated to acceptable standards, the project will minimize waste sent to such sites and consider alternative disposal options, including the possibility of developing its own recovery or disposal facilities at the project site or elsewhere.			

Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
Increase the use of chemicals and pollutants, affecting local ecosystems. Pesticides can affect non-target species, including beneficial insects, wildlife, and plants. Poses health risks to people.	• Provide training on the use integrated pest management (IPM) techniques to minimize chemical use consistent with ESS 3, ESHGs and GIIP • Use targeted selective pesticides and promote biodiversity. • Provide training to women on safe fertilizer and pesticide handling, use appropriate PPE, and safe application procedures. • The project will minimise use of chemicals and hazardous materials subject to international bans, restrictions or phaseouts unless for an acceptable purpose as defined by the conventions or protocols or if an exemption has been obtained by the project, consistent with national government commitments under the applicable international agreements. • The project will minimize and control the release and use of hazardous materials. The transportation, handling, storage, and use of hazardous materials for project activities will be assessed through the environmental and social assessment. • The project will consider less hazardous substitutes where hazardous materials are intended to be used in the project implementation. • Set up collection points for used chemical containers and work with waste management companies specializing in hazardous waste or the manufacturers of the chemicals. Provide training on safe handling and disposal procedures. Team up with other industries or businesses that can use by-products. • Emergency preparedness and response plan will be in place in each district and complaints/	• Sensitization on IPM • Pesticide selection	PIU Beneficiaries	50,000

Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
	incidents procedures should be developed.			
Higher enrolment may lead to the use of more reusable sanitary towels. But some girls may still purchase more non reusable towels due to empowerment. Reusable sanitary towels require regular washing, which requires reliable water supply, inadequate cleaning of reusable sanitary towels can lead to health risks, there can be generation of biohazard waste and blood contaminated water.	• Educate the pupils on efficient washing practices to minimize water use. Ensure that users have access to sufficient clean water for washing reusable sanitary towels. • Establish or upgrade sanitation facilities in schools and communities to include private, safe, and hygienic spaces for washing and drying reusable sanitary towels. • Ensure comprehensive education on the proper use, cleaning, and maintenance of reusable sanitary towels to maximize their benefits. • Conduct community engagement and education campaigns to address myths and stigmas about menstruation. • Provide access to clean water and safe washing facilities. • Partner with manufacturers committed to sustainable practices, and quality products. • Promote waste management systems in schools, implement a biohazard waste management system to handle used water and any disposable materials associated with reusable sanitary towels. • Educate pupils on safe disposal practices and set up designated collection points for biohazard waste and used cleaning water. Ensure these are managed by trained personnel who can handle waste safely and hygienically. • Collaborate with local authorities and MoH to ensure that wastewater treatment facilities can handle blood-contaminated water. Promote the use of bio-digesters or similar technologies for on-site treatment in rural areas; a designated well-constructed soak	• Training logs • Available WASH facilities for sanitary towel use • Biohazard waste management system • Waste collection points • Hazardous waste service providers	Gender Div. MOE Beneficiaries	150,000

Impact	Enhancement & Mitigation measure	Performance Indicator	Responsibility	Estimated cost (USD)
	pits where the blood water can be treated/ disinfected water before disposal.			
Institutions and systems under improved delivery of services, digitalization may generate e-waste.	• Waste segregation and collection by the local council. • Burying and burning through indiscriminate disposal of waste will not be encouraged unless it's for composting. • Implement waste management practices. • Provide training on safe handling and disposal procedures. • Provide training on the responsible use and maintenance of digital devices to minimize damage and extend their usable life. • Establish e-waste collection points in communities to ensure that faulty electronic devices are properly recycled.	• Training logs • Available WASH facilities for sanitary towel use • Waste collection points • Hazardous waste service providers • Waste collection for disposal and conversion, reuse and recycling	Gender Div. MCDSS Beneficiaries	150,000

Annex 6: ELECTRONIC WASTE MANAGEMENT PLAN (E-WMP)

1.0 Scope

This Electronic Waste Management Plan (EWMP) has been mandated by World Bank (WB) ESS3: Resource Efficiency and Pollution Prevention and Management to identify and mitigate potential environmental and social risks and impacts related to management of electronic waste during the implementation of the GEWEL 2. The EWMP is a living document that shall be reviewed and updated throughout the implementation of the project. The EWMP applies to all project beneficiaries that will be supported by the GEWEL 2. Site specific ESMP will be updated using information contained in this EWMP.

2.0 Consideration on Electronic Waste Management

The GEWEL 2 will manage environmental and social risks and impacts of the project throughout the project life cycle in a systematic manner, proportionate to the nature and scale of the project and to the potential risks and impacts. The generation of all forms of electronic waste is one of those risks and impacts that must be considered during preplanning, construction, operations, and the decommissioning phases of the project.

Electronic waste management planning for the GEWEL 2 shall be conducted early as possible to identify avoid, minimize and mitigate the risks and impacts related to electronic waste. The EWMP aims at developing sound management practices and procedures within the GEWEL 2 project areas. Electronic waste includes hazardous, solid and electronic waste. The focus of this plan is on electronic waste or E-waste. This e-waste management plan should be implemented throughout the project's lifecycle to protect the environment, safeguard the health of the local communities, and comply with The World Bank Environment, Health and Safety Guidelines (EHSG) and Good International Industry Practice (GIIP).

3.0 E-Waste Definitions

Electronic waste (E-waste) is a term used to cover items of all types of electrical and electronic equipment (EEE) and its parts that have been discarded, irreparable or at the end of life. Although E-waste is a general term, it is considered to cover laptops, desktops, tablets, TV's, mobile phones, and household appliances. E-waste contains materials that, if mishandled, can be hazardous to human health and the environment, but, most importantly, also materials that are valuable and scarce.

3.1 Toxicity and Radioactive Nature of E-waste to the Human, Water, Soil, and Animals

Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully. While some naturally occurring substances are harmless in nature, their use in the manufacture of electronic equipment often results in compounds, which are hazardous (e.g., chromium becomes chromium VI). Lead, mercury, cadmium, and polybrominated flame retardants are found in electronic equipment and are all persistent, bio-accumulative toxins (PBTs). They can create environmental and health risks when computers are manufactured, incinerated, landfilled, or melted during recycling. PBTs, are a dangerous class of chemicals that have longevity in the environment and bioaccumulate in living tissues. PBTs are harmful to human health and the environment and have been associated with cancer, nerve damage and reproductive disorders. Table 1 is a selection of the mostly found toxic substances in E-waste.

Table 0-1. Toxic Substances in E-waste

Substance	Occurrence in E-waste
Halogenated compounds	
PCB (polychlorinated biphenyls)	Condensers, Transformers
TBBA (tetrabromo-bisphenol-A) PBB (polybrominated biphenyls) PBDE (polybrominated diphenyl ethers)	Fire retardants for plastics (thermoplastic components, cable insulation) TBBA is presently the most widely used flame retardant in printed
Chlorofluorocarbon (CFC)	Cooling unit, Insulation foam
PVC (polyvinyl chloride)	Cable insulation
Heavy metals and other metals:	
Arsenic	Small quantities in the form of gallium arsenide within light emitting diodes
Barium	Getters in CRT
Beryllium	Power supply boxes which contain silicon-controlled rectifiers and x-ray lenses
Cadmium	Rechargeable NiCd-batteries, fluorescent layer (CRT screens), printer inks and toners, photocopying-machines (printer drums)
Chromium VI	Data tapes, floppy-disks
Lead	CRT screens, batteries, printed wiring boards
Lithium	Li-batteries
Mercury	Fluorescent lamps that provide backlighting in LCDs, in some alkaline batteries and mercury wetted switches
Nickel	Rechargeable NiCd-batteries or NiMH-batteries, electron gun in CRT
Rare Earth elements (Yttrium, Europium)	Fluorescent layer (CRT-screen)
Selenium	Older photocopying-machines (photo drums)
Zinc sulphide	Interior of CRT screens, mixed with rare earth metals

Arsenic

Arsenic is a poisonous metallic element, which is present in dust and soluble substances. Chronic exposure to arsenic can lead to various diseases of the skin and decrease nerve conduction velocity. Chronic exposure to arsenic can also cause lung cancer and can often be fatal.

