

**NATIONAL SOCIAL SAFETY-NETS PROGRAM-SCALE UP**  
**Environmental and Social Management Plan (ESMP)**

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**Prepared by**

***National Social Safety-net Project Scale-Up (NASSP-SU)***

## Table of Contents

List of tables.....	iv
List of figures.....	iv
Acronyms.....	v
Executive Summary.....	vii
Chapter One: Introduction.....	10
1.1 Background.....	10
1.2 Project activities.....	<b>Error! Bookmark not defined.</b>
1.3 Rationale for preparing an Environmental and Social Management Plan.....	<b>Error! Bookmark not defined.</b>
1.4 Objectives of the ESMP.....	<b>Error! Bookmark not defined.</b>
Chapter Two: Policy, Legal and Institutional Framework.....	12
2.1 Introduction.....	12
2.2 Federal Policy, Legal and Institutional Framework.....	12
2.2.1 National Policy on Environment (Revised 2016).....	12
2.3 State Legislation on Environment.....	14
2.3.1 State Waste Management Authorities.....	15
2.4 Policy, Regulatory and Institutional Framework on Social Protection, Gender and Child Protection.....	15
2.4.1 Social Protection Policy.....	15
2.4.2 National Gender Policy (2007).....	17
2.4.3 Child Rights Act (2003).....	<b>Error! Bookmark not defined.</b>
2.5 Policy, Regulatory and Institutional Framework on Occupational Health and Safety.....	19
2.5.1 Labor Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004.....	19
2.5.2 Worker’s Compensation Act (2010).....	19
2.5.3 Federal Ministry of Labor & Employment.....	19
2.7 World Bank Environmental and Social Framework.....	22
2.7.1 Environmental and Social Standards (ESS).....	22
2.7.2 The World Bank Environment, Health and Safety Guidelines (EHSG).....	25
2.8 International guidelines and conventions.....	25
Chapter Three: Project Description.....	27
3.1 Background.....	27
3.2 Project components.....	27
3.3 Targeting approach.....	29
Chapter Four: Description of Project Environment.....	2
4.1 Location and Extent of Nigeria.....	2
4.2. Environmental and Social Baseline Conditions.....	3
4.2.1 The Physical Environment.....	3
4.2.2 Climate and Meteorology.....	3
4.2.3 Geology, Landform, and Soils.....	3

4.2.4 Drainage and Hydrology .....	4
4.2.5 Surface and Groundwater Quality.....	6
4.2.6 Vegetation .....	6
4.3 Waste Management in Nigeria .....	6
4.3.1 E-Waste .....	7
4.3.2 E-Waste Impact.....	7
4.3 Socio-Economic Environment .....	8
4.3.1 Population and Urbanization.....	8
4.3.2 Nigerian Economy and Poverty Profile .....	8
4.3.4 Gender and GBV.....	10
4.3.5 Other Vulnerable Groups.....	<b>Error! Bookmark not defined.</b>
<b>Chapter Five: Potential Environmental and Social Risks &amp; Impacts and Mitigation</b>	
5.1 Introduction .....	13
5.2 Potential Environmental and Social Impacts/Risks .....	13
5.2.1 Potential Positive Impacts.....	13
5.2.2 Potential Negative Impacts .....	14
5.3 Labour Influx, GBV Risks and Management Mechanisms .....	15
5.3.1 Labour Influx Risks.....	15
5.3.2 Gender Based Violence (GBV) Risks .....	15
5.3.2.1 Measures/Actions to be taken.....	15
Chapter Six: Grievance Redress Mechanism.....	16
6.1 Description of the GRM .....	16
Chapter 7 – Environmental and Social Management Plan.....	1
7.1 Introduction .....	1
7.2 Roles and Responsibilities in implementing the ESMP .....	1
7.3 ESMP Matrix .....	3
7.4 Environmental and Social Monitoring .....	8
7.5 Institutional Strengthening & Capacity Building .....	9
7.6 Environmental and Social Auditing .....	10
7.7 Disclosure of ESMP .....	10
7.8 ESMP Implementation Budget .....	11
Chapter Eight: Stakeholder Consultation and Information Disclosure .....	12
8.1 Stakeholder Consultation .....	12
8.2.1 Introduction to Consultations Held .....	12
8.2.3 Stakeholder Identification and Analysis .....	12
8.2.4 Mode of Consultation with Community.....	14
8.2.5 Outcome and Discussions from Stakeholder Consultation.....	17
Annexures: Technical Annexes to support the ESMP Implementation.....	20
Annex 1: Labour Management Procedures .....	20
Annex 1.1: Sample Codes of Conduct.....	50

Annex 1.2: Sample Occupational Health and Safety Training Plan .....	55
Annex 2: Generic E-Waste Management Plan for NASSP-SU .....	55
Annex 3: Guidance for NASSP-SU Implementing Agencies to Plan and Respond to COVID-19 .....	60
Annex 4: Environmental and Social Management Plan - Terms of Reference .....	61

#### List of tables

Table 1: Relevant Federal/State Policies, Legislations, Regulations & Guidelines .....	13
Table 2: Application of the ESF Standards to NASSP-SU .....	23
Table 3: Country key specification.....	2
Table 4: Productivity Potential of Nigerian Soils .....	4
Table 5: Summary of Water Surface Area of Lakes, Reservoirs and Major Rivers in Nigeria	5
Table 6: Nigeria’s Geopolitical Zones and States Distribution .....	8
Table 7: GRM Procedure .....	<b>Error! Bookmark not defined.</b>
Table 8: Roles and Responsibilities .....	1
Table 9: Environmental and Social Management Plan per state .....	4
Table 10: Capacity Building Plan for the 36 participating states and FCT.....	9
Table 11: ESMP Related Consultancy Requirements .....	<b>Error! Bookmark not defined.</b>
Table 12: ESMP Disclosure .....	10
Table 13: ESMP Budget.....	11
Table 14: Summary of Outcome .....	17
Table 15: Summary of the Outcome of Training and Consultations State Teams.....	17
Table 16: Summary of the Outcome of Consultations with Community Members.....	18

#### List of figures

Figure 1: Institutional Arrangements for NASSP-SU.....	22
Figure 2: Map of Nigeria showing the 36 states and the FCT .....	2
Figure 3: Vulnerability Framework (Turner et al. 2003).....	<b>Error! Bookmark not defined.</b>

## Acronyms

API	Application Programming Interface
CBN	Central Bank of Nigeria
CBOs	Community-based organizations
CBT	Community Based Targeting
CCT	Conditional Cash Transfer
CDA	Community Development Association
CDR	Call Detail Records
CEDAW	Convention on the Elimination of All Forms of Discrimination Against women
CT	Cash Transfer
E&S	Environment and Social
EHS	Environmental Health and Safety
EHSG	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESR-CT	Economic Shock Responsive Cash Transfer
ESS	Environmental and Social Standards
FAO	Food and Agriculture Organization
FEPA	Federal Environmental Protection Agency
FGD	Focal Group Discussion
FMEnv	Federal Ministry of Environment
FMHA & PR	Federal Ministry of Humanitarian Affairs and Poverty Reduction
GBV	Gender Based Violence
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
GROs	Grievance Redress Officers
GRVs	Grievance Redress Volunteers
IDA	International Development Association
IDPs	Internally Displaced Persons
ITCZ	Inter-tropical Convergence Zone
ITD	Inter-tropical Discontinuity
KYC	Know Your Customer
LFN	Laws of the Federation of Nigeria
LGA	Local Government Area
LMP	Labour Management Procedure
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MFBNP	Ministries of Finance, Budget, and National Planning
MIS	Management Information System
NASSCO	National Social Safety-Net Coordinating Office
NASSP SU	National Social Safety-Net Program- Scale Up
NASSP	National Social Safety-Net Program
NBR	National Beneficiary Register
NCDC	Nigeria Centre for Disease Control
NCTO	National Cash Transfer Office
NDHS	Nigeria Demographic and Health Survey
NESREA	National Environmental Standards and Regulations Enforcement Agency
NLSS	Nigerian Living Standard Survey
NPHCDA	National Primary Health Care Development Agency

NPM	National Program Manager
NSC	National Steering Committee
NSPP	National Social Protection Policy
NSR	National Social Register
OHS	Occupational Health and Safety
PDO	Project Development Objective
PIM	Project Implementation Manual
PMT	Proxy Mean Test
PMU	Project Management Unit
PSP	Payment Service Provider
PWD	Persons with Disability
R-CT	Regular Cash transfer
RRR	Rapid Response Register
SCTU	State Cash Transfer Unit
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SMS	Short Message Service
SOCU	State Operations Coordinating Office
SSC	State Steering Committee
UNDP	United Nations Development Programme
USSD	Unstructured Supplementary Service Data

## Executive Summary

The Government of Nigeria (GoN) through the Federal Ministries of Finance, Budget and National Planning (FMFBNP); and Humanitarian Affairs and Poverty Reduction (FMHA&PR) is scaling up the National Social Safety Net Program (P151488) to provide cash transfers support to the existing and new poor and vulnerable populations to mitigate the short term impact of the current and future shocks including pandemics, surge in inflation and removal of petroleum and motor spirit (PMS) subsidies (fuel subsidies). The new project, NASSP Scale Up (NASSP SU) will complement the government plan by providing financial resources and technical support for the delivery of temporary cash transfer support to the population affected by shocks, to protect the livelihoods of the existing chronically poor households as well as strengthening the shock responsive national social protection system.

**The Project Development Objective (PDO)** is to expand coverage of shock responsive safety net support among the poor and vulnerable and strengthen the national safety net delivery system. The project builds on the NASSP to provide strengthened social assistance support to Nigerian citizens and will support the following components:

**Component 1. Economic Shock Responsive Cash Transfer (ESR-CT):** Component 1 will provide temporary cash transfer to eligible beneficiaries in response to the current and future social and economic shocks.

- *Subcomponent 1.1. Rural ESR-CT to eligible beneficiaries in the NSR*
- *Subcomponent 1.2. Urban ESR-CT to eligible beneficiaries through the expansion of the Rapid Response Registry (RRR).*

### **Component 2. Extended Regular Cash Transfer (ER-CT) for the poor and the vulnerable**

### **Component 3. Delivery System Strengthening and Program management.**

- *Subcomponent 3.1. Expansion and strengthening of the safety nets delivery systems through increased integration and the use of digital technologies*
- *Subcomponent 3.2. Project management support*

The primary beneficiaries of the project will be poor and vulnerable households identified in the National Social Register. In addition to cash transfer beneficiaries, the project will improve the delivery systems for social assistance programs in Nigeria – both current and future. The Project is expected to positively impact the identified population as it will critically address the economic shocks created by pandemics and inflation rates in Nigeria.

The Project will not finance any rehabilitation or construction of infrastructure or other actions that will have an impact on the environment. However, project activities include physical and digital enrollment of beneficiaries, and cash-out processes that may involve interaction with Financial Service Providers (FSPs). Although payments to beneficiaries will be electronic, and directly deposited to their transactional accounts, in areas with low coverage of financial access points, the project will engage FSPs to provide the service of roaming access points on an ad-hoc basis. This measure will remove the risk of potential security issues related to cash payments.

Since the beneficiaries are vulnerable, they may be exposed to several environment and social risks such as potential transmission of contagious diseases among themselves during stakeholder engagement activities, especially if the crowds are not properly managed. Potential social risks include risks of social exclusion of untargeted vulnerable groups such as persons with disabilities, persons living in slum communities, internally displaced persons (IDPs) living in camps located in urban areas, people that may

be excluded due to incorrect capture in the RRR as a result of insufficient effort to reach them, or issues with network connectivity and bank accounts, people unable to register due to lack of phones; complaints and grievances due to selection process and service delivery; project induced gender-based violence (GBV) risks, including sexual exploitation and abuse/sexual harassment (SEA/SH) risks; potential security issues related to cash payment. Additional issues on e-wastes (although minor) from the likely procurement of computers and accessories for program management as well as for system development activities of the program especially at the National and State levels. Thus, an Environmental and Social Management Plan (ESMP) is required to guide NASSP SU in ensuring the project implementation is in line with the Nigerian Environmental Protection laws and the World Bank Environmental and Social Framework (ESF), in a bid to avoid negative environmental and social impacts, reduce or mitigate them to acceptable levels.

The methodology adopted for the preparation of this ESMP involved the following stepwise approaches:

- Desktop review of previously prepared literature, documents, and reports, including the Project Appraisal Document (PAD), Project Implementation Manual (PIM), and other relevant documents.
- Identification of project stakeholders.
- Environmental and Social Baseline Assessment
- Identification of potential adverse environmental and social risks and impacts of proposed intervention
- Consultations with Stakeholders
- Reporting

### **Potential Impacts and Mitigation**

#### **Potential Positive Impacts**

Some of the beneficial impacts associated with the project are stated below.

- The Project is expected to positively impact the identified population as it will critically address the economic shocks created by pandemics and inflation rates in Nigeria.
- The project will also provide short-term cash transfers to poor and vulnerable urban and rural populations in response to the current economic shocks while protecting the livelihoods of targeted chronically poor households.
- The Project will support the ongoing social safety net program and expand its reach to urban communities impacted by the economic shocks due to pandemics and inflation in Nigeria.
- The project will utilize a communication strategy to enable adequate capturing in the RRR for the urban population and the enumeration system in urban communities, thereby reducing issues of potential exclusion in cash transfer programs.
- The Project will strengthen the payment system to improve the financial and economic inclusion of the beneficiaries and will ensure gender-sensitive approaches to ensure a socially inclusive payment system.

#### **Potential Negative Impacts**

There are potential negative impacts that may be triggered because of the intervention which may include issues of occupational health and safety risks, road traffic accidents, physical violence and attack on field workers, SEA/SH risks, security risks, complaints and grievances, social exclusion of untargeted vulnerable groups, e-waste management issues. Mitigation measures include preparation and implementation of the e-waste management plan, community health & safety plan, possible epidemic/pandemic mitigation (Annex 3) and recommendations from the Gender and Social Inclusion Manual, including the implementation of a Sexual Exploitation and Abuse/Sexual Harassment Action

Plan; continuous implementation of the GRM, use of Third-Party Monitoring (TPM) to monitor project delivery to the beneficiaries, other stakeholders, CSOs; and implementation of communication strategy for the Project. NASSP SU will continue to rely and improve on these systems to ensure compliance with environmental and social risk management.

### **Grievance Redress Mechanism**

The main objective of a Grievance Redress Mechanism (GRM) is to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. NASSP already has a fully developed and functional GRM system, guided by an approved GRM manual. Under the NASSP, 74 State GRM Managers and 774 Local Government (LG) grievance redress officers (GROs) were recruited and trained across the 37 States and FCT. In addition, community level grievance redress volunteers (GRVs) with one male and one female were appointed in all the communities. The Project will adopt the GRM established in the NASSP including the Toll-Free Call Sorting Centre. A comprehensive GRM Manual has been reviewed and updated to align with the requirements of the NASSP-US project.