Barium

Barium is a metallic element that is used in sparkplugs, fluorescent lamps, and "getters" in vacuum tubes. Being highly unstable in the pure form, it forms poisonous oxides when in contact with air. Short-term exposure to barium could lead to brain swelling, muscle weakness, damage to the heart, liver, and spleen. Animal studies reveal increased blood pressure and changes in the heart from ingesting barium over a long period of time. The long-term effects of chronic barium exposure to human beings are still not known due to lack of data on the effects.

Beryllium

Beryllium has recently been classified as a human carcinogen because exposure to it can cause lung cancer. The primary health concern is inhalation of beryllium dust, fume, or mist. Workers who are constantly exposed to beryllium, even in small amounts, and who become sensitized to it can develop what is known

as Chronic Beryllium Disease (beryllicosis), a disease that primarily affects the lungs. Exposure to beryllium also causes a form of skin disease that is characterized by poor wound healing and wart-like bumps. Studies have shown that people can still develop beryllium diseases even many years following the last exposure.

Brominated flame retardants (BFRs)

The three (03) main types of BFRS used in electronic and electrical appliances are Polybrominated biphenyl (PBB), Polybrominated diphenyl ether (PBDE) and Tetrabromo-bisphenol - A (TBBPA). Flame-retardants make materials, especially plastics and textiles, more flame resistant. They have been found in indoor dust and air through migration and evaporation from plastics. Combustion of halogenated case material and printed wiring boards at lower temperatures releases toxic emissions including dioxins, which can lead to severe hormonal disorders. Major electronics manufacturers have begun to phase out brominated flame-retardants because of their toxicity.

Cadmium

Cadmium components may have serious impacts on the kidneys. Cadmium is adsorbed through respiration but is also taken up with food. Due to the long half-life in the body, cadmium can easily be accumulated in amounts that cause symptoms of poisoning. Cadmium shows a danger of cumulative effects in the environment due to its acute and chronic toxicity. Acute exposure to cadmium fumes causes flu-like symptoms of weakness, fever, headache, chills, and sweating and muscular pain. The primary health risks of long-term exposure are lung cancer and kidney damage. Cadmium also is believed to cause pulmonary emphysema and bone disease (osteomalacia and osteoporosis).

Chlorofluorocarbons (CFCs

Chlorofluorocarbons are compounds composed of carbon, fluorine, chlorine, and sometimes hydrogen. Used mainly in cooling units and insulation foam, they have been phased out because when released into the atmosphere, they accumulate in the stratosphere and have a deleterious effect on the ozone layer. This results in increased incidence of skin cancer in humans and in genetic damage in many organisms.

Chromium

Chromium and its oxides are widely used because of their high conductivity and anti-corrosive properties. While some forms of chromium are nontoxic, Chromium (VI) is easily absorbed in the human body and can produce various toxic effects within cells. Most chromium (VI) compounds are irritating to eyes, skin, and mucous membranes. Chronic exposure to chromium (VI) compounds can cause permanent eye injury, unless properly treated. Chromium VI may also cause DNA damage.

Dioxins

Dioxins and furans are a family of chemicals comprising 75 different types of dioxin compounds and 135 related compounds known as furans. Dioxins is taken to mean the family of compounds comprising polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs). Dioxins have never been intentionally manufactured but form as unwanted by-products in the manufacture of substances like some pesticides as well as during combustion. Dioxins are known to be highly toxic to animals and humans because they bio-accumulate in the body and can lead to malformations of the foetus, decreased reproduction and growth rates and cause impairment of the immune system among other things. The best-known and most toxic dioxin is 2, 3,7,8-tetrachlorodibenzo-p-dioxin (TCDD).

Lead

Lead is the fifth most widely used metal after iron, aluminium, copper, and zinc. It is commonly used in the electrical and electronics industry in solder, lead-acid batteries, electronic components, cable sheathing, in the glass of CRTs, etc. Short-term exposure to high levels of lead can cause vomiting, diarrhoea,

convulsions, coma or even death. Other symptoms are appetite loss, abdominal pain, constipation, fatigue, sleeplessness, irritability, and headache. Continued excessive exposure, as in an industrial setting, can affect the kidneys. It is particularly dangerous for young children because it can damage nervous connections and cause blood and brain disorders.

Mercury

Mercury is one of the most toxic yet widely used metals in the production of electrical and electronic applications. It is a toxic heavy metal that bio-accumulates causing brain and liver damage if ingested or inhaled. In electronics and electrical appliances, mercury is highly concentrated in batteries, some switches and thermostats, and fluorescent lamps.

Polychlorinated biphenyls (PCBs)

Polychlorinated biphenyls (PCBs) are a class of organic compounds use in a variety of applications, including dielectric fluids for capacitors and transformers, heat transfer fluids and as additives in adhesives and plastics. PCBs have been shown to cause cancer in animals. PCBs have also been shown to cause several serious non-cancer health effects in animals, including effects on the immune system, reproductive system, nervous system, endocrine system, and other health effects. PCBs are persistent contaminants in the environment. Due to the high lipid solubility and slow metabolism rate of these chemicals, PCBs accumulate in the fat-rich tissues of almost all organisms (bioaccumulation).

Polyvinyl chloride (PVC)

Polyvinyl chloride (PVC) is the most widely used plastic, used in everyday electronics and appliances, household items, pipes, upholstery, etc., PVC is hazardous because contains up to 56 percent chlorine which when burned produces large quantities of hydrogen chloride gas, which combines with water to form hydrochloric acid and is dangerous because when inhaled, leads to respiratory problems.

Selenium

Exposure to high concentrations of selenium compounds cause selenosis. The major signs of selenosis are hair loss; nail brittleness, and neurological abnormalities (such as numbness and other odd sensations in the extremities).

4.0 Electronic Waste Management Plan

4.1 E-Waste Management under GEWEL 2

This Electrical Waste Management Plan (E-Waste MP) will be implemented throughout the GEWEL 2 lifecycle. The scope of this EWMP also applies to the use of electronic devices used for the project. The plan is required to be adopted during project implementation period when the project finances electrical/electronic equipment (computers, tablets, mobile phones, laptops, etc.) are replaced, irreparable or at their end of life. This plan shall comply with the existing Zambian legislation and regulations, World Bank Environmental Health and Safety Guidelines (WB EHSG) and Good International Industrial Practice (GIIP).

4.2 Aim of Electronic Waste Management Plan

The aim is this E-Waste management plan, to provide guidelines and procedures to beneficiaries under the GEWEL 2 on how to manage risk related to management of electronic waste.

4.3 Objective

The overall objectives of the waste management assessment are summarized below: (i) to assess the activities involved for the proposed project and determine the type, nature, and estimated volumes of

waste to be generated; (ii) to identify any potential environmental impacts from the generation of waste at the project sites; (iii) to recommend appropriate waste handling and disposal measures in accordance with the current legislative requirements, WB ESHG and GIIP.

4.4 Legal Framework

4.4.1 Zambian Environmental Law

The Environmental Management (Licensing) Regulations (SI. No 112 of 2013) implements the Environmental Management Act 2011 and concerns a wide variety of matters regarding environmental protection including air quality control, waste management, hazardous waste, and other substances harmful to the environment such as pesticides and ozone-depleting substances. E-Waste belongs to the fifth schedule, regulation 18 (1), list of hazardous wastes, 'Waste electronic or electronic assemblies' Any contractor that is contracted to treat, handle, transport, store, dispose of, transit, trade in shall hold a ZEMA hazardous waste license. Project related E-waste could end up in a landfill site. However, any hazardous waste disposal using this method, the landfill must be managed in accordance with the guidelines prescribed in the regulation's ninth schedule and in accordance with section 24. (2) the requirements of an operator at a hazardous waste disposal site. There will be no transboundary movement of project related hazardous waste.

4.4.2 Electronic Waste Management in Zambia

Legal and Policy Assessment of E-Waste Management in Zambia

Currently, Zambia does not have explicit regulations on e-waste. However, the regulations of e-waste are part of the Environmental Management (Licensing) Regulations, Statutory Instrument No.112 of 2013 (the Licensing Regulations), under the hazardous waste regulations. The definition of hazardous waste covered e-waste, which category had been specifically identified as a waste stream under the fifth to seventh schedules of the licensing Regulations. Part IV of the Licensing Regulations provided for licensing of the generation, transportation, storage, handling, pre-treatment, treatment, export, import, trade in transit and disposal of hazardous waste.

The extended Producer Responsibility Statutory Instrument (SI) No. 65 of 2018 is also used to regulate e-waste. The SI encourages reuse, recycling or recovery before disposal. The SI also extends the responsibility of the producer to the post-consumer stage of the product lifecycle. This offers an opportunity for both manufacturers and importers to take back and recycle the products placed in the national markets.

Following a Performance Audit on Management of E-waste in Zambia by the Auditor General in September 2020, a Parliamentary Committee recommended an in-depth assessment on the gaps in policy and legislation on e-waste, quantities and types of e-waste generated and disposed of by different categories of players in the country needs to be conducted. The assessment will provide enough information to guide the scope of the policy and regulatory framework. The Committee also noted that without a very clear Policy and regulatory framework, it has been very difficult for Local Authorities who are a key player to manage e-waste in its entirety from generation, segregation, collection, handling, storage, transportation, categorization, treatment, recycling and final disposal including the after care of e-waste disposal sites.

However, Zambia is a signatory to the Basel Convention of 1989 where member states agreed to ensure that disposal of hazardous waste was consistent with the protection of human health and the environment whatever the place of their disposal. The Convention regulates the transboundary- movement of hazardous waste and other waste and obliges its parties to ensure that such wastes are managed and disposed of in an environmentally sound manner or to export the waste to a country with the necessary facilities.

(a) In view of the above, on 29 April 2016, ZICTA signed a Memorandum of Understanding (MoU) with Zambia Environmental Management Agency (ZEMA). The MoU was entered into to establish the way the parties will collaborate and interact with each other with respect to the effective management of the new and rapidly growing stream of electrical and electronic waste and the enablement of a sustainable environment insofar as it relates to ICTs. The scope of the ZICTA-ZEMA MoU is outlined below:
(b) Developing and monitoring of standards and guidelines for environmentally sound management and disposal of electronic waste to avoid duplication of efforts and to also maximize benefits on the use of limited resources.
(c) Developing standards and mechanisms to promote green ICTs, energy efficiency and environmental sustainability.
(d) Protecting human health and the environment which shall be achieved by recognizing the mandate given to the Authority by the ICT Act to establish and publish technical standards relating to all electronic communications equipment and to perform type approval of all ICT equipment to be used in Zambia based on these standards.

The Zambia Bureau of Standards (ZABS) is the body responsible for standards formulation, quality control, quality assurance, and import and export quality inspections. By June 2021, ZABS and the Energy Regulation Board (ERB) supported by Africa Clean Energy Technical Assistance Facility (ACE TAF) adopted and gazetted the International Electronical Commission (IEC) 62257-9-5 and 62257-9-8 Standards for both solar systems and solar home systems.

The ZABS and ZICTA are leading the adoption of e-waste standards with 11 proposed standards of which 4 have been adopted. Under the existing legal frameworks, some private sector players have ceased the opportunity to collect, dismantle, repackage e-waste and transport the waste to neighbouring countries for recycling.

4.3 World Bank Environmental and Social Standards (ESS)

The project will follow national legislation, ESHG and GIIP for the management of E-waste. The project will avoid the disposal of E-waste by reuse, recycle and recover. Where E-waste cannot be reused, recycled, or recovered then the project will treat, destroy or dispose of E-waste in accordance with the Environmental Management (Licensing) Regulations (SI. No 112 of 2013). That is, when hazardous waste management is conducted by third parties, the project will use ZEMA license hazardous waste contractors and all E-waste will be disposed of in hazardous waste landfill in accordance with the Environmental Management (Licensing) Regulations (SI. No 112 of 2013)**.**

The WB EHSG promotes waste prevention, reuse, and recycling, good housekeeping, inventory control, avoidance of damage and instituting procurement measures that allow the return of reusable material. It requires the segregation of hazardous type wastes from other waste, its appropriate storage (labelled containers) and record keeping. It allows collection, transport, and disposal in accordance with the Environmental Management (Licensing) Regulations (SI. No 112 of 2013). The EHSG also requires monitoring records for hazardous waste collected, stored, or shipped using the recommended procedures (see below).

4.4. Good International Industry Practice (GIIP)

The GIIP promotes the use of an obligation on distributors to offer to consumers a take-back system where electronic waste-waste items may be disposed of free of charge. There are two types of take-back systems, and that distributors of EEE items must offer one of these schemes to their customers. Examples include free in-store take-back scheme where distributors accept E-waste items from customers purchasing equivalent new items. Distributors take-back scheme where consumers can dispose of WEEE items free of

charge at designated collection facilities. E-waste generators should manage and dispose of E-waste responsibly in ways already mentioned in the preceding paragraphs. In addition, when purchasing a new electrical item arrange with the retailer to collect the old one. Businesses and other users (i.e., schools, hospitals, and government agencies) of electrical and electronic goods (EEE) must ensure that all separately collected E-waste is treated and recycled.

5.0 Identification of Electronic Waste

Anticipated Electronic Waste Generation

Under Component 2. a of the GEWEL 2, different Information and Communication Technologies (ICTs) and digital systems will be procured to supplement the SCT.MCDSS Department of Information, Communication and Technology (ICT) will support digital systems strengthening. Currently, the World Bank is supporting the MCDSS to conceptualize the design of several digital information technology (IT) systems, namely the Digital Strategy for the SP Sector, Business Continuity and Disaster Recovery Plan (BCP), and a Social Registry. The design of these digital solutions and IT systems will be finalized and operationalized under GEWEL 2, of which the Social Registry will be particularly critical in supporting the Government's priority of establishing a digital tool that can rapidly and cost-efficiently identify and provide emergency assistance to disaster- and climate-vulnerable population in times of shocks. The Social Registry will also be useful in coordinating and linking beneficiaries to relevant SP and other social programs for improved welfare. As such, opportunities to enhance dynamism of Zambia's Social Registry will be explored, including updates to the registry through 'big data' such as mobile phone data or devolution of the registry toward making it an on-demand system.

Different ICTs will be procured such as computers, scanners, printers, servers, mobile devices and chassis for data storage and backup facilities, networking and connectivity (LAN/WAN); and other equipment, telecommunication devices such as phones, battery powered devices, and electronic queue. Also, the obsolete ICTs will be discarded and replaced with new ICTs. The obsolete ICTs and components used in managing and operating the digital system, and the newly procured ICTs after the end of their useful life will become the electronic waste.

The environmental and social impacts include:

(a) Toxic Substances: E-waste often contains hazardous materials such as lead, mercury, cadmium, and brominated flame retardants. If improperly disposed of, these substances can leach into the soil and water, contaminating ecosystems and posing health risks to communities.
(b) Resource Depletion: Many electronic components are made from non-renewable resources like rare earth metals. Improper disposal leads to the loss of these valuable materials, which could otherwise be recycled.
(c) Health Risks: Improper handling or disposal of e-waste, particularly through informal recycling processes, can expose workers and local communities to harmful chemicals, leading to respiratory issues, neurological damage, and other health problems.
(d) Social Inequities: In some cases, e-waste is exported to developing countries where informal recycling practices may lack adequate health and safety measures, resulting in exploitation of vulnerable populations and environmental degradation.

Table below provides some of the ICT's devices that will be procured under the GEWEL 2. The actual specifications and quantities of these ICTs will be known during project implementation.

Table 0-2: Overview of Information Technologies Equipment (ICTs)

S/N	ITEM	QUANTITY
1	Laptops/Desktops	To be advised (TBA
2	Mobile devices	TBA
3	Printers	TBA
4	Battery powered devices	TBA
5	Communication Equipment	TBA
6	Chassis for Servers and Storages	TBA
7	Servers	TBA
	Network Equipment for Data Centre	TBA
9	Data Storage	TBA
	Telecommunication devices	TBA
11	Automated Digital Devices	TBA

It is expected from the above table that electronic waste generation will most likely be during and after project life. The quantities of electronic waste expected to be generated will only be known after the actual quantities to be procured have been known.