This section provides an identification of potential impacts with corresponding mitigation measures and monitoring actors. The total cost for the implementation of the ESMP is embedded in the Project cost such as activities for communications, GRM, and SEA/SH measures. Other cost items such as capacity building are also provided.

### **Public Consultations**

Consultations were held with community members across the six geopolitical zones, Project Officers (Environmental, Social, GRM, Gender and Social Inclusion and Project Coordinators across the 36 participating states and the national team) from January 5<sup>th</sup> – June 30<sup>th</sup>, 2022. The engagements were platforms to extract useful information, questions, and concerns relevant to the project. Concerns raised included extension of the cash transfer programs to cover health insurance and support for them to maintain their livelihoods.

## Chapter One: Introduction

### 1.1 Background

The Government of Nigeria (GoN) through the Federal Ministries of Finance, Budget and National Planning (FMFBNP); and Humanitarian Affairs and Poverty Reduction (FMHA&PR) is scaling up the National Social Safety Net Program (P151488) to provide cash transfers support to the existing and new poor and vulnerable populations to mitigate the short term impact of the current and future shocks including pandemics, surge in inflation and removal of petroleum and motor spirit (PMS) subsidies (fuel subsidies). The new project, NASSP Scale Up (NASSP SU) will complement the government plan by providing financial resources and technical support for the delivery of temporary cash transfer support to the population affected by shocks, to protect the livelihoods of the existing chronically poor households as well as by strengthening the shock responsive national social protection system.

The Project Development Objective (PDO) is to expand coverage of shock responsive safety net support among the poor and vulnerable and strengthen the national safety net delivery system. The project builds on the NASSP to provide strengthened social assistance support to Nigerian citizens.

The funding of the project will be federally coordinated, but implementation will be decentralized across states and FCTs. At the federal level, the National Social Safety Net Coordinating Office (NASSCO) serves as an overall coordinating body for all social safety nets programs in Nigeria and operates and maintains the National Social Register (NSR). It coordinates across all federal and state-level management structures. The National Cash Transfer Office (NCTO) coordinates cash transfers for the programs at the federal level. The State Operations Coordinating Units (SOCUs) and State Cash Transfer Unit (SCTUs) serve similar functions at the state level in each of the 36 states and the FCTs. The Local Government Areas (LGAs), led by the Local Government Desk Officers (LGDO), are responsible for on-the-ground implementation of the programs achieving the project results.

The project builds on the NASSP to provide strengthened social assistance support to Nigerian citizens and will support the following components:

**Component 1. Economic Shock Responsive Cash Transfer (ESR-CT). US\$476 million; This component** will provide temporary cash transfer to eligible beneficiaries in response to the current economic shocks affecting the country. The component has two subcomponents: i) *Subcomponent 1.1. Rural ESR-CT to eligible beneficiaries in the NSR*, ii) *Subcomponent 1.2. Urban ESR-CT to eligible beneficiaries through the expansion of the RRR.*

**COMPONENT 2. Extended Regular Cash Transfer (ER-CT) for the poor and the vulnerable. US\$ 294 million:** This component will continue to provide social assistance to the poor and vulnerable under NASSP by extending the duration of the transfers to the same households and, as feasible, combining it with a package of support services to improve their livelihood. The beneficiaries under this component will be the current beneficiaries of the regular-CT program under NASSP.

**Component 3. Delivery System Strengthening and Program management. US\$ 30 million.** Component 3 will expand and strengthen the social assistance/safety nets delivery systems through increased integration and use of digital technologies at various stages of the delivery chain and provide project management

support. The Component will support two sub-components: i) *Subcomponent 3.1. Expansion and strengthening of the safety nets delivery systems through increased integration and the use of digital technologies*, ii) *Subcomponent 3.2. Project management support*.

In addition to the three components discussed above, the project will also support: a) citizen engagement and social accountability, b) gender and social inclusion, and c) climate co-benefit. The primary beneficiaries of the project will be the cash transfer beneficiaries. In addition to cash transfer beneficiaries, the project will improve the delivery systems for social assistance programs – both current and future.

## 1.2 Project activities

The NASSP-SU will finance activities geared towards improvement of the social safety net landscape in Nigeria which will include the use of National Identification Number (NIN) and physical and digital enrollment of beneficiaries, and cash-out process that may involve interaction with Payment Service Providers (PSPs). Although payments to beneficiaries will be electronic, and directly deposited to their transactional accounts, in areas with low coverage of financial access points, the project will engage payment service providers to provide the service of roaming access points on an ad hoc basis.

## 1.3 Rationale for preparing an Environmental and Social Management Plan

Albeit the positive impacts associated with the proposed activities, several negative impacts can also be associated with the intervention, such as issues of social exclusion, GBV risks and security issues associated with cash transfer programs, e-waste management issues, labour requirements, etc. Hence, an Environmental and Social Management Plan (ESMP) is prepared and includes a set of mitigation measures, monitoring, and institutional actions to be put in place to prevent adverse environmental and social impacts, offset them, or reduce them to acceptable levels. It also includes the measures required to implement these actions, addressing the adequacy of the monitoring and institutional arrangements.

## 1.4 Objectives of the ESMP

The Environmental and Social Management Plan (ESMP) is designed to ensure that all potential negative environmental and social impacts arising from project implementation are systematically identified, effectively mitigated, minimized, or avoided, while also maximizing positive outcomes wherever feasible. The ESMP provides a structured approach for managing environmental and social risks throughout every phase of the project, including planning, design, construction, operation, and, where applicable, decommissioning.

The specific objectives of the ESMP are to:

- outline mitigation measures against the possible adverse effects in the implementation of the project.
- enhance positive aspects brought about by the project.
- ensure that the program will comply with relevant environmental and social standards, environmental legislation of Nigeria and other requirements throughout the project implementation cycle.
- identify roles and responsibilities and the cost involved.
- propose mechanisms for monitoring compliance.
- provide adequate feedback mechanisms for the different stakeholders throughout the project activity; and

- establish proven mechanisms to correct/adjust the findings resulting from monitoring activities and to include the input received throughout the project activity.

## Chapter Two: Policy, Legal and Institutional Framework

### 2.1 Introduction

This section presents the different laws and policies that are applicable to the operationalizing of this project; the National Laws & Policies, and World Bank Environmental and Social Framework (ESF).

### 2.2 Federal Policy, Legal and Institutional Framework

#### 2.2.1 National Policy on Environment (Revised 2016)

The National Policy on the Environment aims to achieve sustainable development in Nigeria. The policy identifies key sectors requiring integration of environmental concerns and sustainability with development and presents their specific guidelines, and to:

- Securing quality of environment adequate for good health and well-being.
- Promoting sustainable use of natural resources and the restoration and maintenance of the biological diversity of ecosystems.
- Promoting an understanding of the essential linkages between the environment, social and economic development issues.
- Encouraging individual and community participation in environmental improvement initiatives.
- Raising public awareness and engendering a national culture of environmental preservation; and Building partnership among all stakeholders, including government at all levels, international institutions and governments, non-governmental agencies and communities on environmental matters.

#### *2.2.2. The Federal Ministry of Environment*

The Ministry of Environment is the highest policy making body responsible for addressing environmental issues in Nigeria. The act establishing the Ministry places on it the responsibility of ensuring that all development and industry activities, operations and emissions are within limits prescribed in National Guidelines and Standards and comply with relevant regulations for environmental protection management in Nigeria as these may be released by the Ministry. To fulfill this mandate, several regulations/instruments are available (See section on National Legal Instruments); however, the main instruments in ensuring that environmental and social issues are mainstreamed into development projects is the Environmental Impact Assessment (EIA) Act No. 86 of 1992. With this Act, the FMEEnv prohibits public and private sectors from embarking on major projects or activities without due consideration, at an early stage, of environmental and social impacts that may arise from the project implementation. The act makes EIA mandatory for all new

major public or private sector projects, including large-scale agricultural projects, and prescribes the procedures for conducting and reporting EIA studies.

### 2.2.3 National Legal Instruments on the Environment

#### 2.2.3.1. Environmental Impact Assessment Act No. 86, 1992 (FMEnv)

This Act provides guidelines for activities of development projects for which EIA is mandatory in Nigeria. The Act also stipulates the minimum content of an EIA as well as a schedule of projects, which require mandatory EIAs. According to these guidelines:

- I. Category I projects will require a full Environmental Impact Assessment (EIA).
- II. Category II projects may require only a partial EIA, which will focus on mitigation and Environmental planning measures, unless the project is located near an environmentally sensitive area--in which case a full EIA is required.
- III. Category III projects are considered to have “essentially beneficial impacts” on the environment, for which the Federal Ministry of the Environment will prepare an Environmental Impact Statement.

#### 2.2.3.2. (b) National Environmental Standards and Regulations Enforcement Agency (NESREA)

NESREA was established by NESREA Act No 25 of 2007 as a parastatal of the FMEnv. NESREA is charged with the responsibility of enforcing all environmental laws, guidelines, policies, standards and regulations in Nigeria. The Agency also has the responsibility to enforce compliance with provisions of international agreements, protocols, conventions and treaties on the environment to which Nigeria is signatory. It has also amended its established Act of 2007 for a new NESREA Act 2018 to strengthen limiting gaps and enable effective operations.

Several national and international environmental guidelines are applicable to the operations of the NASSP-SU. This ESMP is prepared in alignment with relevant Federal Government policies, laws, regulations, guidelines, and applicable World Bank Environmental and Social Standards. The relevant Federal and State policy and regulatory instruments are summarized in Table 1 below.

**Table 1: Relevant Federal/State Policies, Legislations, Regulations & Guidelines**

S/N	Policy Instrument	Year	Provision
1.	National Policy on the Environment	1989 revised 1991	Describes the conceptual framework and strategies for achieving the overall goal of sustainable development in Nigeria.
Legal/Regulatory Instrument			
2.	Environmental Impact Assessment (EIA) Act No. 86	1992	Provide guidelines for activities of developmental projects for which EIA is mandatory in Nigeria. The Act also stipulates the minimum content of an EIA as well as a schedule of projects, which require mandatory EIAs.
3.	National Environmental (Electrical and Electronic sector) regulations,	2022	Provides measures for preventing and minimizing pollution from operations and ancillary activities of the electrical and electronic sector to the environment. The regulation applies to new and used electrical and electronic equipment (EEE) in Nigeria. The regulation is based on a lifecycle

S/N	Policy Instrument	Year	Provision
			<p>approach and shall cover all aspects of the electrical and electronic sector from cradle to grave. The principles of these regulations are anchored on the 5Rs – reduce, repair, reuse, recover and recycle.</p> <p>NESREA also developed a guide for importers of used EEE into Nigeria, which contains the guiding principles, requirements for importation of used EEE, and the description of items that are not allowed to be imported to Nigeria. According to this guide, all importers of used EEE in Nigeria are required to register and obtain “Import Clearance Certificate” with NESREA.</p>
4.	FEPA/FMEnv EIA Procedural Guidelines	1995	The Procedural Guidelines indicate the steps to be followed in the EIA process from project conception to commissioning to ensure that the project is implemented with maximum consideration for the environment.
5.	National Environmental (Sanitation and Wastes Control) Regulation S.I.28 of 2009.	2009	<p>This regulation applies to issues in environmental sanitation and all categories of waste including e-waste. It regulates the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution.</p> <p>It stipulates further the obligation of all manufacturers and importers of a various brands of products to comply with a product stewardship program and extended producers’ responsibility programme. E-waste becomes amenable to extended producers responsibility programme from January 2011.</p>
6.	National Guideline and Standard for Environmental Pollution Control	1991	Provide guidelines for management of pollution control measures
7.	S.I.15 National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations	1991	Regulates the legal framework for the effective control of the disposal of toxic and hazardous waste into any environment within the confines of Nigeria.

## 2.3 State Legislation on Environment

The State Ministries of Environment and Environmental Protection Agencies are created to back up the mandates of Federal Ministry of Environment at State levels towards the objective of protecting public health and safety, and to restore and enhance environmental quality and efficient implementation of environmental programs, Therefore, the state Ministries of Environment/EPA give direction to all issues concerning the environment, monitor and control pollution and the disposal of solid, gaseous and liquid wastes generated by various facilities in the states. Some of their functions include:

- Liaising with the Federal Ministry of Environment, to achieve a healthy or better management of the environment via development of the National Policy on Environment
- Co-operating with FMENV and other National Directorates/Agencies in the performance of environmental functions including environmental education/awareness to the citizenry
- Responsibility for monitoring waste management standards,
- Responsibility for general environmental matters in the State, and
- Monitoring the implementation of EIA studies and other environmental studies for all development projects in the State. Generally, State laws on the environment are still in the evolving stages. Specifically, for EA, the States relies on that of the Federal Government, the EIA Act 86.

### 2.3.1 State Waste Management Authorities

State waste management authorities have been established across several states in the Country with the following mandate:

- Collection of waste based on the assigned jurisdiction and coverage
- Disposal of waste and in some states recycling of waste
- Management of disposal sites, waste vehicles etc.
- Awareness and sensitization on waste management matters. The capacities of these agencies vary from one state to the other.

## 2.4 Policy, Regulatory and Institutional Framework on Social Protection, Gender and Child Protection

### 2.4.1 Social Protection Policy

The Federal Government of Nigeria recognizes the increasing relevance of social protection in engendering citizens' rights to a life of dignity and promoting human and economic development.

During the last decade, among developing countries, *social protection emerged as a viable policy framework employed globally to address poverty, social and economic vulnerabilities, inequality and exclusion, and other threats to sustainable development.* Recognizing that economic growth alone is insufficient to bring about the change needed in the country, the Government sought to adopt a balanced framework that promotes inclusive growth, equality and security as well as ensure a life of dignity.

The National Social Protection Policy (NSPP) is formulated in the context of the Nigeria Vision 20:2020. The key aspirations of this development framework are:

- a. optimizing human and natural resources to achieve rapid economic growth; and
- b. Translating that growth into equitable social development for all citizens with improved living standards.
- c. This Policy considers social protection goals as congruent with national development aspirations whereby expenditures on social protection are necessary investments in people.
- d. Accordingly, the Policy provides the framework not only to understand the vulnerabilities of the poor, but also as a measure to mobilize the assets and capabilities of individuals, households and communities for a sustainable human development.

Social Protection is defined as a mix of policies and programmes designed for individuals and households throughout the life cycle to prevent and reduce poverty and socio-economic shocks by promoting and enhancing livelihoods and a life of dignity.

The overarching goal of this policy is to establish a gender-sensitive and age-appropriate framework to ensure a minimum social protection floor for all Nigerian citizens for a life of dignity. The policy aims at the attainment of the goal by providing guidelines for:

- a. establishing universally acceptable platform of social protection activities for all the stakeholders as well as coordination of same at all levels of government.
- b. effective resource mobilization, resource management, and sustainability
- c. awareness creation, advocacy and mobilization of support for social protection as a viable development framework

To achieve this goal, the specific objectives of the Policy are to:

- a. reduce poverty among the people who are vulnerable to being poor.
- b. empower the poor and people vulnerable to economic shocks.
- c. enhance human capital development to ensure a life of dignity.
- d. provide guiding principles for managing social protection projects and programmes.
- e. promote social cohesion, equality and inclusive growth.
- f. ensure citizens have access to basic social services and infrastructure; g. provide social welfare and improve food security and nutrition.
- g. ensure decent employment and sustainable livelihood.
- h. protect individuals and households from shocks that can make them fall into extreme poverty; and
- i. Promote synergy and coordination among all social protection intervention agencies.

The NSPP adopts a lifecycle approach. This approach has the following major features:

- a. All individuals pass through a life cycle with different stages of life, defined by age brackets as follows: 0-5, 6-14, 15-24, 25-64, 65 years and above.
- b. Social protection interventions are age-appropriate and recognize the need to arrest the build-up of risks and vulnerabilities throughout the life cycle. Therefore, the intervention systematically target all stages of life such that the socioeconomic situation in one phase does not transmit to the next phase and cumulative benefits are achieved across generations.
- c. Social protection interventions address multidimensional and crosscutting issues as well as temporary and structural deprivations, shocks and vulnerabilities; and
- d. The guiding principles for social protection include prohibition of discrimination and unfair treatment of citizens due to their age, sex and other classifications.

Social protection is a component of political economy. The NSPP has been developed within some established principles as follows:

**The Principle of Redistribution:** The Principle commits to the redistribution of resources to progressively reduce the gaps in inequality using important means of resource redistribution and provision of non-market services and opportunities to ensure social order and stability. In this direction, the Government shall reduce poverty through social transfers and provision of social support and services.

**The Principle of Universal Basic Needs:** This Principle states that all humans have universal prerequisites for successful and critical participation in social life, and that human needs are the universal preconditions for participation in social life. Government, therefore, affirms the right of every Nigerian to the satisfaction of their basic needs, especially in the areas of education, health, food security and employment.

**The Principle of Citizenship:** The Principle stipulates that the purpose of the state is for the good of the citizens. All citizens, without distinction of status or class or gender, should be offered a minimum standard of living in relation to an agreed range of services. Government shall, through its relevant agencies, carry out citizenship related activities to ensure effective delivery of services to the populace.

**The Principle of Human Rights:** Social and economic rights guarantee the right to life. Social protection rights are valued as much as other human rights. Accordingly, Government shall ensure implementation of the provisions of Chapter IV: Fundamental Rights of Nigerian Citizens as enshrined in sections 33-46 of the 1999 Constitution of the Federal Republic of Nigeria as amended.

**The Principle of Social Control:** The Principle emphasizes the important role of social control in maintaining social stability and cohesion which are necessary for the well-being of the individual and groups in each society. The government shall consciously use appropriate social protection instruments to discourage actions that could lead to social dislocation and problems.

**Principle of Social Inclusiveness:** Social inclusiveness demands that increasing provision be made for economic, social, political and cultural opportunities for citizens' participation in the normal activities of their society without stigma or discrimination. The government shall take necessary measures to widen access and increase participation.

#### 2.4.2 National Gender Policy (2021)

The National Gender Policy was developed in 2006 to provide strategic policy guidance for mainstreaming gender at all levels as well as address the inequalities that exist in the socioeconomic sphere. In tandem with emerging global trends, particularly as the global development agenda translated from the Millennium Development Goals to Sustainable Development Goals, a review of the National Gender Policy became expedient to address current challenges.

Since its inception, the policy statement and its directives have been bolstered through various regional and international agreements, to which Nigeria is a party; aimed towards gender justice, gender equality, women's empowerment, and social inclusion. The ERGP – the Nigeria Economic Recovery and Growth Plan and its recent review – the new Nigeria's National Economic Plan makes a national commitment to re-dressing long-term systemic discrimination against women, identifying and overcoming the limitations to the empowerment of women and men, and social inclusion issues; and ultimately creating a society that values gender balance and equity for ALL.

The Nigeria National Gender Policy 2021–2026 emphasizes the integration of gender equity concerns into social protection, humanitarian actions, legislation, and policies as a critical objective. This integration aims to ensure that gender equality and women's empowerment are mainstreamed effectively across all sectors of national development.

The policy mandates that gender equity considerations be embedded in social safety nets and social buffer programs to protect vulnerable groups, particularly women and girls, from socio-economic shocks and discrimination.

It calls for the inclusion of gender equity in complex humanitarian responses, recognizing the distinct needs of women, men, girls, boys, and other vulnerable groups during crises. This

ensures that humanitarian interventions are sensitive to gender-based vulnerabilities and promotes social inclusion.

The policy requires that all relevant laws and policies at national and sectoral levels incorporate gender equity principles. This includes aligning with international frameworks and affirmative action measures to address systemic barriers and promote equal access to resources, opportunities, and rights.

The policy advocates a shift from a gender-sensitive approach, which assumes equality, to a gender-aware approach that acknowledges existing barriers and inequalities. This shift is fundamental to transforming policymaking and implementation processes to be more inclusive and equitable.

Effective integration depends on the cooperative interaction of government, private sector, civil society, traditional and religious leaders, community-based organizations, and development partners to drive implementation and monitoring.

Beyond gender, the policy also stresses mainstreaming socially excluded groups such as persons with disabilities, the elderly, and the poor into social protection and development practices, ensuring no one is left behind.

In general, the policy positions the integration of gender equity into social protection, humanitarian actions, legislation, and policies as essential for building a just, inclusive society where the rights and needs of all genders and vulnerable groups are equitably addressed and upheld throughout national development processes

#### *2.4.2.1 Federal Ministry of Women Affairs*

The FMWA was established by Decree No. 30 of 1989. The broad mandate of the Ministry is to advise the government on gender and children's issues and issues affecting persons with disabilities and the older persons. The Ministry also initiates policy guidelines and leads the process of ensuring gender equality and mainstreaming at both the national and international levels.

#### *2.4.2.2 The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)*

Discourages the discrimination against women by any distinction, exclusion or restriction made based on sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

#### *2.4.3 Child Rights Act (2003)*

The act gives full protection to privacy, honor, reputation, health and prevention from indecent and inhuman treatment through sexual exploitation, drug abuse, child labor, torture, maltreatment and neglect to a Nigerian Child. It also declares that every child has a right to life, to be allowed to survive and develop. It also codifies the rights of children in Nigeria (a person below the age of 18 years), consolidates all laws relating to children into a single law and specifies the duties and obligations of government, parents and other authorities, organizations and bodies. More particularly, the Act gives full protection to privacy, honor, reputation, health and prevention from indecent and inhuman treatment through sexual exploitation, drug abuse, child labor, torture, maltreatment and neglect to a Nigerian Child.

## 2.5 Policy, Regulatory and Institutional Framework on Occupational Health and Safety

### 2.5.1 Labor Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004

The Act covers general provisions including:

- Protection of wages
- Contracts of employment and terms and conditions of employment
- Fair treatment and equal opportunities for project workers.
- Hours of work and overtime
- Employment of women
- Labor health matters
- Prohibition of forced labor
- Labor complaints

### 2.5.2 Worker's Compensation Act (2010)

The Act provides compensation to employees who suffer from occupational diseases or sustain injuries arising from accidents at workplace or in the course of employment. Payment of compensation (to the worker or to his dependents in case of death) by the employer is rooted in the accepted principle that the employer has a duty of care to protect the health, welfare and safety of workers at work.

### 2.5.3 Federal Ministry of Labor & Employment

The Nigeria Ministry of Labor and Employment is the country's designated authority for labor-related matters. The ministry has the authority and capacity to ensure appropriate labor management in the country. The Ministry is structured into six Zonal labor offices, nine departments consisting of six professional and three service departments. It operates 36 State Labor Offices and the FCT, 23 District Labor Offices, Labor Desk Office, Geneva, Switzerland. Recently nine (9) Labor Desk were approved for nine ministries, department and agencies.

## 2.6 Institutional Arrangement for the NASSP- SU

### 2.6.1 Federal-level Project Management, Coordination, and Implementation arrangements.

The NASSP-SU builds on the lessons from the NASSP flagship CT intervention which clearly demonstrated that the project was designed and funded at the federal level but had strong state level implementation structures. At the federal level, NASSCO and the NCTO manage and coordinate implementation of the NASSP-SU under the general oversight of the Permanent Secretary. While the actual implementation of the program will be the responsibility of states and LGAs, NASSCO and the NCTO will provide general oversight, quality assurance, technical support, supervision, M&E, resource management, and allocation for states.

The Project Implementation Manual (PIM) clearly delineates the roles and responsibilities of NASSCO and the NCTO implementation units and offices. Also, the roles and responsibilities of the SOCUs and SCTUs as well as LGA desk officers are spelt out. NASSCO is led by the NPMs-NASSCO, who coordinates targeting-related design and implementation and other associated system agenda including maintaining NSR, RRR, URB and programme related systems

strengthening work packets. It also coordinates cross-cutting issues related to the development of the delivery system, M&E, fiduciary management, gender and social inclusion, citizens engagement and social accountability, and environmental and social safeguard issues. NCTO is responsible for the implementation management and coordination of CT and related delivery system of the NASSP-SU. The NCTO is led by an NPMs-NCTO are fully responsible for the management and administration of the NCTO Unit and for the coordination of CT-related activities.

The institutional and coordination arrangements for NASSP-SU include:

i) Establishment of National and State level Steering Committee; (ii) the NASSCO with the NSR; (iii) the NCTO; (iv) State level coordination and implementation structures including: SOCUs and SCTUs established in all 36 states and FCT, Abuja; and (v) implementation offices in LGAs led by Local Government Desk Officers (LGDO). Reconfirming the institutional and coordination arrangements including the formation of a National Steering Committee (NSC) and signing of MoU with States will be a dated covenant to be achieved in three months after effectiveness.

**2.6.1.1 NASSCO coordinates targeting related design and implementation and other associated system agenda including maintaining NSR and RRR.** It also coordinates crossing cutting issues related to the development of Delivery System, M&E, Fiduciary Management, Gender and Social inclusion, Citizens Engagement and Social Accountability and Environment and Social Safeguard issues. NASSCO will be headed by NPMs-NASSCO, assigned by FMHAPA based on a TOR agreed with the World Bank. The NPMs-NASSCO- will report to the NC-NSIP who will in turn report to the Permanent Secretary (FMHAPA). The NPMs-NASSCO will be fully responsible for the management and coordination of NASSCO activities including NSR and RRR. The role of NASSCO to coordinate and implement important social system agenda including NSR and RRR is highly tasking and requires technical skills for developing a robust delivery system. To play this role, NASSCO is required to attract high level personnel from within and outside government. NASSCO will put in place high level IT infrastructure, systems, management and the technical specialists under it as cleared by World Bank.

**2.6.1.2 NCTO is responsible for the implementation management and coordination of Cash Transfer and related delivery system of NASSP-SU.** NCTO will be led by a qualified NPMs-NCTO who will be assigned by FMHAPA, and NPMs- NCTO will be fully responsible for the management and administration of the NCTO Unit and for the coordination of cash transfer-related activities. These include effective transfer of cash to beneficiaries and development of digitized payment delivery mechanism, annual work plans, financial management and budget, training plans, procurement plans, M&E, grievances, technical support to States, and engagement of stakeholders etc. The NCTO NPMs will be supported by team of officers on a full-time basis as well as short/long-term consultants as Technical Specialist who will provide necessary expertise around the relevant systems and technology for payments and reconciliation as needed. The TOR for the staff to be deployed to the unit will be reviewed and agreed with the World Bank.

### **2.6.1.3 National Steering Committee (NSC)**

The Federal-level Project Steering Committee is headed by the Minister of Finance (CME) and comprises of Ministers of the key sectoral ministries and heads of agencies (Ministry of Humanitarian Affairs, Labour and Employment, Education, Health, Women Affairs, Youth and Sports, Agriculture, Water Resources, Environment, etc), to provide oversight and policy guidance to the program. The committee is supported by NASSP-SU.

The Terms of Reference (ToR) for setting up the steering committee has been prepared by FMHAPA and cleared by the World Bank. The NSC provides an important strategic oversight for

the project, and it defines the future direction and sustainability of the program. This includes the broader social protection investments in relation to human capital development, Social Protection reform agenda and pro-poor initiatives. The National Coordinator – National Social Investment Programs (NC-NSIP) will serve as a secretariat for the NSC with the support from the NASSCO and NCTO National Program Managers (NPMs). The NSC will be expected to meet on semi-annual basis and will maintain periodic interface with the Governor’s Forum at the national level to further strengthen the engagement of States.

## **2.6.2 State-level project implementation and coordination arrangements.**

The SOCU and SCTU are established in all 36 states and FCT Abuja. The SOCUs and SCTUs in each of the 36 states and the FCT will serve similar functions, to that of NASSCO and NCTO, at the state level. NASSP-SU is a federally financed and coordinated program, but implementation will be decentralized to the state level and the FCT, except for the activities that require direct implementation responsibility of federal units.

### **2.6.2.1 State Operations Coordinating Unit (SOCU)**

SOCU is housed in the State Office for Budget and Planning. SOCU is responsible for establishing and managing the State Social Register (SSR). In the LGAs, desk offices will continue to implement community-based targeting, grievance redress mechanisms, and monitoring activities. States and LGAs will receive financial and technical support from NASSCO to carry out their responsibilities.

### **2.6.2.2 State Cash Transfer Unit (SCTU)**

The State Ministry housing SCTU will vary from State to State depending on the State’s institutional set-up, but likely locations include Ministries of Social Development and Women’s Affairs. The SCTU will coordinate monitoring and reporting on cash transfer payments at the LGAs in coordination with community facilitators; work with NCTO to enroll beneficiaries eligible for payment; and facilitate implementation of productive and economic inclusion activities, etc. States and LGAs will receive financial and technical support from NCTO to carry out their responsibilities.

### **2.6.2.1 State Steering Committee (SSC)**

At the state level, the Steering Committees is chaired by the Commissioner (or the equivalent) responsible for planning and Budget and Planning in the state, and comprise Commissioners and Permanent Secretaries of the key sectoral ministries and heads of agencies (Ministry of Finance, Education, Health, Women Affairs, Agriculture, Water Resources, etc.) to provide oversight and policy guidance to the program. The SSCs will provide important strategic oversight for the project at the state level. This committee will be supported by NASSP-SU.