Similarly, the list, type and quantities of obsolete ICTs is not yet available and shall only be known during project implementation. Once the quantities are known, the electronic waste management plan shall be updated accordingly.

A post project environmental audit shall be required to ensure that the disposal of the ICTs devices is according to this electronic waste management plan.

5.1 Proposed Mitigation Measures

This electronic waste management plan contains proposed mitigation measures through which electronic waste under the GEWEL 2 may be managed in compliance with the Environmental Management Act No.12 of 2011 that is read together with the Environmental Management (Licensing) Regulation, Statutory Instrument No.112 of 2013.

The proposed mitigation measures have also adopted the World Bank Environmental and Social Standards (ESS) in particularly ESS3: Resource Efficiency and Pollution Prevention and Management, World Bank Environmental Safety and Health Guidelines (WB ESHG) and Good International Industry Practice.

The mitigation measures are aimed at avoiding, minimizing, and reducing potential environmental and social impacts related to generating and disposal of electronic waste during the implementation of the GEWEL 2. Table below presents a description of some of the mitigation measures that have been proposed under the GEWEL 2.

Table 0-3: Electronic Waste Management and Monitoring Plan

Potential Risk and Impact	Proposed Mitigation Measures	Indicator for Monitoring	Responsibility	Budget (USD)
Increase in e-waste generation	• E-Waste Reduction Strategies • Choose ICT hardware with a longer lifespan and energy-efficient components to reduce the frequency of replacements. • Conduct regular maintenance and updates of hardware and software systems to extend their useful life. • Salvage usable components from obsolete equipment for repairs or refurbishment of other devices. • Conduct a Life cycle assessment of ICT equipment to identify environmental impacts at each stage, from procurement to disposal. • Circular Economy Approach: Encourage practices that reduce waste by promoting reuse, refurbishment, and recycling throughout the lifecycle of ICT components.	• Reduced waste generation	GEWEL 2	-
Air Pollution through improper disposal which leads to release of toxic, hazardous, and carcinogenic gaseous. **Human Health Impacts due to poor disposal.** **Pollution of Water Sources Electrical and electronic equipment contain different hazardous materials, which are**	• Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted. • Reuse and recycle all E-waste where applicable and possible. Establish E-Waste collection points at GEWEL 2 components where there is potential for e-waste generation: including collection bins/receptacles. • Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.	• Warranty and take back schemes for Electronic Devices purchased. • Credibility of manufacturers supplying the electronic devices • Availability of E-waste receptacles at GEWEL 2 sites • Number of awareness and trainings conducted for users of electronic devices on E-waste.	GEWEL 2	40,000

harmful to human health and the environment if not disposed of carefully		• E-waste certificates of disposal using licensed hazardous waste contractors and licensed		
Soil Contamination Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully. This may lead to soil contamination including landfills	• Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. If possible, select sources offering repair and take back schemes. • Ensure insurance coverage and electronic physical protective devices are fitted. • Reuse or recycle all E-waste using credible firms registered with ZEMA. • Establish E-Waste Collection Centres at all generation points: including collection bins/receptacles. • Use licensed hazardous waste contractors and licensed hazardous waste landfill sites. • Create and maintain records of all E-waste items for disposal, securely store and prepare for shipment correctly. • Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management.	• Warranty and take back schemes for Electronic Devices purchased. • Credibility of manufacturers supplying the electronic devices • Availability of E-waste receptacles at all GEWEL 2 sites generating sites • Number of awareness and training conducted for users of electronic devices on E-waste. • E-waste certificates of disposal using licensed hazardous waste contractors and licensed hazardous waste landfills.	GEWEL 2	30,000
Growth of informal E-waste disposal centres. Improper and indiscriminate disposal of E-waste is likely to lead to the exponential increase of informal waste disposal centres in communities	• Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste. • Conduct awareness and sensitizations. • Where possible, select sources offering repair and take back schemes. Ensure insurance coverage and electronic physical protective devices are fitted.	• Warranty and take back schemes for Electronic Devices purchased. • Credibility of manufacturers supplying the electronic devices	GEWEL 2	30,000

which further exacerbates the problem of E-waste	• Establish E-Waste Collection Centres at all GEWEL 2 sites: including collection bins/receptacles. • Use licensed hazardous waste contractors and licensed hazardous waste landfill sites. • Create and maintain records of all E-waste items for disposal, securely store and prepare for shipment correctly.	• Availability of E-waste receptacles at all centres GEWEL 2 sites • Number of awareness and training conducted for users of electronic devices on E-waste. • E-waste certificates of disposal using licensed hazardous waste contractors and licensed hazardous waste landfills.		
TOTAL				**100,000**

Annex 7: INTEGRATED PEST MANAGEMENT PLAN

The GEWEL 2 will adopt and implement the Integrated Pesticide Management Plan as part of the ESMP to manage pesticides consistent with ESS 3, ESHGs and GIIP. An Integrated Pest Management (IPM) plan is crucial in a social cash transfer project when such programs support agricultural activities. Cash transfers will support the beneficiaries invest in farming, potentially increasing the use of pesticides, herbicides, and other agricultural chemicals. An IPM plan will ensure that these chemicals are used sustainably and that pest management practices are environmentally sound and safe for communities. IPM refers to a mix of farmer-driven, ecologically based pest control practices that seeks to reduce reliance on synthetic chemical pesticides. It involves: (a) managing pests (keeping them below economically damaging levels) rather than seeking to eradicate them; (b) integrating multiple methods (relying, to the extent possible, on nonchemical measures) to keep pest populations low; and (c) selecting and applying pesticides, when they have to be used, in a way that minimizes adverse effects on beneficial organisms, humans, and the environment.

a) Sources of pesticide and fertiliser use

On the project, the source of pesticides and fertilisers may be under the SCT and SWL components which promote agriculture activities. Certain individuals or women groups, especially those involving agriculture might increase the use of chemicals and pollutants, affecting local ecosystems. Pesticide runoff can contaminate soil and water resources, affecting local ecosystems and biodiversity. Pesticides can affect non-target species, including beneficial insects, wildlife, and plants. Intensive agricultural enterprises often involve the use of pesticides and fertilisers, which can pose health risks to through inhalation, ingestion, or skin contact.

1. Pesticides

Pesticides are used to control pests, weeds, and diseases in agriculture. They are classified into several categories based on their target organisms and chemical composition.

(i) Insecticides (Target: Insects)

- Organophosphates examples include malathion, chlorpyrifos, and parathion. Highly toxic to humans and animals. Organophosphates interfere with the nervous system by inhibiting acetylcholinesterase, leading to symptoms such as headaches, dizziness, nausea, and in severe cases, convulsions and death.
- Carbamates include carbaryl and aldicarb. Similar to organophosphates, these affect the nervous system. Acute exposure can cause muscle weakness, respiratory distress, and seizures.
- Pyrethroids include permethrin and cypermethrin. Toxicology: Generally, less toxic to humans but can cause skin and respiratory irritation. High exposure may cause dizziness, nausea, and loss of coordination.

(ii) Herbicides (Target: Weeds)

- Glyphosate (e.g., Roundup) is considered low toxicity in acute cases, but there are concerns about potential carcinogenic effects with long-term exposure.
- Atrazine is moderately toxic and can cause endocrine disruption, affecting reproductive health. Long-term exposure can lead to respiratory problems and skin irritation.
- Paraquat is extremely toxic. Ingestion, inhalation, or skin contact can cause severe lung, liver, and kidney damage, and even death. It is highly restricted due to its toxicity.

(iii) Fungicides (Target: Fungal Diseases)

- Copper-based fungicides (e.g., copper sulphate). Can cause gastrointestinal distress if ingested. Prolonged exposure can lead to liver and kidney damage.
- Chlorothalonil. Moderately toxic; may cause skin and eye irritation. There is some evidence of carcinogenicity with long-term exposure.
- Mancozeb is low acute toxicity but suspected of endocrine disruption and can cause respiratory irritation.