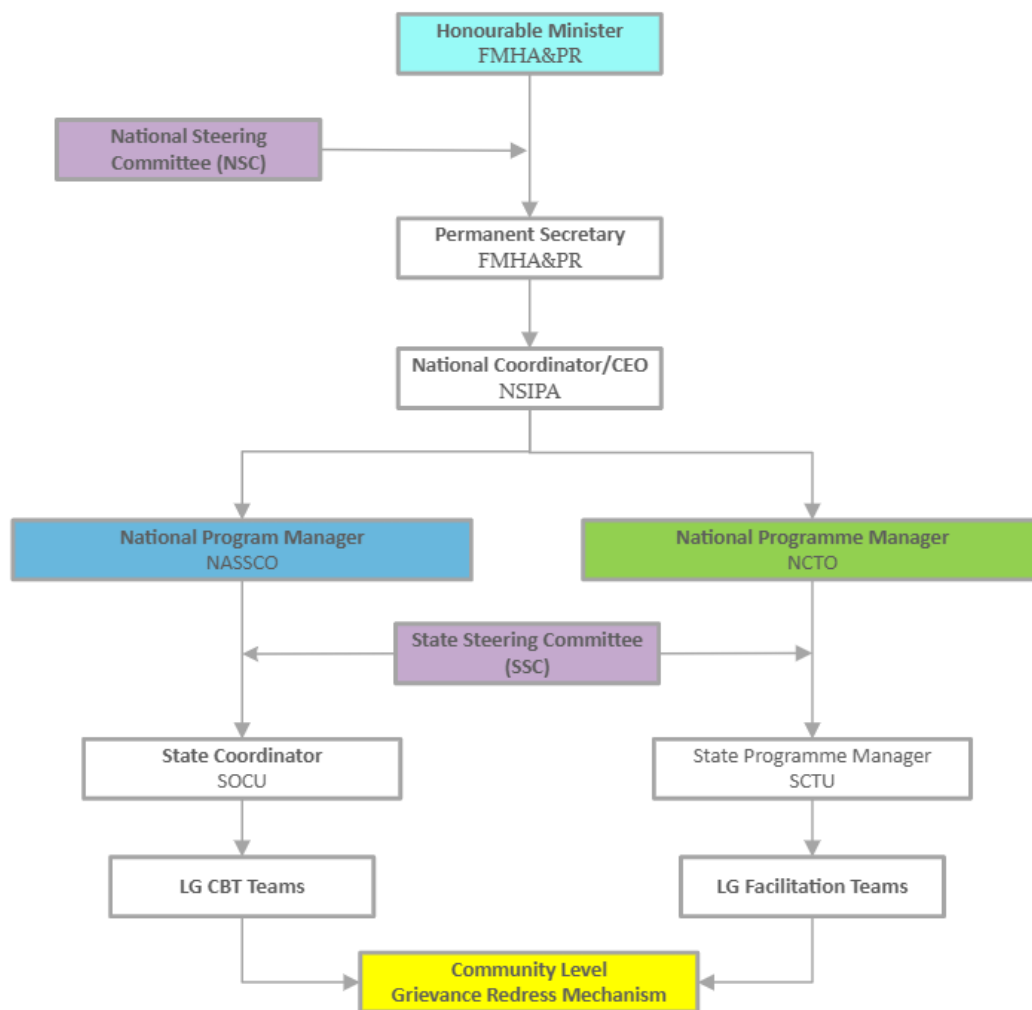


Figure 1: Institutional Arrangements for NASSP-SU

## 2.7 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework sets out the World Bank’s commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support this project, with the aim of ending extreme poverty and promoting shared prosperity. According to the ESF, the applicable Environmental and Social Standards (ESS) to the project has been discussed below.

### 2.7.1 Environmental and Social Standards (ESS)

The World Bank Environment and Social Standards enable the integration of environmental and social considerations into the development, planning and execution of the NASSP-SU. These standards are designed to: protect the environment and society from potential negative effects of projects, plans, programs and policies; reduce and manage the risks associated with

implementation of project activities; and assist in better decision-making to ensure sustainability of activities. The Bank’s environmental and social standards provide guidance to the World Bank on the process, scope, and extent of environmental and social assessment required for project evaluation.

The Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification and evaluation of social and environmental risks and impacts associated with projects supported by the Bank through Financing Investment Projects. These 10 standards include:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts.
- ESS2: Labor and Working Conditions
- ESS3: Resource Efficiency and Pollution Prevention and Management.
- ESS4: Community Health and Safety.
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- ESS8: Cultural Heritage.
- ESS9: Financial Intermediaries; and
- ESS10: Stakeholder Engagement and Disclosure of Information.

In addition to the above, the World Bank Group General Environment, Health and Safety Guidelines also apply to the project.

However, for the purposes of the project, the ESS applicable for this project are:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts.
- ESS2: Labor and Working Conditions
- ESS3: Resource Efficiency and Pollution Prevention and Management.
- ESS4: Community Health and Safety
- ESS10: Stakeholder Engagement and Disclosure of Information.

**The applicability of these standards for the project is discussed in table 2 below:**

**Table 2: Application of the ESF Standards to NASSP-SU**

<b>Applicable standard</b>	<b>Reason for application of the Standard to the Project</b>	<b>How it will be addressed by the Project</b>
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	The project activities under Component 1&2 will include delivery of Cash Transfers to vulnerable populations in the rural and urban areas. In the event of pandemics such as happened during COVID-19, the standards details actions to mitigate and reduce risks. The risks of e-waste may arise from the likely procurement of computers and accessories for	This Environmental Social Management Plan (ESMP) details how pandemics, e-waste and other environmental and social issues will be appropriately managed.

Applicable standard	Reason for application of the Standard to the Project	How it will be addressed by the Project
	<p>program management as well as for system development activities of the program, especially at the National and state levels.</p> <p>The Project also poses potential social risks including risks associated with social exclusion of untargeted vulnerable groups, complaints, and grievances due to selection process and service delivery; risk of elite capture, project induced GBV risks, including SEA/SH risks; issues on data protection; difficult access for the elderly, people with disabilities, and remote groups.</p>	
<p>ESS2: Labor and Working Conditions</p>	<p>The project will make use of various categories of workers, direct and contracted workers including payment service providers (PSPs) who may face unfavorable terms and conditions of employment, discrimination, forced labor, grievances and unsafe working conditions.</p>	<p>Labor Management Procedures (LMP) consistent with ESS2 and National Labor Laws for all categories of workers have been integrated into the ESMP in Annex 1. The LMP sets out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS.</p>
<p>ESS3: Resource Efficiency and Pollution Prevention and Management.</p>	<p>Component 3 will strengthen digital and information system and institutions, these activities may involve procurement of computers and accessories for program management as well as for system development activities of the program especially at the National and state levels.</p>	<p>This ESMP details how e-waste will be appropriately managed throughout project implementation. This is provided in Annex 2.</p>
<p>ESS4: Community Health and Safety</p>	<p>NASSP-SU management and its state affiliates, including members of community organizations, would be interacting with communities to inform them about the programme. This may expose both staff and community members to certain hazards; health, security, GBV (SEA/SH), etc.</p>	<p>The ESMP identified guidelines for addressing community health and safety risks. The ESMP also include measures to address the SEA/SH risks and risk of community exposure to insecurity, GBV (SEA/SH), social exclusion, etc. WHO standards in averting community spread of the disease and any national circulars/guidelines are provided in Annex 3.</p>

Applicable standard	Reason for application of the Standard to the Project	How it will be addressed by the Project
		A GBV Action plan has been developed and will be implemented.
ESS10: Stakeholder Engagement and Disclosure of Information.	There are different categories of stakeholders associated with the project with varying degrees of influence. These stakeholders will need to be identified, engaged effectively to improve environmental and social sustainability of the project, enhance acceptance, and make significant contribution to successful project design and implementation.	A Stakeholder Engagement Plan (SEP) has been prepared as a stand-alone document. In addition, stakeholder consultations were held during the preparation of this ESMP. The ESMP will be publicly disclosed informing of the project risk & impacts to stakeholders

## 2.7.2 The World Bank Environment, Health and Safety Guidelines (EHSg)

The EHSg are technical reference documents with general and industry-specific examples of GIIPs, as defined in ESS3. The EHSg contains the performance levels and measures that are normally acceptable to the World Bank and that are generally considered achievable in new facilities at reasonable costs by existing technology. The relevant guideline to this Project is the World Bank Group EHS Guidelines on Waste Management <https://www.ifc.org/wps/wcm/connect/456bbb17-b961-45b3-b0a7-c1bd1c7163e0/1-6%2BWaste%2BManagement.pdf?MOD=AJPERES&CVID=nPtwgEW>

Although the Project does not envisage large-scale e-waste issues, laptops, computers, and tablets (for enumeration of potential project beneficiaries) will be reused and disposed of in line with best practices. Detailed information on e-waste management procedure is provided in Annex 2.

## 2.8 International guidelines and conventions

Nigeria is a signatory to several international conventions and treaties that promote the maintenance of a viable environment and achieving sustainable development. The Federal Ministry of Environment is the Focal Point and Designated National Authority for the implementation of several of the international conventions. The ones relevant to the E-waste project are:

- Basel Convention on Transboundary Movement of Hazardous Waste and its Disposal, 1992 (Party, ratified in 1990)
- Ban Amendment (ratified in 2004. The Amendment has not yet entered into force)

- Bamako Convention on the Ban of the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa (1991) (Signatory).
- Framework Convention on Climate Change, 1992 (Party, ratified in 1994).
- Montreal Protocol on Substance that Deplete the Ozone Layer 1987 (Party, ratified 1991).
- The Stockholm Convention on Persistent Organic Pollutants (Party, ratified in 2004).

## Chapter Three: Project Description

### 3.1 Background

The NASSP-SU, a follow-on operation to the NASSP, will build on and scale up the existing delivery system to provide shock responsive safety nets and to extend regular social assistance to the poor and vulnerable. The project is designed to offer time-limited cash transfers in response to recent shocks (food price inflation) in rural as well as urban areas. The project will also extend the duration of support to the current beneficiaries of NASSP regular cash transfer program - yet to receive cycles of benefits.

This project is expected to meet urgent needs and mitigate shocks while building a shock responsive safety net system that can help adapt to future climate and other shocks. The project will contribute to households securing basic needs, diversifying livelihoods, and investing in human capital. The increased resilience will allow vulnerable households to avoid negative coping mechanisms that may have irreversible adverse impacts on human capital (for example, through reduced nutrition, schooling, and health care), including in response to climate and other shocks.

The Project Development Objective (PDO) is to expand coverage of shock responsive safety net support among the poor and vulnerable and strengthen the national safety net delivery system.

### 3.2 Project components

The project builds on the NASSP to provide strengthened social assistance support to Nigerian citizens and consists of the following components:

- Component 1: provides shock responsive time-limited cash transfers to poor and vulnerable households in rural and urban areas.
- Component 2: extends the duration of the regular cash transfers support to the poor and vulnerable households currently supported by the NASSP.
- Component 3: supports the strengthening of the delivery system to support components 1 and 2 together with broad improvements to the safety net delivery system. Component 3 also provides support to program management, monitoring and evaluation.

#### **Component 1: Economic Shock Responsive Cash Transfer (ESR-CT). US\$600 million.**

Component 1 will provide time-limited cash transfers to eligible beneficiaries in response to the current food price shocks affecting the country. The year-on-year increase in inflation, due largely to conflict in food producing regions of the country (often exacerbated by climate change) and other social and economic shocks induced supply chain disruptions, pushed millions of Nigerians into poverty and reduced the welfare of many more. This increase in prices affects residents in both rural and urban areas but the impacts are disproportionately higher for the poor and vulnerable, and disproportionately higher in urban areas. This component will finance the cash transfers going directly to 5 million beneficiary households in the urban areas, and 3.2 million beneficiary households in rural areas.

*Subcomponent 1.1. Rural ESR-CT to eligible beneficiaries in the rural ward covered by the NSR (US\$235 million):* This subcomponent will provide temporary cash transfer of ₦25,000 (US\$15.80 equivalent) per month for a period of 6 months to provide relief against the economic shocks to 3.2 million eligible households in the rural areas. The NSR, developed and expanded through the

NASSP, will be leveraged to target the beneficiaries, and promptly provide cash transfers to the poor and vulnerable households in rural wards.

*Subcomponent 1.2. Urban ESR-CT to eligible beneficiaries in urban wards covered by the NSR and RRR, and through the expansion of the RRR (US\$365 million):* This subcomponent will provide temporary cash transfer of ₦25,000 (US\$15.1 equivalent) per month for a period of 6 months to provide relief against the economic shocks to eligible urban beneficiaries. A total of 5.0 million currently unsupported beneficiary households will be supported in urban wards under the subcomponent using both the NSR and the Rapid Response Register.

### **Component 2. Extended Regular Cash Transfer (ER-CT) for the poor and the vulnerable (US\$147 million)**

Component 2 will continue the social assistance provided to the poor and vulnerable under NASSP by extending the duration of the transfers to the existing beneficiaries and providing them with an exit grant from the program. The beneficiaries under this component will be the current beneficiaries of the regular-CT program under NASSP. Currently, there are about 2 million households supported by the regular-CT program under NASSP.

For the chronically poor and vulnerable households selected for this program, a sustained cash transfer program is necessary to help them out of poverty and vulnerability. The poor and vulnerable households are more likely to experience shocks, including climate-induced, that typically face the brunt of those shocks as well.

This component seeks to ensure that the beneficiaries of the regular-CT program under NASSP continue to receive regular cash transfer for at least two years across NASSP and this project.<sup>[2]</sup> Under this component, current regular-CT beneficiaries of NASSP, 94 percent of whom are females, will continue to receive a transfer of ₦25000 (US\$15.80) per month so that the total duration of support they received under the NASSP and this project will be at least two years. When beneficiaries receive support for two years (or more), from either NASSP and/or in combination with NASSP-SU, they will stop receiving regular-CT and will instead receive a one-time cash grant<sup>1</sup> signifying their exit from the program.

### **Component 3. Delivery System Strengthening and Program management (US\$53 million)**

Component 3 will expand and strengthen the safety nets delivery systems through increased integration and use of digital technologies at various stages of the delivery chain to deliver the cash transfers under components 1 and 2 as well as future safety nets programs. This component also provides project management and M&E support.

#### *Subcomponent 3.1. Expansion and strengthening of the safety nets delivery systems through increased integration and the use of digital technologies*

An effective and efficient delivery system is crucial for the success of activities proposed under components 1 and 2 as well as, more generally, for other safety nets programs. This subcomponent will support the following activities:

- Expansion of the RRR: Under the NASSP, the RRR platform has been launched in all 2,652 urban wards. This platform will be further utilized for registration in eligible urban wards where RRR registration remains low.

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<sup>1</sup> The exact amount of the cash grant will be based on the number of beneficiaries and the duration of support received by them by June 2022 through NASSP and the available financing under this component. The exact amount will be calculated and be included in the project operations manual.

- Support enrollment and registration of beneficiaries for components 1 and 2.
- Strengthening the payment delivery mechanism. The project will build on and extend the work done under NASSP, using delivery mechanisms that leverage PSPs, monetary frameworks and digital financial solutions as put forward by the financial sector regulator, and as provided by the financial sector stakeholders.
- Strengthening targeting of social assistance.
- Improve usage and integration of data and monitoring information systems (MIS).
- Institutional strengthening
- Process evaluation. The objective of the impact evaluations will be to generate knowledge to inform ways in which the targeting and delivery systems can be further strengthened.
- Cross-cutting issues. The project will also support the mainstreaming of cross cutting issues into the system strengthening. Cross-cutting areas include gender and social inclusion, citizens' engagement and social accountability, GRM, Environment and Social Framework, and fiduciary management. Citizens' engagement and GRM will exploit the usage and deployment of digital / information technology for increased efficacy.

### ***Subcomponent 3.2. Project management support***

This component will also support the day-to-day program management to ensure smooth implementation of the project activities. In this regard, the existing Project Management Units (PMU), NASSCO and the National Cash Transfer Office (NCTO) will be further strengthened and including further clarifying roles and responsibilities and effective utilization of human resources and logistics.

## **3.3 Targeting approach**

The NASSP – SU project is targeted at the 1,652 Urban and 5,620 Rural wards across the entire 774 Local Government Areas in 36 States and the Federal Capital Territory, making a total of 7,272 wards. These eligible wards were determined according to the poverty map of National Living Standard Survey (NLSS) 2018/2019. The eligibility of the wards was based on the ranking criteria of the survey, adopting the bottom-top approach. The ranking criteria utilized the bottom 8 deciles of both the rural and urban wards out of the 10 deciles. The bottom 8 deciles poorest wards considered an inclusive criterion to cater for more poor and vulnerable households that must have been affected by the economic shock of the COVID-19 pandemic.

Based on the project design and resources allocation, the NASSP-SU targeted 5,000,000 households in Urban areas and 3.2 million households in the rural ward as eligible using the poverty map. To ensure a fair distribution of the beneficiaries according to the states and their entire local government areas, the poverty coefficient of the states as stipulated in the NLSS were used while triangulating the year-on-year inflation figures in the respective states to determine the beneficiaries' quotas in the states and LGAs. Furthermore, the Regular Cash Transfer (R-CT) in the NASSP will also be sustained to cater for the 2 million households at any point in time by utilizing the NASSP exit strategy and onboarding the new households updated in the NSR.

Having established the designated wards and the state and LGA quota allocation, the targeted households will be selected from the National Social Register (NSR) and the Rapid Response Register (RRR) according to their respective State and LGA quotas. Additionally, the households in targeted wards in the NSR or the RRR will be eligible to fill the quota by stacking method from the poorest ward until the respective LGA quota have been exhausted. Where there are more households in the last stacked wards more than the LGA quota, a special consideration will be given to the female headed households and the household welfare index as determined in the

NSR or the RRR. In cases where the number of households are less than the LGA quota, the households targeting mechanism in the NSR and the RRR as stipulated in the PIM will be used to make up the quotas in the affected wards.

These methods of household's targeting mechanism have been full proof in the NASSP intervention and Government Shock Responsive Mechanism, addressing the exclusion and inclusion errors to the barest minimum.

### **PROPOSED STEP BY STEP WORKFLOW NASSP-SU-NIMC ENROLLMENT and VERIFICATION SCHEMA**

SN	WORKFLOW DESCRIPTION	TIMELINE	RESPONSIBILITY	REMARK
1	The Implementation of the NASSCO – NIMC collaboration begins with the signing of the MoU for both parties detailing terms of engagements and timeframe for tasks, data and other resources exchange.	T0	NASSCO - NIMC	
2	The Data from the NSR is filtered according to the HHs and its members that have no NIN/BVN. Other details for implementation will also commence such as system integration, M&E setup and desk reviews.	T0 + 7days	NASSCO/NIMC	
3	NIN/BVN Enrollment Training of MIS Officers and Enumerators at FCT and across the states.	T0+21days	NASSCO/NIMC/MNO	
4	Joint sensitization and awareness campaign in readiness for the deployment exercise.	T0+27days	SOCU/SCTU	
5	Joint field deployment for the exercise by all actors.	T0+30days	SOCU/SCTU/MNOs/FSP	This section involves community activity
6	HH members without NIN/BVN will be enrolled by MNOs/FSPs assisted by SOCU/SCTU	T0+44days	SOCU/SCTU	This section would involve community and household-level activities for enrolment.
7	The HHs members that falls under the condition of "YES"	T0+44days	SOCU/SCTU	

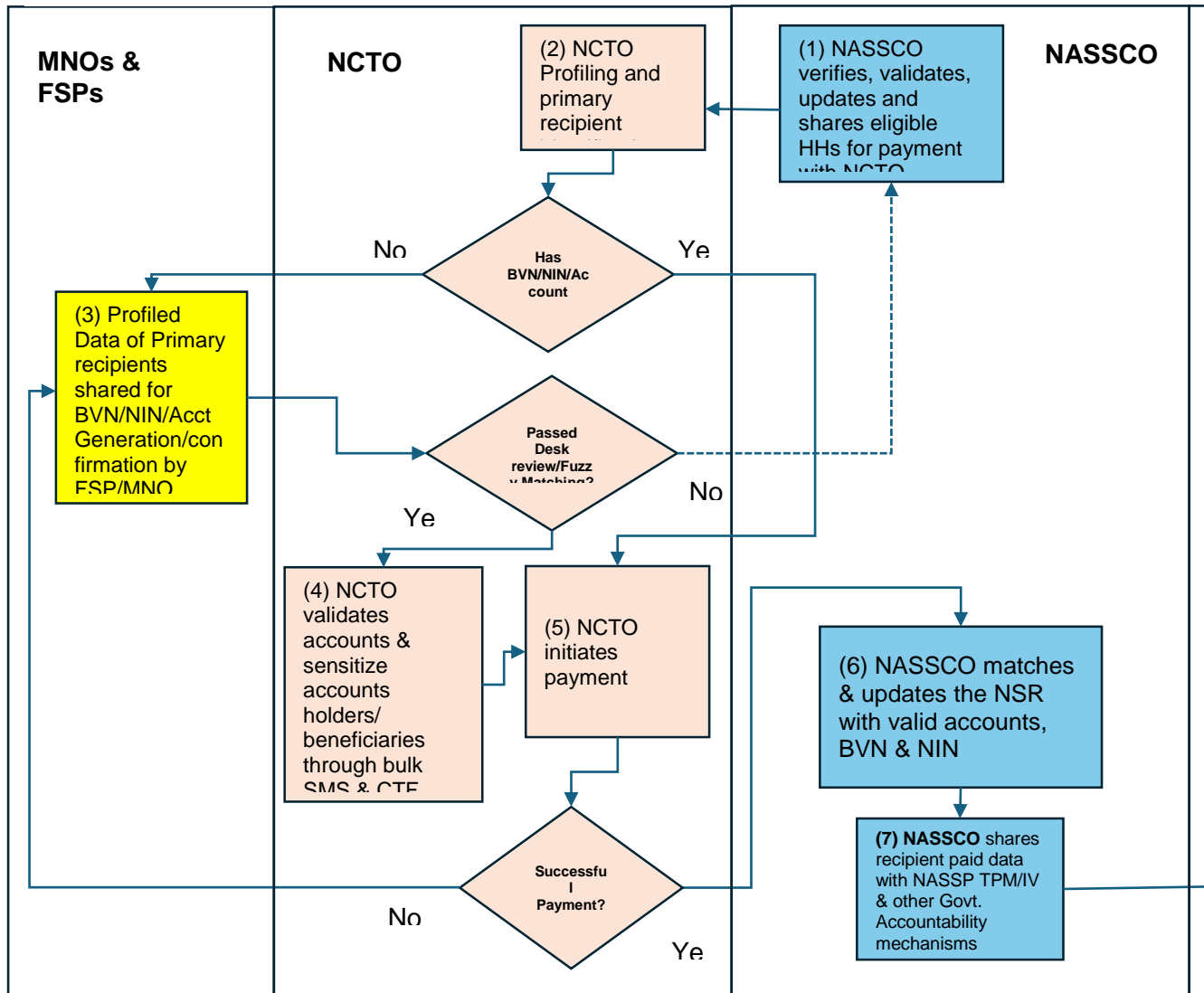
	and already with NIN/BVN but not captured in the NSR will be updated by SOCU validated through the NIMC API			
8	Both the data on (6) and (7) will be forwarded to NASSCO for fuzzy matching to ensure that the HH members are real owners of those IDs	T0 + 50days	NASSCO	
9	HH members that passed the fuzzy matching will be sent to NCTO for sensitization of their account numbers and further payments	T0 +55days	NCTO	
10	The HHs members that have passed payment will be forward to NASSCO for matching and updates while those that failed will be sent to the MNOs/FSPs for review.	T0 +65days		

### Operational Guidelines for BVN and NIN Integration

SN	ACTIVITIES	NASSCO	NCTO	FSPs	MNOs	ACCOUNTABILITY SYSTEMS	REMARK
1	Share Eligible HHs Data (from 8 decile and below) with NCTO	✓					
2	NCTO does Profiling and primary recipient identification with SCTU. Checks for Recipients with BVN/NIN/Accts for payment		✓				
3	Profiled/Primary Recipients Data shared for BVN/NIN Generation/Confir	✓	✓				

	mation By FSP/MNO undergoes verification and fuzzy matching for accounts opening. Else, returned to NASSCO for field validation on failed verification						
4	Data shared to MNO/FSP for Account opening generation		✓	✓	✓		
5	NCTO validates accounts & sensitize accounts to beneficiaries through bulk SMS & CFs	✓	✓	✓	✓		
6	NCTO Initiates Payment		✓	✓	✓		
7	NASSCO matches & updates the NSR with valid accounts, BVN & NIN		✓	✓	✓		
8	NASSCO shares recipient paid data with NASSP-SU Team & other Govt. Accountability mechanisms	✓					
9	The accountability systems conduct an independent verification exercise of paid data	✓					
10	The accountability systems share report of independent verification with NASSP-SU Team	✓	✓			✓	

## Flow Chart For NASSP-SU Operational Guideline for Nin, Bvn & Account Integration



## Chapter Four: Description of Project Environment

### 4.1 Location and Extent of Nigeria

Nigeria is located approximately between Latitudes 4° and 14° north of the Equator and between Longitudes 2° 2' and 14° 30' east of the Greenwich Meridian. To the north, it is bordered by the Republics of Niger and Chad, to the east by the Republic of Cameroon, to the south by the Atlantic Ocean and to the West by the Republic of Benin.

The surface area of the country is approximately 923,770 m<sup>2</sup>. About 35% of this land mass is believed to be arable while 15% is said to be used as pastures, 10% as forest reserve, 10% for settlements and the remaining 30% is considered uncultivable, for one reason or the other. However, another estimate puts the surface area as 91.07 million hectares, 57% of which is believed to be either under crops, or pastures while the remaining 43% is divided among forest, water bodies and other uses (Cleaver & Shreiber, 1994).

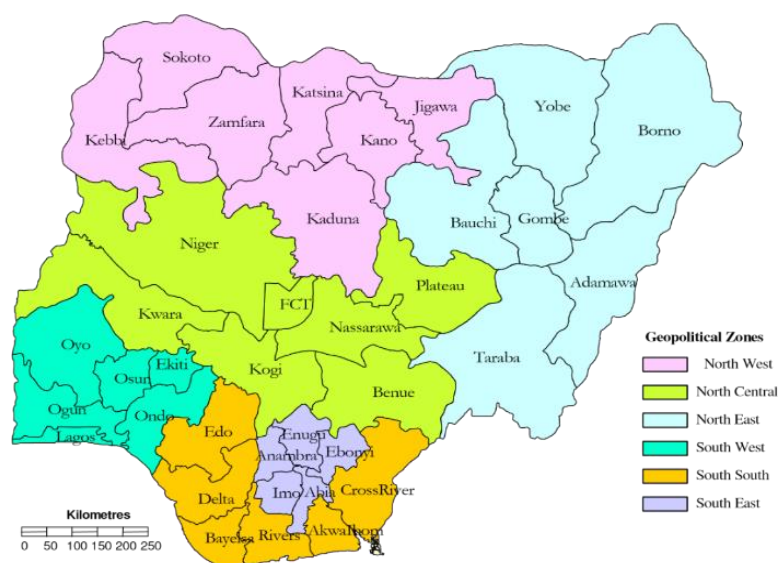


Figure 2: Map of Nigeria showing the 36 states and the FCT

Source: Orangesmile.com

Table 3: Country key specification

Nigeria, Capital - Abuja	
Specification	Details
Climate	Arid in the north, tropical in the center and equatorial in the south.
Rainfall	Wet and Dry Season
Temperature	Average annual maximum varies from 35°C in the north to 31°C in the south
Wind	The south-westerlies dominate the rainy season of the year while north-easterlies dominate the dry season

Soil	Heavily leached, reddish-brown, sandy soils are found in the south, and light or moderately leached, yellowish-brown, sandy soils in the north
River	Two major rivers tributaries, the Niger and the Benue
Ethnic Group	There are over 250 ethnic groups with three representing the dominate ones: Igbo, Hausa and Yoruba
Religion	Islam, Christian and Traditional Worshippers

## 4.2. Environmental and Social Baseline Conditions

### 4.2.1 The Physical Environment

#### 4.2.2 Climate and Meteorology

By virtue of its location, Nigeria enjoys a warm tropical climatic condition with relatively high temperatures throughout the year and two seasons: the dry and wet seasons. The climate of the country is influenced by the interaction of two air masses: the relatively warm and moist tropical maritime air mass (mT) which originates from the Atlantic Ocean and is associated with Southwest winds in Nigeria; and the relatively cool, dry and relatively stable tropical continental air mass (cTs) that originates from the Sahara Desert and is associated with the dry, cool and dusty North-East Trades (Harmattan)<sup>2</sup>. The boundary surface area between the two air masses is known as the Inter-tropical Discontinuity (ITD) or the Inter-tropical Convergence Zone (ITCZ). The ITD migrates north and south of the country bringing rainfall or dryness to different areas of the country at different times of the year. Roughly, its northward movement brings the wet season to all areas south of its location, while its southward migration brings the dry season to areas north of its location. In general, while there is hardly any dry season in the extreme southern tip of the country, the wet season hardly lasts for more than three months in the northeastern part of the country. Similarly, annual rainfall totals range from over 2,500mm in the south to less than 400mm in parts of the extreme north.

Ambient Air Quality: - the most recent data<sup>3</sup> indicates the country's annual mean concentration of PM<sub>2.5</sub> is 72 µg/m<sup>3</sup>, exceeding the recommended maximum of 10 µg/m<sup>3</sup>. Contributors to poor air quality in Nigeria include vehicle emissions, solid waste burning, and industrial emissions. Seasonal variations in pollution exist, with the highest levels of air pollution in the dry season (November to March). Available data indicates that Onitsha, Kaduna, Aba, and Umuahia have consistently high levels of air pollution.

#### 4.2.3 Geology, Landform, and Soils

The geology of Nigeria is dominated by igneous structures that form most of the highlands and hills. The rocks of the Basement Complex, mainly of igneous origin, are encountered in over 60% of the surface area. Younger Granites are intruded into these rocks in Jos Plateau and environs.

<sup>2</sup> Abaje, I.B and Oladipo, E.O *Recent Changes in the Temperature and Rainfall Conditions Over Kaduna State, Nigeria*, Ghana Journal of Geography Vol. 11(2), 2019 pages 127- 157

<sup>3</sup> <https://www.iqair.com/nigeria>.