(iv) Rodenticides (Target: Rodents)

- Warfarin and Brodifacoum are considered as anticoagulants that cause internal bleeding in rodents. In humans, they can cause prolonged bleeding and haemorrhaging if ingested accidentally.

2. Fertilizers

Fertilizers provide essential nutrients to crops but can also cause environmental and health risks if misused. They are generally classified into chemical and organic fertilizers.

(i) Nitrogen-based Fertilizers such as ammonium nitrate, urea, and ammonium sulphate. These are high concentrations can lead to nitrate poisoning in humans and animals, causing methemoglobinemia (reduced oxygen-carrying capacity of blood). Ammonia exposure can cause skin, eye, and respiratory irritation.
(ii) Phosphorus-based Fertilizers such as superphosphate, triple superphosphate. Generally low toxicity, but overuse can lead to phosphorus runoff, contributing to waterway pollution and eutrophication, which harms aquatic life.
(iii) Potassium-based Fertilizers such as potash, potassium sulphate. Low toxicity to humans, but high exposure can cause skin irritation or digestive distress if ingested.
(iv) Compound Fertilizers (NPK Fertilizers): These contain a combination of nitrogen (N), phosphorus (P), and potassium (K) in varying ratios. Similar to individual components, NPK fertilizers can lead to nitrate poisoning and skin or respiratory irritation.
(v) Organic Fertilizers such as manure, compost, with generally lower in toxicity compared to chemical fertilizers. However, improper handling can lead to exposure to pathogens (e.g., E. coli, Salmonella), causing gastrointestinal illness. Nitrogen-rich organic fertilizers can also contribute to nitrate contamination of water sources.

3. Other Agricultural Chemicals

(i) Soil Amendments includes lime, gypsum, and dolomite. Low toxicity, but dust from lime or gypsum can irritate the respiratory system and eyes. Chronic exposure may cause lung issues
(ii) Adjuvants (Additives to Pesticide Sprays) such as surfactants, emulsifiers, stickers. Generally considered low toxicity, but improper use can cause skin and eye irritation. Some may have more toxic properties when mixed with pesticides.

Occupational health and safety risks of handling and using pesticides and management measures

Many pesticides used in farming systems, especially organophosphates and carbamates, pose immediate health risks, such as poisoning, respiratory problems, and neurological effects. Herbicides like paraquat are extremely toxic in even small amounts. Long-term exposure to certain pesticides (e.g., glyphosate, atrazine) and fertilizers (especially nitrates) can lead to serious conditions such health conditions. In addition, runoff from fertilizers and pesticides can contaminate water supplies, harm aquatic life, and lead to biodiversity loss. Some of the OHS risks are indicated below:

(a) Chemical Exposure: Pesticides can release fumes, dust, or vapours that workers inhale while spraying, mixing, or applying. This can lead to acute respiratory problems, dizziness, or long-term lung damage. Many pesticides can be absorbed through the skin, causing irritation, rashes, or more severe toxic reactions. Splashing during mixing or application can lead to eye irritation, damage, or even blindness

in extreme cases. Accidental ingestion due to poor hygiene (e.g., not washing hands before eating) or improper storage of pesticides in food containers can lead to poisoning.

(b) Chronic Health Impacts: Prolonged or repeated exposure to pesticides has been linked to chronic health issues such as cancer, neurological disorders, reproductive problems, and liver or kidney damage. Certain pesticides can accumulate in the body over time, increasing the risks of serious health conditions.

(c) Improper Use and Lack of Training: Without proper training, farmers may use incorrect dosages of pesticides, leading to increased exposure risks. Overuse or mixing different pesticides can exacerbate health risks. Many smallholder farmers lack access to appropriate PPE (gloves, masks, goggles, etc.), increasing the chances of pesticide exposure. Handling concentrated forms of pesticides, especially without understanding safety measures, can increase exposure to toxic chemicals.

(d) Pesticide Storage Risks: Storing pesticides in homes or in areas where food is kept can lead to accidental contamination. In some cases, pesticides are stored in unlabelled containers, which increases the risk of accidental ingestion, particularly by children. Improperly sealed containers or leaking equipment can lead to contamination of the work area, exposing workers and the environment to hazardous chemicals.

(e) Spray Drift and Environmental Exposure: Pesticides applied in windy conditions can drift into nearby areas, exposing workers, bystanders, or family members who are not directly involved in pesticide application. Children and pregnant women are particularly vulnerable. Improper handling can result in the contamination of local water supplies, which can affect the health of entire communities.

(f) Physical Risks: Manual pesticide application, especially over large areas, can lead to fatigue and overexertion, which can cause workers to lose focus and make mistakes that increase exposure risks. Workers may face slips, trips, or falls while carrying heavy pesticide containers or equipment, especially in uneven or slippery fields.

Table 1. Pest Management Plan

Risk/Concern	Environmental Prevention/Mitigation Measures	Responsible Party
Chemical Exposure	• Ensure that beneficiaries have access to appropriate PPE (gloves, masks, goggles, long sleeves, etc.) to minimize direct exposure to chemicals. • Provide guidelines on proper usage, cleaning, and replacement of PPE. • Provide training on first aid measures in case of pesticide poisoning or accidents, including access to medical treatment. • Have safety data sheets (SDS) for each pesticide readily available to provide crucial information during emergencies.	GEWEL 2
Chronic Health Impacts	• See proposed measures above • Implement regular health checks for workers exposed to pesticides to monitor for early signs of pesticide-related illnesses. • Encourage beneficiaries to seek immediate medical help if they experience symptoms of pesticide exposure. • Emergency preparedness and response plan will be in place in each district and complaints/ incidents procedures should be developed.	GEWEL 2
Integrated Pest Management (IPM)	• Encourage beneficiaries to adopt IPM practices to reduce reliance on chemical pesticides by using biological, mechanical, and cultural pest control methods.	GEWEL 2

	• The project will consider less hazardous substitutes where hazardous materials are intended to be used in the project implementation. • Adopt environmentally friendly pest control methods and practices, such as organic farming and the use of natural predators. Implement buffer zones and proper waste disposal practices to prevent contamination • The project will ensure that all pesticides used will be manufactured, formulated, packaged, labelled, handled, stored, disposed of, and applied according to relevant international standards and codes of conduct, as well as the EHSGs. • In the procurement of any pesticide the project will train the beneficiaries to assess the nature and degree of associated risks, taking into account the proposed use. • The project will not use any pesticides or pesticide products or formulations unless such use is in compliance with the National pesticide and toxic substances regulations including the Environmental Management (Licensing) Regulations, 2013 and Bank EHSGs. In addition, the project will also not use any pesticide products that contain active ingredients that are restricted under applicable international conventions or their protocols or that are listed in, or meeting, the criteria of their annexes, unless for an acceptable purpose as defined by such conventions, their protocols or annexes, or if an exemption has been obtained by the project under such conventions, their protocol or annexes, consistent with national commitments under these and other applicable international agreements. • The project will also not use any formulated pesticide products that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies. For any other pesticide products that poses other potentially serious risk to human health or the environment and that are identified in internationally recognized classification and labelling systems. • The project will not use pesticide formulations of products if: (a) the country lacks restrictions on their distribution, management and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly. • Additional criteria for the selection and use of such pesticides: (a) they will have negligible adverse human health effects; (b) they will be shown to be effective against the target species; (c) they will have minimal effect on nontarget species and the natural environment. The methods, timing, and frequency of pesticide application are aimed to minimize damage to natural enemies.; (d) their use will take into account the need to prevent the development of resistance in pests; and	