Volcanic rocks are also extruded on to the surface in places such as Jos Plateau and Adamawa Highlands. Areas of sedimentary formations are restricted to the coastal belt; the Niger-Benue Trough, including the southeastern scarp land and the Sokoto-Rima basin; and the Chad Basin.

The landforms can simply be classified into highlands, plateaus, hills, plains and river valley systems. Suffice it to state that the landforms are more deeply dissected in the southern parts than in the northern parts. Indeed, except for the Eastern Highlands in Adamawa area and the Jos Plateau. The basins are characterized by broad gently sloping plains, which dominate the northern half of Nigeria. An extensive section of this area is identified as the High Plains of Hausa land (Udo, 1970).

Table 4: Productivity Potential of Nigerian Soils

Soil Productivity Grade	FAO Productivity Classes	Area	
		Km <sup>2</sup>	% of Total
High (1)	-	-	-
Good (2)	Fluvisols, Gleysols Regosols	50.4	5.52
Medium (3)	Lixisols, Cambisols, Luvisols, Nitosols	423.6	46.45
Low (4)	Acrisols, Ferralsols, Alisols, Vertisols	289.2	31.72
Low (5)	Arenosols, Nitosols	148.8	16.32

Source: Originally from FAO and reported in Agboola, S. A. 1979. An Agricultural Atlas of Nigeria, Oxford University Press, Oxford, Modified by IAR&T, Ibadan. 1996.

The geology and the geomorphological processes that shaped the landforms have greatly influenced the soils. The major soil types in Nigeria, according to the FAO soil taxonomy legends are fluvisols, regosols, gleysols, acrisols, ferrasols, alisols, lixisols, cambisols, luvisols, nitosols, arenosols, and vertisols. These soil types vary in their potential for agricultural use as shown in Table 3. Clearly none of these soils is rated as Class 1 with high productivity by the FAO. Indeed, over 48% of Nigerian soils fall into classes 4 and 5. These are mainly vertisols, alisols, acrisols, ferrasols, and arenosol. These soils usually have low productivity due to inadequate moisture retention capacity and low organic matter. What is more, except for the ferrasols, they are the most dominant types found in the northern dry parts of the country.

#### 4.2.4 Drainage and Hydrology

There are three major drainage systems in the country. These are: the River Niger drainage system; the coastal drainage system and the Lake Chad inland drainage system. The River Niger drainage system consists of the River Niger and its tributaries, prominent among which are: the Benue, the Sokoto-Rima, the Kaduna, the Gongola and the Anambra. The Lake Chad inland drainage system draws the following in flowing rivers from Nigeria: The Komadougou-Yobe (with headstreams including Hadejia, Jama'are and Misau) and the Yedseram. However, the Chari and Lagone rivers from the Central African Republic constitute the most important inflow.

The coastal drainage system consists of rivers and short streams draining directly into the Atlantic Ocean. Two sub-sets of this system can be recognized. There is the eastern system consisting of rivers and streams east of the Niger delta such as the Cross, Imo, Qua Iboe and Kwa rivers. The western system consists of the Ogun, Oshun, Owena and Benin rivers. The total area of inland water bodies is estimated to be slightly over 12 million hectares as shown in Table 5.

**Table 5: Summary of Water Surface Area of Lakes, Reservoirs and Major Rivers in Nigeria**

Body of Water	Area (ha)	% of Total
Lake Chad (Nigerian Sector)	550,000	4.46
Kainji Lake	127,000	1.03
Major Rivers	10,812,210	87.62
Reservoirs	275,000	2.23
Flood Plains	575,000	4.66
<b>Total</b>	<b>12,339.21</b>	<b>100</b>

Source: Adapted from Ita *et al* (1985)

The hydrology of Nigeria is influenced by the geologic structure. Areas of igneous structure are dominated by surface runoff while the areas of sedimentary formation are characterized by ground water retention. Most of the Chad Basin and the Sokoto-Rima Basin in the drier north are associated more with groundwater than surface water.

Nigeria has a large endowment of freshwater resources (286,200 MCM) and 23 percent of this supply originates outside the country. Renewable water supply (1,499 m<sup>3</sup>/capita) is just below the Falkenmark Water Stress threshold of 1,500 m<sup>3</sup>/capita due to Nigeria's large population (210 million) however, withdrawals are low relative to supply (9.67 percent) and well below the SDG 6.4.2 water stress threshold. ii Water stress is generally highest in the north whereas water is abundant in the south.

The Niger River is the most prominent Basin in Nigeria. The five Hydrological Areas that comprise the lower Niger Basin drain almost two-thirds of the country and account for about 60 percent of total runoff. The Niger Delta is the third largest in the world and features extensive mangrove coverage and biodiversity.

Water stress in northern Nigeria is increasing from rising municipal and irrigation water demand and declining groundwater levels. The recession of Lake Chad beyond Nigeria's borders, desertification, and more frequent and intense drought due to climate change have compounded water stress. Increasing competition over land and water resources between pastoralists and farmers is also contributing to regional instability and conflict.

Flooding is the most serious and frequent natural disaster and threatens communities, livelihoods, and infrastructure. Poor land use planning and inadequate storm water management elevates flood risks in cities, especially Lagos, which is worsened by rising sea levels. Climate change will increase flood risks nationwide, especially in southern Nigeria.

### 4.2.5 Surface and Groundwater Quality

Industrial hubs in cities like Lagos and Kano pollute surface and groundwater with heavy metals. Naturally occurring fluoride contamination affects groundwater in central and northern Nigeria.<sup>4</sup> Groundwater pollution related to human activities (agriculture, domestic waste, industry) are problems in shallow aquifers, particularly permeable unconsolidated deposits, which have little protection from surface activities. Natural groundwater quality issues have also been recorded. Examples of this include high salinity in shallow alluvial aquifers due to dissolution of evaporate minerals and high iron and manganese concentrations in confined aquifers with low dissolved oxygen (i.e. anaerobic).<sup>5</sup>

### 4.2.6 Vegetation

Based on the climatic conditions, the following vegetation types are recognized in the country: the mangrove and freshwater swamps, the rain forest, the Guinea Savanna, the Sudan Savanna and the Sahel in a south-north transect. Between the rain forest and the Guinea Savanna is a modified vegetation transition consisting of light deciduous forest and derived savanna.

The southern forest, that is, both the swamps and the rain forest constitute the country's main source of wood. The derived savanna zone, about 250km wide, was once the northern part of the forest zone, but transformed by such activities into a vegetation type consisting largely of deciduous trees and grasses. The vegetation still supplies some wood. Most of the remaining part of the country is the Sudan Savanna accounting for more than 25% of the surface area and expanding at the expense of the Guinea Savanna. At the northeastern and northwestern corners of the country is the Sahel that ordinarily does not account for more than 5 - 10% of the surface area but is now growing larger at the expense of the Sudan zone. Indeed, it is now more meaningful to take the two driest zones together as the Sudano Sahelian zone.

This is the ecological zone described as the Nigerian dryland by many researchers, containing most of the rangeland of the country. This zone constitutes the main source of fodder and grazing land for livestock. However, there is also the expansion of cultivation and extreme climatic variations that combine to reduce the grazing areas, and degrade the zone, including changes in plant species.

## 4.3 Waste Management in Nigeria

Waste management in Nigeria is evolving from a situation where there was little to no waste collection or management to the current situation of intermittent collection and dumping in a designated dumpsite, to a future, envisaged to be characterized by a modern integrated waste management approach. Waste management structures exist in most of the urban and rural areas in Nigeria. However, the overall system is characterized by the large-scale informality of operators and operations. Solid waste management in Nigeria is based on collection of mixed municipal waste including organic components and disposal of municipal solid waste in open dumps, electronic waste, waste piles along the streets, existing burrow pits or wetlands.

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<sup>4</sup> Nigeria water resources profile series. [https://winrock.org/wp-content/uploads/2021/08/Nigeria\\_Country\\_Profile\\_Final.pdf](https://winrock.org/wp-content/uploads/2021/08/Nigeria_Country_Profile_Final.pdf)

<sup>5</sup> [British Geological Survey & WaterAid. 2003. Groundwater Quality: Nigeria. WaterAid Groundwater Quality Factsheets by Country](#)

### 4.3.1 E-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 by the owner as waste. Examples of electronic waste include, but not limited to **TVs, computer monitors, printers, scanners, keyboards, mice, cables**, circuit boards, lamps, clocks, flashlight, calculators, phones, tablets, power bank, answering machines, digital/video cameras, radios, VCRs, DVD players, MP3 and CD players, etc.

The primary interest of the Project in e-waste is the management of e-waste footprint in an environmentally friendly way through adherence to the national and global e-waste management standards. This involves re-use of items where possible, submitting items for recycling, dismantling or outright disposal through an authorized institutional framework.

According to the UNEP<sup>6</sup>, Nigeria is the leading importer of electrical and electronic equipment on the African continent, processing over half a million tons of discarded electronics each year. Nigeria is signatory to several international guidelines as indicated in section 2.8. Additionally, the National Environmental Standards and Regulations Enforcement Agency of Nigeria (NESREA) is responsible for implementation of environmental laws and guidelines in line with international best practice. The Government of Nigerian is taking action to ensure sustainable waste management in-country, with amendments to National Environmental (Electrical and Electronic sector) regulations<sup>7</sup>, to tackle the country's growing e-waste problem. With the amendment, manufacturers, importers, and retailers will be legally and financially responsible for the management of their waste products. The amendment will also promote resource conservation and increase recycling, while encouraging manufacturers to design eco-friendly alternatives. Importers are no longer allowed to import non-functional electronics into the country (UNEP, 2023).

### 4.3.2 E-Waste Impact

Informal e-waste recycling activities in Nigeria include mainly dismantling, uncontrolled dumping and burning. During collection as well as refurbishment or repair of e-waste, negative impacts can partly occur but are generally at a significantly lower level. Recycling activities often take place on unfortified ground where harmful substances released during dismantling are directly discharged to the soil. Burning copper cables and wires, as well as monitor and TV casings, creates an accumulation of ash and partially burned materials at the burning sites. Emissions occurring from open burning of cables can be assumed to be a major source of dioxin emissions for Nigeria.

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<sup>6</sup> Nigeria acts to fight growing e-waste epidemic (Jan 2023) <

<https://www.unep.org/gef/news-and-stories/press-release/nigeria-acts-fight-growing-e-waste-epidemic?>

<sup>7</sup> This is supported by the *Global Environment Facility*, funded initiative led by the UN Environment Programme (UNEP) and executed by the *National Environmental Standards and Regulations Enforcement Agency of Nigeria* (NESREA)

## 4.3 Socio-Economic Environment

### 4.3.1 Population and Urbanization

Nigeria is Africa's most populous nation; one out of every five people in sub-Saharan Africa lives here. The population is estimated at more than 206 million people from the last 2006 census. Almost half of the population of Nigeria live in urban areas, most of them in large, sprawling cities in the south like Lagos, Ibadan, Warri, Benin City and Port Harcourt. Cities of over 5 million people like Kano, Kaduna and Sokoto also exist in the north. The population is characterized by a strong rural to urban migration, annual growth rate estimates are over 3%. Population densities, even in rural areas, especially in the southeast part of the country, are often above 200 persons /km<sup>2</sup>.

With the population increasing very rapidly at the rate of 3.2 percent per annum, the current estimate is about 206 million as of 2021, with the ratio probably shifting in favor of females (51 percent). Thus, today, Nigeria accounts for about a quarter of the total population of the African countries, south of the Sahara, and its people consist of over 200 ethnic groups, speaking about 395 languages and dialects.

Besides the rapid increase in the total population, there has been a rapid rate of urbanization over the years. It is believed that the rate of urbanization is between 5 and 10%. The main reason for the rapid rate of urbanization is the creation of more growth poles through the creation of more states and local government areas. The provision of infrastructure at the headquarters usually aggravates the inequality between the rural and urban centers, leading to increased rural-urban migration. Rapid urbanization results in rapid construction and clearance of vegetation within and outside the urban centers to satisfy the needs of the urban people as well as urban congestion.

This combination of expanding population and increasing poverty puts increasingly severe demands upon the natural environment, the institutional structures and the resources available to manage them. The technical capacity to deal with the enormity of the problem is generally weak and the lack of enforcement of (and compliance with) existing regulations makes for huge institutional obstacles when trying to effectively tackle environmental issues.

Nigeria is comprised 36 states and a Federal Capital Territory (FCT) grouped in six geopolitical zones. Table 6 shows how the states are grouped by zone and presents the geographic distribution of the states. The nation's capital, Abuja, was officially moved from Lagos in 1991.

Table 6: Nigeria's Geopolitical Zones and States Distribution

S/N	Zone	Constituent States
1	North West	Jigawa, Kaduna, Kano, Katsina, Kebbi, Sokoto, Zamfara
2	North East	Adamawa, Bauchi, Borno, Gombe, Taraba, Yobe
3	North Central	Benue, Kogi, Kwara, Nassarawa, Niger, Plateau
4	South West	Ekiti, Lagos, Ogun, Ondo, Osun, Oyo
5	South East	Abia, Anambra, Ebonyi, Enugu, Imo
6	South South	Akwa-Ibom, Bayelsa, Cross-River, Delta, Edo, Rivers
Federal Capital Territory		Abuja and environ.

### 4.3.2 Nigerian Economy and Poverty Profile

Nigeria is a lower-middle income country that has mineral and natural resources and vast arable land. Yet, it hosts the highest number of extremely poor in the world. By 2030, there will be 120 million people living on less than US\$1.9 a day, meaning that the share of Nigeria's population

living in extreme poverty is 40.1 percent (in 2019). Conflict and climate change, especially in the Northeast, further exacerbates the situation.

The rapid population growth and urbanization described earlier have fueled a rapid economic development in Nigeria. The interaction of these phenomena leads on a positive note, to the expansion of agriculture and changes in the agriculture practiced. However, when the increased population and its demands are pitched against dwindling resources of government and inflationary rates, it is seen clearly why the citizens of Nigeria have been greatly impoverished in recent years.

Recognizing the urgent need for social protection, the Government of Nigeria has adopted a National Social Protection Policy (NSPP), which commits it to establishing a social protection floor. In 2016, social assistance coordinating platform was set up in the Office of the Vice-President to provide oversight to all social safety net interventions at Federal and State level. In 2019, President Buhari announced his commitment to lift 100 million Nigerians out of poverty and set up a new Federal Ministry of Humanitarian Affairs, Disaster Management and Social development (FMHDS) to institutionalize social protection in the country. The budget allocated to social protection has recently increased and a digital national ID system has been created, which should link residents to social services and ensure financial inclusion.