	(e) where registration is required, all pesticides will be registered or otherwise authorized for use on the crops and livestock, or for the use patterns, for which they are intended under the project.	
Spray Drift and Environmental Exposure	• Promote the use of proper spraying techniques to minimize spray drift, such as applying pesticides in calm weather and at appropriate distances from water bodies and other people. • Encourage the use of less toxic or natural alternatives to pesticides, where possible. • Use targeted and selective pesticides that minimize harm to non-target species. Promote biodiversity through practices such as planting cover crops and maintaining natural habitats.	GEWEL 2
Pesticide storage risks	• Promote safe pesticide storage practices by encouraging the use of dedicated storage facilities, away from living areas and food storage. • Ensure that pesticides are stored in clearly labelled, original containers to avoid confusion and prevent accidental ingestion.	GEWEL 2
Improper Use and Lack of Training	• Provide comprehensive training to farmers and workers on the safe handling, application, and disposal of pesticides. • Educate on the importance of using the correct pesticide dosage and the risks of overuse. • Train on the use and maintenance of PPE and safety equipment.	GEWEL 2
Improper disposal of Pesticide Waste	• Train workers on the safe disposal of pesticide containers and waste to prevent environmental contamination and human exposure. • Provide collection points or services for the safe disposal of pesticide containers to prevent reuse or improper disposal. • Set up collection points for used chemical containers and work with waste management companies specializing in hazardous waste or the manufacturers of the chemicals. Provide training on safe handling and disposal procedures. Team up with other industries or businesses that can use by-product	GEWEL 2

Annex 8: E&S SCREENING FORM FOR WASH FACILITIES

Republic of Zambia

Ministry of Health

GIRLS' EDUCATION AND WOMEN'S EMPOWERMENT AND LIVELIHOODS FOR HUMAN CAPITAL PROJECT (P181391)

Environmental and Social Screening Form for

Rehabilitation of WASH Facilities in Selected Health Centers

ENVIRONMENTAL AND SOCIAL SCREENING FORM

Filled and prepared by:
Name……
Position……
Date: ……

Part A: Project Background

Name of the Proposed Project	
Location	**Coordinates:**
Name of the Health Facility	
Sections for Rehabilitation/Construction	
Screening # 1: Project Eligibility	
Is the project included in the Exclusion List? (Y/N)	If answer is Yes, screening should be stopped and should not be continued

Part B: Brief Description of Scope of the Project Activities:

Screening # 2: Environmental and Social Screening:

Questions considered	Yes/ No/	Comment (if yes, explain)	Mitigation
Will the rehabilitation and expansion of health facilities cause the following:			
Require land for its development, and therefore displace individuals, families, or businesses from land that is currently occupied, or restrict people's access to crops, pasture, fisheries, forests, or cultural resources, whether on a permanent or temporary basis?			
Increased dust, noise, water pollution, solid/hazardous/ toxic wastes, waste oil/fuels, public health and safety risks, possible generation of asbestos containing materials due to repair of damaged infrastructure including, but not limited to water supply and sanitation systems?			
Use water during or after construction, which will reduce the local availability of groundwater and surface water?			
Will it involve the use raw materials such as sand, gravel, aggregate and timber?			
Affect the quantity or quality of surface waters (e.g., rivers, streams, wetlands), or groundwater (e.g., wells, reservoirs)?			
Generation of solid waste from rehabilitation materials such as off-cuts from timber and celling boards, empty paint containers and bags of cement, liquid and hazardous waste (thinners, tile fix and paint			
Will construction or renovation works require new borrow pits or quarries to be opened?			
Create waste that could adversely affect local soils, vegetation, rivers and streams or groundwater.			
Create pools of water that provide breeding grounds for disease vectors (for example malaria or bilharzia)?			
Involve excavations, demolition, and movement of earth, causing poor air quality due to increased dust levels generated from uncovered construction materials and vehicles traversing unpaved roads in dry conditions.			

Workers, health facility staff and the community accessing services in the building and nearby the project site are likely to be exposed to dust emission (especially particulate matter PM_{10} and $PM_{2.5}$) during construction phase of the project			
Spread of infectious disease affecting community and occupational health and safety due to rehabilitation of wards?			
Are works likely to cause significant negative impacts to air and / or water quality?			
Will it cause fire safety risks due to demolition debris including timber and drywall as well as oil-based paints, solvents and other materials which are flammable under certain conditions?			
Result in human health or safety risks during construction or operation phase? E.g., increased health risks due to exposure to medical waste, toxic materials, asbestos-contaminated debris			
Are there seismic risks with regards to stability of buildings to be rehabilitated?			
Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			
Is there a risk of increased community exposure to communicable disease, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			
Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers			
Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?			
Will the Project produce solid wastes during construction or operation or decommissioning?			
Noise and vibrations causing annoyance and hearing disturbance on the community nearby and those accessing health care services			
Does the subproject involve uses of goods and equipment involving forced labour, child labour, or other harmful or exploitative forms of labour?			

Result in a significant change/loss in livelihood of individuals?			
Adversely affect the livelihoods and /or the rights of women?			
Would any other public facilities, such as schools, health clinics, and church be negatively affected by construction?			
Will the project cause disruption in traffic movement in the area including access to healthcare services during construction?			
Are there pit latrines to be decommissioned?			
Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			
Do any of the construction works involve the removal of asbestos or other hazardous materials? Or unspent PV batteries?			

Format 2.0: Screening Checklist Review Form (by Environmental and Social Specialists)

Part C: Summary of the risks and Impacts

Part D: Reviewer's Conclusion

Which course of action do you recommend?

☐ **ESMP**

Review form completed by: **Date reviewed:**

Name:…….

Position: Environmental Specialist…….

Signature…….

Name: …….

Position: Social Specialist ……

Signature…….

Completion of this screening form will facilitate the identification of potential environmental and social impacts, determination of their significance, assignment of the appropriate environmental category, proposal of appropriate environmental mitigation measures.

Google Image/Picture of the proposed site

Annex 9: SITE SPECIFIC ESMP TEMPLATE

Annex 10: OHS MANAGEMENT PLAN FOR WASH CONSTRUCTION SITES

1. OHS Management Plan for Key Rehabilitation Activities

Activity	Potential Hazards	Mitigation Measures	Responsible Party	Monitoring and Evaluation
Site Preparation	Slips, trips, falls	• Site Induction. Ensure all workers receive a safety induction covering site hazards, emergency procedures, and the use of PPE. • Clear debris and hazards Install warning signs. Use clear signage to indicate hazards, safety rules, and emergency exits. • Limit site access to authorized personnel only and clearly mark entry and exit points.	MoH Site Supervisor	Weekly site inspections
Excavation and Trenching	Cave-ins, falling materials	• Use shoring and sloping techniques. Use shoring or sloping techniques for trenches deeper than 1.2 meters to prevent cave-ins. • Conduct daily inspections of excavation sites for signs of instability. • Ensure proper training	MoH Site Engineer	Daily inspections before work commences
Construction of WASH Facilities	Lifting injuries, cuts, exposure to dust	• Provide lifting aids Ensure PPE is worn (gloves, masks). Ensure all workers are provided with appropriate PPE, including helmets, gloves, masks, goggles, and high-visibility clothing. • Conduct training sessions on the correct use, maintenance, and limitations of PPE. • Provide training on proper lifting techniques to minimize musculoskeletal injuries. • Employ lifting aids such as dollies, hoists, or forklifts for heavy materials.	MoH Foreman	Monitor incident reports weekly

Plumbing Installation	Water exposure, electric shock	• Ensure electrical systems are off Use insulated tools	MoH Plumber	Regular safety audits and toolbox talks
Installation of Sanitary Facilities	Strains from lifting, cuts	• Use proper lifting techniques Provide training	MoH Site Supervisor	Conduct training sessions and evaluate participation
Water Quality Testing	Chemical exposure, slips	• Use appropriate PPE Ensure safe handling of chemicals	MoH Health and Safety Officer	Monitor compliance with safety data sheets
Waste Management	Biological hazards, cuts, exposure	• Use proper disposal methods Train staff on hazardous waste handling • Implement waste segregation practices for hazardous and non-hazardous waste. • Arrange for regular collection and disposal of waste by licensed waste management services. • Maintain accessible MSDS for all hazardous materials on site and ensure workers are familiar with them. • Establish protocols for the safe handling, storage, and disposal of hazardous materials, including chemicals used in water treatment.	MoH Site Foreman	Inspect waste management practices weekly
Hygiene and Sanitation	Infection risks, slips	• Ensure access to hygiene facilities. Provide adequate sanitation facilities, including clean water and soap, for all workers. • Maintain a regular cleaning schedule for all site facilities to prevent the spread of infections. • Regular cleaning schedules	MoH Health and Safety Officer	Monitor cleanliness and hygiene practices
Emergency Preparedness	Injuries, fire hazards	• Establish emergency response procedures • Conduct drills • Develop and communicate an emergency response plan, including evacuation routes,	MoH Project Manager	Review and update emergency plans quarterly

		assembly points, and emergency contacts. • Provide first aid training to selected staff and ensure first aid kits are readily available on site.		
Training and Communication	Lack of awareness of safety practices	• Conduct regular OHS training • Share safety bulletins • Keep training records on site	MoH HR and Safety Coordinator	Assess training effectiveness through feedback