Social protection mechanisms are being significantly challenged by the socio-economic impact of the pandemics. The Covid-19 pandemic and the lockdown in 2019 had dramatic consequences for the 90% of Nigerians working in the informal sector and families who depend on daily incomes for their survival. This groups were among the hardest hit groups, as their economic resilience and ability to cushion income shocks is low. With an over representation in the informal sector, women are particularly affected, while also having to deal with an increased burden of care. The World Bank (WB) predicts that an additional 5 million Nigerians will move into poverty, and a recent UNDP estimate showed that the economic shut down and ongoing restrictions on movement and the inability to engage in economic activities could lead to an increase in poverty levels to those of 20 years ago, pushing over 65 million people into transient poverty.<sup>8</sup>

The government has recognized that by supporting incomes during and after shocks, households will have the potential to sustain economic activity and maintain levels of consumption and investment, mitigating the risk of a prolonged recession and deepening inequalities and poverty. To this end, the Government of Nigeria committed to expand the existing Conditional Cash Transfer (CCT) programme under existing criteria as well as extend income support to vulnerable groups and workers and small and medium enterprises in the formal and informal sector affected by the crisis.

### **4.3.3 Public Health**

Public health issues include diseases and conditions that impact entire populations. These diseases may be chronic diseases, such as Type 2 diabetes, asthma, or heart disease; infectious diseases, such as, measles, tuberculosis, or influenza; diseases spread through unsanitary conditions, such as cholera or typhus; or conditions such as cancer or mental health disorders.

Other public health concerns include the following:

- Behaviour, such as drug, alcohol, and tobacco use, that impact wellness and raise mortality rates, among other outcomes.

- Environmental conditions that impact health, such as poor air, water and food quality
- Low immunization rates, leading to diseases being spread to vulnerable populations.
- Safety concerns, such as unsafe workplaces or infrastructure
- Climate concerns, such as elevated temperatures and violent weather

Some public health threats will require immediate action. Diseases of Public Health concern for example, require constant update of responses. Communicability and contagiousness are often conflated. However, a disease may be infectious but not contagious; for example, tetanus is an infection caused by bacteria. It cannot be transmitted to another person. On the other hand, strep throat is an infection, which is also caused by bacteria, but it is very contagious and can be transmitted to others.

See Annex 4 for the guideline for Project response to Infectious Diseases.

#### 4.3.4 Gender and GBV

Gender Based Violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences. Although most of the victims are women, men could also be victims. It can take on several forms including physical, sexual, emotional, and mental. It has been acknowledged worldwide as a violation of basic human rights. GBV is rooted in power inequalities between women and men with those in privileged positions or significantly better positions of power being the perpetrators.

In recent years, GBV has been on the increase in recent times, and more research highlights the health burdens, intergenerational effects, and demographic consequences of such violence (United Nations, 2006)<sup>9</sup>. This may be because of an increase in the number of women who are reporting their experience of domestic violence in recent years. For instance, the year 2018 alone, saw a 134% increase in the cases of GBV across Lagos State.

This issue is not only devastating for survivors of violence and their families but also entails significant social and economic costs. In some countries, violence against women is estimated to cost countries up to 3.7% of their GDP – more than double what most governments spend on education.

From a global perspective, the occurrence of GBV is on the increase and prevalent across the globe. According to the World Bank.

- 35% of women worldwide have experienced either physical and/or sexual intimate partner violence or non-partner sexual violence.
- Globally, 7% of women have been sexually assaulted by someone other than a partner.
- Globally, as many as 38% of murders of women are committed by an intimate partner.
- 200 million women have experienced female genital mutilation/cutting.

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<sup>9</sup> United Nations. 2006. *Secretary-general's in-depth study on all forms of violence against women*. New York: United Nations

In Nigeria, GBV is growing astronomically, particularly with the activities of the insurgency in the Northeast. From forced and early marriages to the physical, mental or sexual assault on women, 3 in 10 Nigerian women have experienced physical violence by age 15.<sup>10</sup>

In Nigeria, spousal abuse has become a scourge and there is a report that 50% of our women have been battered by their husbands at one time or the other and unbelievably, more educated women (65%) are in this terrible situation as compared with their low-income counterparts (55%).

The UN statistics reveal that the from all the different forms of Violence against Women child marriage is the most common and most prevalent particularly in the northern parts of Nigeria as shown below.

- Physical and/or Sexual Intimate Partner Violence in the last 12 months: 11 %
- Lifetime Non-Partner Sexual Violence: 1.5
- Child Marriage: 43.5
- Female Genital Mutilation/Cutting: 18.4

In Nigeria, the south south zone of Nigeria recorded the highest number of cases of physical violence with 52.2% while the northwest zone recorded the least at 6.9%. The southwest in which Lagos State is located recorded an average of 37.1%. In terms of physical violence experienced, Edo State and Benue States recorded the highest and second highest in the country with 75.4% and 72.1% respectively.

*Key Findings from Nigeria National survey:*

- Twenty-eight percent of women age 15-49 have experienced physical violence at least once since age 15, and 11 percent experienced physical violence within the 12 months prior to the survey.
- Seven percent of women age 15-49 report having experienced sexual violence at least once in their lifetime.
- Overall, 25 percent of ever-married women age 15-49 report ever having experienced emotional, physical, or sexual violence from their spouse and 19 percent report having experienced one or more of these forms of violence in the past 12 months.
- Among ever-married women who had experienced spousal physical violence in the past 12 months, 33 percent reported experiencing physical injuries.
- Forty-five percent of women who experienced violence never sought help or never told anyone about the violence.

**Source:** Nigeria Demographic & Health Survey (NDHS) 2013

Adamawa State has the highest number of sexually violated girls/women between the age of 14 and 49 at 38.4% while Taraba had the second highest with 28.1%. Katsina recorded the least with 0.6%. The south west geopolitical zone recorded 37.1%. The north east zone of Nigeria recorded the highest number of cases of sexual violence with 15.7% while the north west zone recorded the least at 2.3%. The south west in which Lagos State is located recorded an average of 4.6%.

Lagos State has the highest percentage of girls/women between the age of 14 and 49 who have experienced physical violence estimated at 43.9%. This is also the eleventh highest figure recorded in Nigeria and the second highest in the south west geo-political zone of Nigeria (Nigeria Demographic & Health Survey (NDHS) 2013).

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<sup>10</sup> Nigeria Demographic and Health Survey (NDHS) 2013

The state also recorded the eighteenth highest percentage of girls/women between the age of 14 and 49 who have experienced sexual violence estimated at 43.9%. This is also the highest number recorded in the south west geo-political zone of Nigeria.

In Lagos State as with most of Nigeria, victims of GBV, both male and female, are afraid of reporting incidents because of stigmatization. Consequently, these figures may not completely detail the through picture of GBV situations in the state and in Nigeria.

#### 4.3.5 Other Vulnerable Groups

Defining vulnerability is difficult - vulnerability can stem from external shocks and it also depends on historical, cultural, social, environmental, political, and economic conditions of a given setting. Determinants of vulnerability range from socioeconomic status and living conditions to the power structures that underpin social organization. There is no universally accepted approach for measuring vulnerability. To this extent, vulnerability is dynamic with evolving changes and heterogeneous even with the same vulnerable group. Figure 3 below shows the schematics description of potential pathways into vulnerability.

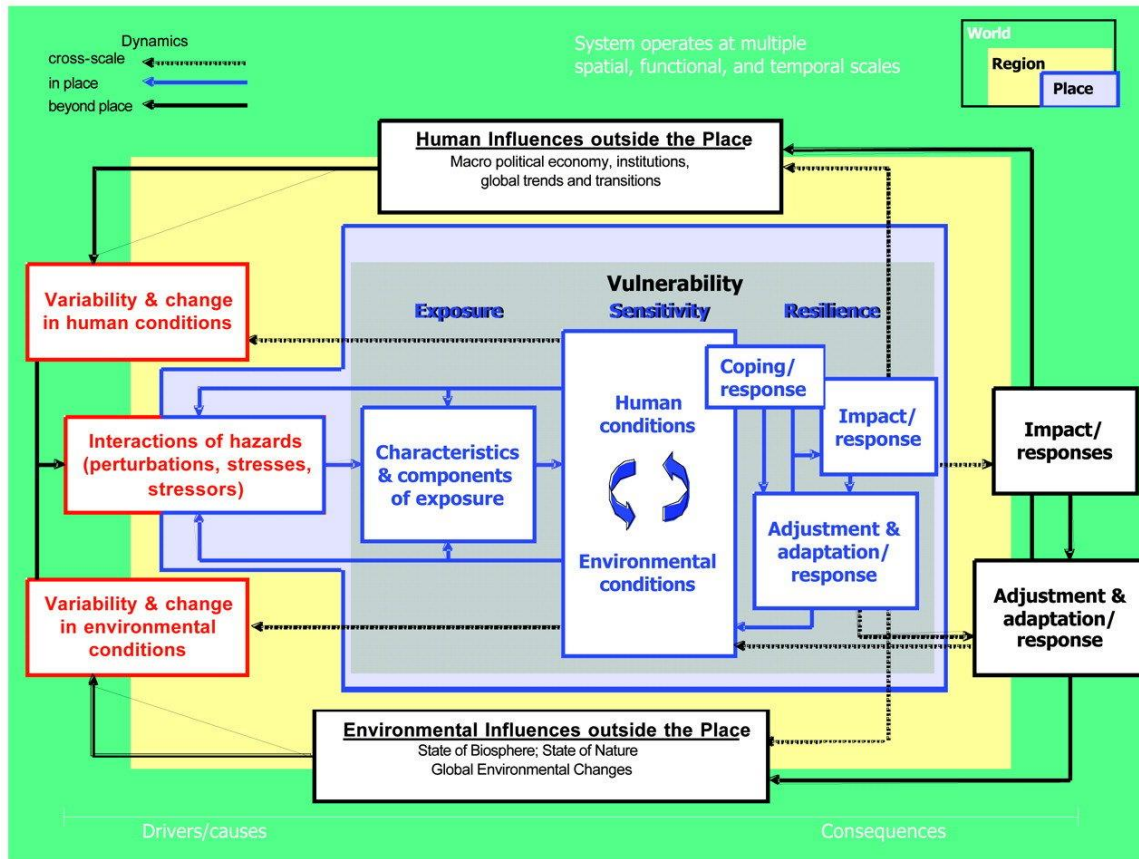


Figure 3: Vulnerability Framework (Turner et al. 2003)

Understanding the specific context of vulnerability, especially the dynamic changes of vulnerable groups for example, in urban areas, the most vulnerable groups to environmental hazards tend to be:

- Individuals/households living in poor quality homes and neighborhoods lack adequate provision for water, sanitation, drainage and garbage removal.
- The persons doing the 'dangerous' tasks within households (generally women and children).
- Income-earners with particularly hazardous work.
- Groups facing discrimination in obtaining adequate incomes, housing and basic services; in many societies, particular ethnic groups or castes face discrimination in all these.
- Communities and households are vulnerable to shocks of human-made and natural disasters.

### Vulnerable Groups

Vulnerable groups are physically, mentally, or socially disadvantaged persons who may be unable to meet their basic needs and may therefore require specific assistance. Persons exposed to and/or displaced by conflict or natural hazard may also be considered vulnerable.

The most vulnerable populations in Nigeria include:

- children 5 years and below,
- pregnant women,
- people living with disabilities,
- elderly,
- displaced,
- unemployed,
- retirees and the sick.
- Poor people

## **Chapter Five: Potential Environmental and Social Risks & Impacts and Mitigation**

### **5.1 Introduction**

This section identifies and describes potential environmental and social risks and impacts of eligible activities that will be supported or financed by the project. The risks are identified based on the preliminary risks assessment of project activities against the baseline of the project and used the relevant policy and regulatory instruments as guiding framework.

### **5.2 Potential Environmental and Social Impacts/Risks**

#### **5.2.1 Potential Positive Impacts**

The project is expected to generate the following positive E&S impacts:

- The Project is expected to positively impact the identified population as it will critically address the social economic shocks associated with subsidy removal, and inflation rates in Nigeria
- The project will also provide short-term cash transfers to poor and vulnerable urban and rural population in response to the current economic shocks while protecting the livelihoods of targeted chronically poor households.
- The Project will build on and scale up the existing CT delivery system which will continue to support vulnerable populace in Nigeria.

- The project will strengthen policies, institutions, and investments for rebuilding better in cases of pandemic and inflation.
- The proposed strengthening of the social protection delivery system, and particularly the expansion of the RRR platform, will support Nigeria in responding better to future crisis.
- In addition, the project is aligned with and will contribute to the achievement of the government's policy priorities in particular, "The National Poverty Reduction with Growth Strategy, March 2021", which is aimed at supporting the government vision to lifting of lifting 100 million people out of poverty in within 10 years.
- The project will support improving social protection mechanism in Nigeria, which is one of the key climate-change adaptation priorities under the United Nations' Nationally Determined Contributions (NDC).
- Strengthening of social assistance delivery system will strengthen the foundations of the public sector and enhance resilience.
- The project GBV awareness, prevention & response activities such as GBV Mapping, signing of the Code of Conducts and the GRM will support the overall drive for the state in prevention of GBV related issues and provision of a response mechanism for survivors.
- Majority of the beneficiaries are female; access to cash transfer programs will empower the female beneficiaries, build human capital which will enable address issues of gender inequity.

### 5.2.2 Potential Negative Impacts

Despite these general positive impacts, the implementation of some project activities is expected to create and/or exacerbate existing environmental and social impacts. Potential environmental and social risks are presented below.

- Social risks associated with insecurity (banditry/kidnapping, robbery,
- Occupational safety risk associated with travelling by road or boats , mob attacks due to misunderstanding/misinformation, etc) may affect staff.
- Generation of e-wastes from the disposal of computers and accessories for program management as well as for system development activities of the program especially at the National and state levels.
- Social exclusion of untargeted vulnerable groups such as persons with disabilities, persons living in slum communities, internally displaced persons (IDPs) living in camps located in urban areas, people that may be excluded due to non-capture in the Registry (CBT/RRR) as a result of insufficient effort to reach them, or issues with network connectivity and bank accounts, people unable to register due to lack of phones, insecurity, displacement, etc.
- Potential for incorrectly identifying the poor in urban areas due to the use of spatial analysis, additionally, there may be irregular collection of detailed population data.
- Complaints and grievances due to selection process and service delivery.
- Project-induced SEA/SH risks.
- Access difficulty for the elderly, persons with disabilities, and remote groups.
- Access difficulty for vulnerable persons with limited digital and financial literacy to understand and access virtual cash.
- The need to take public transportation, which may expose vulnerable persons to GBV.
- Lack of foundational identities to support digital transfers could disenfranchise PVHHs in areas with low coverage of financial access points.
- Issues on data protection.

## 5.3 Labour Influx, GBV Risks and Management Mechanisms

### 5.3.1 Labour Influx Risks

Although the project does not foresee hiring any direct workers, the implementing agencies consists of civil servants and consultants responsible for administrative work and working with payment service providers (PSP) to ensure service delivery at the community level. A Labor Management Procedures (LMP) has been included in this report as Annex 1. The LMP includes terms and conditions of employment, non-discrimination and equal opportunity, the establishment of worker's organizations, and occupational health and safety (OHS) measures regarding communicable diseases.