1.0Community Health Management plan

Activity	**Community Health Risks**	**Mitigation Measures**	**Responsible Party**	**Monitoring and Evaluation**
Community Engagement	Misinformation, resistance to project	• Conduct awareness campaigns • Engage community leaders	MoH Community Liaison Officer	Survey community feedback periodically
Health Education	Lack of knowledge on hygiene practices	• Organize workshops on hygiene and sanitation	MoH Health Educator	Evaluate participation and knowledge gain
Monitoring Water Quality	Health risks from contaminated water	• Regular testing of water quality • Inform community of results	MoH Health and Safety Officer	Document and report water quality findings
Waste Disposal Management	Risk of disease from improper disposal	• Ensure proper waste management practices • Educate community on waste disposal	MoH Environmental Officer	Community feedback on waste management practices
Emergency Response Plan	Delayed response to health emergencies	• Train community health workers • Establish communication channels	MoH Project Manager	Simulate emergency scenarios to test response

3. Emergency Response and Preparedness Plan

1. Introduction

This Emergency Response and Preparedness Plan outlines the procedures and responsibilities for responding to emergencies related to the Water, Sanitation, and Hygiene (WASH) rehabilitation activities at each health facility. It aims to protect the health and safety of workers, patients, and the community. The plan shall be adapted and updated by the Contractor and the E&S Specialist before any works commence.

2. Objectives

- Ensure rapid and effective response to emergencies.
- Minimize health risks and environmental impacts.
- Protect clinic staff, patients, and community members.
- Comply with legal and regulatory requirements.

3. Emergency Scenarios

- Flooding: Due to heavy rain or overflowing water bodies.
- Chemical Spill: From hazardous materials used in rehabilitation.
- Infectious Disease Outbreak: Related to inadequate sanitation or water quality.
- Fire Incident: Involving electrical equipment or flammable materials.
- Accidents/Injuries: Injuries to workers or patients during rehabilitation activities.

4. Emergency Response Procedures

Emergency Type	Immediate Actions	Responsible Party	Follow-Up Actions
Flooding	Evacuate personnel to higher ground	Site Supervisor	Assess damage, report to authorities
	Shut off electrical equipment		Implement drainage solutions
Chemical Spill	Evacuate the area	Health & Safety Officer	Contain spill, follow MSDS procedures
	Notify emergency services		Arrange for safe disposal
Infectious Disease Outbreak	Implement infection control measures	Clinic Manager	Notify health authorities
	Isolate affected individuals		Conduct contact tracing
Fire Incident	Activate fire alarm	All Staff	Evacuate building, contact fire services
	Use fire extinguishers if safe		Conduct fire drill and debrief

Accidents/Injuries	Provide first aid	Trained First Aid Personnel	Document incident, notify supervisor
	Call for medical assistance if necessary		Review and improve safety protocols

5. Roles and Responsibilities

- Emergency Response Team: Designated personnel trained in emergency response.
- Site Supervisor: Oversees the implementation of the emergency plan and coordination with local emergency services.
- Health & Safety Officer: Monitors health and safety conditions, conducts training, and implements emergency protocols.
- All Staff: Must be familiar with the emergency plan and participate in drills.

6. Training and Drills

- Conduct regular training sessions for all staff on emergency response procedures.
- Schedule drills for various emergency scenarios to ensure preparedness.
- Review and update training materials based on lessons learned from drills.

7. Communication Plan

- Establish a clear communication protocol for reporting emergencies.
- Ensure all staff have access to emergency contact numbers, including local emergency services.
- Use signage and announcements to inform staff and patients during emergencies.

8. Monitoring and Review

- Regularly review and update the emergency response plan based on new risks or changes in operations.
- Conduct after-action reviews following any emergency to identify strengths and areas for improvement.

4. Contractor Site Demobilisation Plan

A Contractor Demobilization Plan is a detailed plan outlining the steps and procedures for safely and efficiently winding down operations, campsite, offices, removing equipment and materials, and restoring the project site once the project's WASH rehabilitation activities have been completed. This plan is essential to ensure that environmental, safety, and contractual obligations are met during the demobilization phase. The plan shall be adapted, costed and updated by the Contractor and the E&S Specialist before any works commence.

Contractor Demobilization Plan Outline

1. Objective

The purpose of this plan is to guide the safe and organized removal of contractor resources from the site, ensuring compliance with environmental, safety, and contractual requirements. The demobilization process will minimize disruptions, prevent environmental degradation, and ensure that the site is left in the condition agreed upon with the MoH/ WB.

2. Demobilization Schedule

- Set a specific timeframe for the demobilization activities, including key milestones and deadlines for completing specific tasks.
- Create a detailed schedule of activities such as equipment removal, site cleanup, waste disposal, and personnel relocation.

3. Resource Management

- Organize the phased removal of workers from the site. Ensure all staff are debriefed, and exit interviews or clearances are completed as required.
- List all equipment, machinery, and materials on-site, including those requiring specialized handling during removal.
- Develop a waste management strategy that includes safe handling, transportation, and disposal of construction materials, hazardous waste, and general refuse.

4. Site Restoration and Cleanup

- Detail how the site will be cleaned of construction debris, excess materials, and waste.
- Where necessary, plan for the restoration of any land or structures affected by the project to their original state or an agreed-upon condition.
- Ensure the site meets environmental regulations regarding land restoration, water drainage, and waste management.

5. Health and Safety Measures

Conduct a risk assessment specific to demobilization activities, ensuring that all potential hazards are identified and mitigated.

Maintain occupational health and safety protocols to protect workers during the demobilization phase.

Define emergency response procedures in case of accidents or incidents during the demobilization process.

6. Environmental and Social Compliance

- Waste Management: Follow guidelines for the disposal of construction waste, hazardous materials, and other debris in line with environmental regulations.

- Dust and Noise Control: Implement measures to control dust and noise pollution during the removal of equipment and demolition activities.
- Site Rehabilitation: Ensure any environmental commitments, such as replanting vegetation or restoring habitats, are met.

7. Contractual and Regulatory Compliance

- Conduct a thorough inspection of the site to ensure all conditions of the contract are met.
- Obtain any required clearances from the MoH or local authorities before finalizing the demobilization.
- Document all demobilization activities in a final report to the MoH/WB, including details on site conditions, waste disposal, and adherence to health and safety protocols.

8. Stakeholder Communication

- Inform relevant stakeholders (local authorities, community, and project partners) of the demobilization process and timelines.
- Provide stakeholders with a closure report summarizing demobilization activities, including any final assessments or evaluations.

9. Post-Demobilization Review

After completing demobilization, conduct a review to assess the effectiveness of the process and identify any areas for improvement.

Ensure all records, reports, and permits are properly archived for future reference.

These measures are summarised in the following Table:

Contractor Demobilization Plan presented in table form:

Phase	Activity	Details	Responsible Party	Timeline
1. Planning	Develop demobilization schedule	Create a detailed schedule for all demobilization activities including equipment removal, cleanup, etc.	MoH Contractor	Before works and updated 12 weeks prior to demobilization
	Notify stakeholders	Inform local authorities, community, and project partners about demobilization plans and timelines	MoH Contractor	8 weeks prior to demobilization
	Risk assessment	Conduct risk assessment specific to demobilization activities to identify and mitigate potential hazards	MoH Contractor	12 weeks prior to demobilization

Phase	Activity	Details	Responsible Party	Timeline
2. Personnel Demobilization	Phased worker exit	Organize phased removal of workers; ensure all are debriefed, and exit interviews or clearances are complete	MoH Contractor	Throughout demobilization phase
	Final safety training	Conduct final safety briefing for workers involved in the demobilization process	MoH Contractor	2 weeks prior to demobilization
3. Equipment and Material Removal	Equipment decommissioning	Disconnect, disassemble, and safely remove all construction equipment and machinery	MoH Contractor	During demobilization phase
	Transport equipment off-site	Safely transport decommissioned equipment off the site following legal and safety protocols	MoH Contractor	Throughout demobilization phase
4. Waste Management	Dispose of non-hazardous waste	Identify and dispose of non-hazardous construction materials and debris according to local regulations	MoH Contractor	Throughout demobilization phase
	Dispose of hazardous materials	Handle and dispose of any hazardous materials in compliance with environmental and safety regulations	MoH Contractor	During waste disposal
	Recycle salvageable materials	Segregate recyclable materials (e.g., metals, wood) and arrange for proper recycling	MoH Contractor	Throughout demobilization phase
5. Site Restoration	Site cleaning	Remove debris, excess materials, and waste; clean the site thoroughly	MoH Contractor	Final week of demobilization
	Environmental restoration	Implement restoration measures, such as soil stabilization, revegetation, or landscaping as needed	MoH Contractor	After equipment removal

Phase	Activity	Details	Responsible Party	Timeline
	Close-out inspection	Conduct final inspection of the site to ensure all commitments (environmental and contractual) are met	MoH Contractor	After site cleanup
6. Health and Safety	Final OHS inspection	Ensure all demobilization activities adhere to occupational health and safety protocols	MoH Contractor	Throughout demobilization phase
	Emergency preparedness	Maintain emergency response teams on standby for the duration of demobilization phase	MoH Contractor	Throughout demobilization phase
7. Compliance	Final inspections and approvals	Secure final approval from MoH and authorities; ensure compliance with contractual and legal obligations	MoH Contractor	Post-demobilization
	Documentation of site conditions	Complete a report documenting the final condition of the site and any post-demobilization actions	MoH Contractor	Upon completion of site cleanup
8. Handover	Handover of the site	Officially hand over the site to the MoH, including all necessary documentation and compliance records	MoH Contractor	Post-demobilization
	Stakeholder communication	Provide a closure report to stakeholders summarizing demobilization activities	MoH Contractor	Upon project completion
9. Post-Demobilization	Review of demobilization process	Conduct a post-demobilization review to assess the success and challenges of the process	MoH Contractor	1-2 weeks after demobilization
	Archive records	Archive all documentation, reports, and permits for future reference	MoH Contractor	After review

5. Decommissioning Plan for the WASH Rehabilitation Sites

1. Introduction

The MoH WASH activities may involve demolition work and decommissioning of some infrastructure or part of some infrastructure. The WASH infrastructure's lifespan is estimated at 25 years with periodical maintenance works. The infrastructure may later require to be decommissioned in future. This Decommissioning Plan outlines the general steps and procedures necessary to safely and effectively decommission Water, Sanitation, and Hygiene (WASH) facilities during or following the rehabilitation project. The plan ensures compliance with environmental regulations and minimizes any potential adverse impacts on health and the environment. The plan shall be adapted, updated and costed by the Contractor and the E&S Specialist before any works commence.

2. Objectives

- Ensure safe removal and disposal of WASH facilities.
- Minimize environmental impact and risks to public health.
- Comply with legal and regulatory requirements.
- Restore the site to a safe and usable condition.

1. Decommissioning Activities

Activity	**Description**	**Responsible Party**	**Timeline**
Site Assessment	Conduct a comprehensive assessment of the site	MoH Contractor	Prior to decommissioning
Notification	Inform relevant authorities and stakeholders	MoH Contractor	At least 90 days before
Disconnect Utilities	Safely disconnect water, sewage, and electrical connections	MoH Contractor	During decommissioning
Removal of Equipment	Dismantle and remove all WASH-related equipment	MoH Contractor	During decommissioning
Waste Management	Segregate waste into hazardous and non-hazardous categories. Identify and safely manage any hazardous materials (e.g., chemicals, contaminated materials) according to regulations.	MoH Contractor	During removal
Site Restoration	Restore the site to its original state or as agreed upon. Restore the site to its original condition or as per regulatory requirements, including soil stabilization and re-vegetation if needed.	MoH Contractor	Post-removal
Final Inspection	Conduct a final inspection of the site	MoH Contractor	After restoration

4. Waste Management

- Identify and categorize waste generated during decommissioning (e.g., solid waste, hazardous materials, electronic waste).
- Specify the methods for waste disposal, including recycling, landfill, or hazardous waste facilities.
- Maintain records of waste disposal, including quantities and disposal locations.

5. Environmental Considerations

- Implement measures to prevent contamination of soil and water during decommissioning.
- Utilize water sprays and noise-reduction techniques to minimize impacts during equipment removal.
- Stabilize disturbed areas to prevent soil erosion and sediment runoff.

6. Community Engagement

- Inform the local community about the decommissioning process and any potential impacts.
- Provide contact information for concerns or questions regarding the decommissioning activities.

7. Monitoring and Reporting

- Establish monitoring protocols to assess the effectiveness of decommissioning activities.
- Prepare a final report summarizing decommissioning activities, waste management, and site restoration.

Annex 11: RISK ASSESSMENT FOR WASH CONSTRUCTION SITES

Job Risk Assessment Form

Understanding the Risk Matrix

A risk matrix is a tool used to evaluate and prioritize risks based on their likelihood of occurrence and the potential impact on the project. It typically consists of two axes:

- Likelihood (Probability): The chance of the hazard occurring (e.g., Rare, Unlikely, Possible, Likely, Almost Certain).
- Severity (Consequence): The severity of the outcome if the hazard occurs (e.g., Insignificant, Minor, Moderate, Major, Catastrophic).

The risk matrix is usually presented in a grid format, with likelihood on one axis and impact on the other. Each cell in the matrix corresponds to a risk level rating High, Medium or Low.

Steps to determine Risk Level Ratings

- Identify Hazards: List all potential hazards related to the activity or project.
- Assess Likelihood: Determine how likely each hazard is to occur. Use descriptive categories (e.g., Rare, Unlikely, Possible, Likely, Almost Certain) to rate the likelihood.
- Assess Impact/ severity: Evaluate the potential consequences if the hazard were to occur. Use the impact categories (e.g., Insignificant, Minor, Moderate, Major, Catastrophic) to rate the impact.
- Locate the Corresponding Cell: Cross-reference the likelihood and impact ratings in the risk matrix to find the corresponding risk level (e.g., Low, Medium, High, Extreme).
- Document the Risk Level: Record the risk level rating for each identified hazard, along with any notes or justifications for the assessment.
- Implement Mitigation Measures: Based on the risk levels, prioritize which risks require immediate attention and develop appropriate mitigation measures to reduce their likelihood or impact.
- Regularly review the risk matrix as the project progresses and update it as new hazards are identified or as circumstances change.

Job Risk Assessment Form for WASH Rehabilitation

Project Name:
Location:
Date:
Assessor(s):

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1. Job Description

- Briefly describe the specific job or task being assessed.

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2. Job Risk Assessment Table

Risk Impact matrix:

SCALE OF SEVERITY	SCALE OF LIKELIHOOD			
	Very Likely	Possible	Unlikely	Highly Unlikely
Fatality	High	High	High	Medium
Major Injuries	High	High	Medium	Medium
Minor Injuries	High	Medium	Medium	Low
Negligible Injuries	Medium	Medium	Low	Low

Job Title	Activity	Hazard	Risk Level (Low/Medium/High)	Impact (Minor/Moderate/Major)	Mitigation Measures	Responsible Party	Review Date
Example: WASH Technician	Site Preparation	Slips, trips, falls	Medium	Moderate	Clear site of debris, use non-slip mats	Site Supervisor	

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3. Summary of Findings

- **Overall Risk Level:** (Low/Medium/High)
- **Key Risks Identified:**
- **Immediate Actions Required:**

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4. Sign-Off

- **Assessor Name:**
- **Signature:**
- **Date:**