The ESMP also addresses potential project induced SEA/SH issues that may be perpetrated by PSP. NASSP SU will benefit from the GBV Mapping of Service Providers exercise embarked on by NASSCO PIUs for the referral of SEA/SH cases across all 36 states and the FCT. The LMP also sets out grievance arrangements for project workers. Other GBV mitigation actions established under NASSP such as Codes of Conducts and GBV-GRM will continue to apply under the NASSP SU.

### 5.3.2 Gender Based Violence (GBV) Risks

GBV is a violation of human rights, then, a global issue that cuts across boundaries of economic wealth, culture, religion, age, and sexual orientation. In social project such as the NASSP-SU, various forms of GBV such as SEA/SH issues can be perpetrated by PSPs and Intimate Partner Violence (IPV) at the household level (although this is beyond the remit of the project, the project will continue to use communication channels to push positive gender and social norms at the beneficiary level).

#### 5.3.2.1 Measures/Actions to be taken

- ✓ Implement the activities provided in the SEA/SH Action Plan.
- ✓ Prioritize code of conduct signing by the relevant parties and integrate outcomes into the GBV action plan.
- ✓ Conduct community training on SEA/SH reporting and accountability mechanisms only when the response mechanisms are available.
- ✓ Include information on SEA/SH prevention and mitigation considerations in all relevant documents.
- ✓ Utilize the GBV mapping, and referral pathways developed under NASSP.
- ✓ Ensure availability of an effective GBV grievance mechanism (GM) contained in NASSP GRM Manual. Where relevant, the Gender focal persons will be retrained by the project on handling cases in line with the GM manual to ensure confidentiality, survivor-centered and referral of cases.
- ✓ Mandatory Codes of conduct on GBV prevention will be signed by all workers and managers, and trainings and refreshers will take place on an ongoing basis, including focus on SEA and sexual harassment.
- ✓ Continue to use Third Party Monitors (TPM) for the project with experienced GBV staff to monitor implementation of the SEA/SH Prevention and Response Action Plan and ensure all parties are meeting their responsibilities.

## Chapter Six: Grievance Redress Mechanism

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

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects.
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances.
- Avoids the need to resort to judicial proceedings (at least at first).

The Project will adopt the GRM established in the NASSP. A comprehensive GRM Manual has been reviewed and updated to align with the requirements of the NASSP-US project.

### 6.1 Description of the GRM

NASSP already has a fully developed and functional GRM system, guided by an approved GRM manual. Under the NASSP, 74 State GRM Managers and 774 Local Government (LG) grievance redress officers (GROs) were recruited and trained across the 37 States and FCT. In addition, community level grievance redress volunteers (GRVs) with one male and one female were appointed in all the communities.

The NASSP GRM includes the following steps:

- o Step 1: Submission of grievances either orally, in writing via suggestion/complaint box, through telephone hotline/mobile, call center, mail, SMS, social media (WhatsApp, Instagram, Twitter, Facebook, etc.), email, website, etc.

Step 2: Recording grievance, classifying grievances based on the categories of complaints and the complainants (who can be anonymous or request confidentiality) to provide more efficient response, and providing the initial response immediately as possible. The categories will be based on the nature of the complaints (e.g., targeting, payment, fraud and corruption, service delivery etc.) Step 3: Grievances will be received and registered at each tier (national, state, LGA and community) while investigation and resolution are done at national and state levels depending on the category of the complaint withing the timeline as stipulated in the manual. Step 4: Complainant Feedback: Grievances are set to be satisfactorily resolved when feedback is provided to the complainant.

NASSP GRM has developed an IT based system to manage the entire GRM system. Monthly/quarterly reports in the form of a summary of complaints, categories, status of complaints, and turnaround time for resolution are submitted for review to all focal points at different levels. Once all possible avenues of redress have been proposed and if the complainant is still not satisfied then s/he will be advised of their right to escalate to the next level or take legal recourse.

**Handling GBV issues: Currently** under NASSP, the National and State PIUs are implementing activities provided in the GBV Action Plan which also includes mapping of GBV Service Providers in all the 36 states and the FCT. The Bank Social Team supports activities towards the development of SEA/SH Manuals, and training on the mapping processes. All GBV cases

received by the community level, state level and national level GRC will be referred to by the GBV Service Providers. GBV referral pathways will be established and updated in line with NASSP structures from the local to the national. Psychosocial support will be available for women and girls who may be affected by shocks and are also GBV survivors.

The GRM system in place for the NASSP project will also be used for addressing GBV-related issues under NASSP-SU and will have in place mechanisms for confidential reporting with safe and ethical documenting of issues under NASSP-SU. These details of the mechanism can be found in the existing NASSP SU GRM manual. Further, the GRM will also have in place processes to immediately notify both the NASSP-SU and the World Bank of any GBV complaints, with the consent of the survivor. The project will also educate the public that the GRM can be utilized to raise concerns or complaints, especially related to GBV and SEA/H issues. Thus, the existing GRM is strengthened with procedures to handle allegations of GBV/SEA/SH violations.

Focus will be given on the category of complaints and complainants to provide more efficient management. Possible examples: the highly vulnerable, people with disabilities, people facing language barriers, etc.

## 7.1 Introduction

As part of this ESMP, a project specific E&S management and monitoring matrix has been designed to identify potential impacts and outline mitigation measures with well-defined desired outcomes and actions to address all potential negative impacts. The ESMP matrix outlines the potential impacts associated with project specific activities with corresponding mitigation measures, impact rating, responsibility (mitigation/monitoring) and cost of mitigation/monitoring. This ESMP also presents recommendations for mitigating and monitoring measures, and institutional responsibilities. The NASSCO and NCTO team will be responsible for ensuring coordination and monitoring the implementation of the ESMP throughout the Project’s lifecycle.

## 7.2 Roles and Responsibilities in implementing the ESMP

The successful implementation of the ESMP will depend on the commitment and capacity of the NCTO and NASSCO team including their state counterpart. The roles and responsibilities of relevant stakeholders has been clearly delineated and assigned as outlined in Table 8 below.

Table 8: Roles and Responsibilities

S	Category	Roles & Responsibilities
1.	State Ministries of Environment	<ul style="list-style-type: none"> <li>▪ Environmental monitoring and compliance overseer at the State level</li> <li>▪ Disclose draft ESMP report (in liaison with Federal Ministry of Environment and PIU)</li> <li>▪ Site assessment and monitoring of ESMP implementation.</li> </ul>
2.	Federal Ministry of Environment/EIA Department & NESREA	<ul style="list-style-type: none"> <li>▪ Review of draft ESMP (in liaison with State Ministry of Environment and PIU), receiving comments from stakeholders on the project provide disclosure letter and disclose the ESMP in the FMEnv corporate site.</li> <li>▪ The external environmental and social monitoring, carried out by the Federal Ministry of Environment and designated agency, at its discretion is to verify the quality of implementation of environmental and social standards.</li> </ul>
3.	Environmental & Social Unit	<p>The Project Environmental and Social internal monitoring is carried out by the Project’s E&amp;S Experts with the aim of ensuring that environmental and social standards of the project are adhered to. The monitoring activity will include: (i) ensuring mitigation measures recommended for the identified impacts and risks are applied (ii) the providing compliance oversight during project implementation activities; and (iii) monitoring of environmental and social indicators during the implementation of different activities.</p> <p><b><u>Environmental Safeguards</u></b></p> <ul style="list-style-type: none"> <li>▪ Analyse potential environmental and social impacts.</li> <li>▪ Ensure that these activities are implemented in accordance with best practices and guidelines set out in the site specific ESMP.</li> <li>▪ Identify and consult with all stakeholders involved in environment related issues in the project; and be responsible for the overall monitoring of mitigation measures and the impacts of the project during implementation.</li> </ul>

S	Category	Roles & Responsibilities
		<ul style="list-style-type: none"> <li>▪ Prepare monthly environmental safeguards compliance report.</li> </ul> <p><b>Social Safeguards</b></p> <ul style="list-style-type: none"> <li>▪ Develop and coordinate and ensure the implementation of the social aspects of the ESMP.</li> <li>▪ Ensure that the project design and specifications adequately reflect the recommendations of the ESMP.</li> <li>▪ Co-ordinate application, follow up processing and obtain requisite clearances required for the project.</li> <li>▪ Identify and liaise with all stakeholders involved in social related issues in this subproject.</li> <li>▪ Conduct impact evaluation and beneficiary's assessment.</li> <li>▪ Liaise with various Federal and State Government agencies on social regulatory matters.</li> <li>▪ Establish dialogue with the affected communities and ensure that the social concerns and suggestions are incorporated and implemented in the project.</li> <li>▪ Supervise the Grievance Redress Committee (GRC) which oversees handling and addressing grievances/complaints.</li> <li>▪ Prepare monthly social safeguards reports.</li> </ul>
4.	NASSCO & NCTO	<ul style="list-style-type: none"> <li>▪ Each of the Project PIUs (NASSCO and NCTO) will provide oversight on the application of environmental and social standards as it affects their project roles and responsibilities.</li> <li>• Also, Support the state to ensure compliance with World Bank ESF and relevant laws in Nigeria</li> <li>• Oversight functions of E&amp;S coordination and reviewing E&amp;S reports prior to sending them to the World Bank</li> <li>• Ensure the state sends in monthly and quarterly E&amp;S compliance reports and collates for the attention of the World Bank</li> <li>• Conduct periodic monitoring and supervisory visits to the sites</li> <li>▪ Support the states in articulating corrective E&amp;S action plans</li> </ul>
5.	SOCU & SCTU	<ul style="list-style-type: none"> <li>▪ Consult closely with State Ministry of Environment in preparing a coordinated response on the environmental and social aspects of project development respectively.</li> <li>▪ Safeguards due diligence.</li> <li>▪ Compliance of field activities to specification as provided in the ESMP</li> <li>▪ Ensure all relevant project workers sign the Code of Conduct (CoC) and are routinely trained on the contents of the CoC</li> <li>▪ Prepare the SUCO E &amp; S Units' ECOP for approval.</li> <li>▪ Implement C-ESMP during project implementation</li> <li>▪ Prepare and maintain records and all required reporting data as stipulated by the ESMP, for submission</li> </ul>
6.	State Government MDAs	<ul style="list-style-type: none"> <li>▪ Other MDAs come in as and when relevant areas or resources under their authority or management are likely to be affected by or implicated projects.</li> <li>▪ Participate in the EA processes and in project decision-making that helps prevent or minimize impacts and to mitigate them. These institutions may also be required to issue a consent or approval for an aspect of a project; allow an area to be included in a project; or allow impact to a certain extent or impose restrictions or conditions, monitoring responsibility or supervisory oversight.</li> </ul>
7.	State Waste Management Authority	<ul style="list-style-type: none"> <li>▪ Inspection of project premises to ensure strict compliance with sanitation and waste management standards in the state.</li> <li>▪ support the collection/evacuation of waste from the project sites</li> </ul>

S	Category	Roles & Responsibilities
		<ul style="list-style-type: none"> <li>▪ Ensure management of project e-waste in line with best environmental practices so as not to degrade or pollute the environment.</li> </ul>
8.	Security Establishments (Police, Civil Defense, FRSC, etc.)	<ul style="list-style-type: none"> <li>▪ Safeguarding and upholding the standards of the Environmental and Social Framework by ensuring safety, protecting human rights, and contributing to the sustainability and integrity of the development process. Security activities must align with the ESF's <b>"Do No Harm"</b> principle to prevent unintended social or environmental consequences.</li> </ul>
9.	World Bank	<ul style="list-style-type: none"> <li>▪ Overall supervision and provision of technical support and guidance. Overall responsibility to ensure that its safeguards policies are complied with.</li> <li>▪ Responsible for the final review and clearance of the safeguard's instruments; as well as review and approval of TORs; including supervision.</li> </ul>
10.	Others/General Public	<ul style="list-style-type: none"> <li>▪ Identify issues that could derail the project and support project impacts and mitigation measures, Awareness campaigns.</li> </ul>

### 7.3 ESMP Matrix

The ESMP matrix in table 9 below highlights identified potential impacts at the pre-implementation, implementation and post-implementation (operation) phases of the proposed intervention. It further details the measures for mitigating identified potential impacts, highlighting responsibilities and implications for implementing and monitoring the implementation of the given mitigation and monitoring measures. The ESMP mitigation measures captured will be implemented per state.

Table 9: Environmental and Social Management Plan per state

Sub—project Activities	Potential E&S Risks	Impact Rating	Mitigation Measures	Responsibility Mitigation/ Monitoring	Cost (NGN ₦ Mitigation/ Monitoring)	Cost (US\$ Mitigation/ Monitoring)
Door to Door Registration and verification exercise	<ul style="list-style-type: none"> <li>• Misinformation/misunderstanding</li> <li>• Tension</li> <li>• Crisis</li> <li>• Clash</li> <li>• Criminal intents and attacks intents</li> <li>• Physical attack, etc.</li> <li>• Motor Accidents</li> </ul>	Substantial	<p>Project and thematic specific communications,</p> <p>Stakeholder engagements</p> <p>Sensitizations</p>	<p>NASSCO/SOCU</p> <p>NCTO/SCTU</p> <p>MNOs/FSP</p>	Covered by the communication cost	Covered by the communication cost
	<p>Issues on generation of e-wastes from the disposal of computers and accessories for program management as well as for ICT systems development activities of the program especially at the National and state levels.</p>	Moderate	<p>Authorization of personnel with project instruments. Implement activities provided in the developed e-waste management plan (see Annex 2)</p>	<p>Mitigation: PIU Environmental and Social Officers</p> <p>Monitoring: State Waste Management Authority</p>	<p>Mitigation: N434,000</p> <p>Monitoring: N303,800</p>	<p>Mitigation: 281</p> <p>Monitoring: 196.7</p>
	<ul style="list-style-type: none"> <li>• Social exclusion of untargeted vulnerable groups</li> <li>• Apathy due to delays caused by previous government programme, including the NASSP 1 (P151488), which may impact community and individual level support amongst stakeholders and potential beneficiaries;</li> <li>• Complaints and grievances due to selection process and service</li> </ul>	Moderate	<p>Implementation of the Communications Strategy for the Project to address issues of potential exclusion</p> <p>The existing social accountability mechanisms, including the GRM, Third Party Monitoring,</p>	<p>Mitigation: Communication Officers, GRM Officers, Gender Officers, M&amp;E Officers</p> <p>Monitoring: National level Communication Officer, PIU Environmental</p>	<p>Included in overall Project Cost</p> <p>Mitigation: N3,000,000</p> <p>Monitoring: N750,000</p>	<p>Included in overall Project Cost</p> <p>Mitigation: 1,943</p> <p>Monitoring: 485.7</p> <p>Covered by Communication</p>

delivery;

		Community Satisfaction Survey, Quarterly Cash Transfer Audit, Annual Financial Audit, and other instruments under NASSP, will continue to be used for the new Project.	and Social Officers	Covered by communication and the third-Party monitoring cost	and third-party monitoring cost
<ul style="list-style-type: none"><li>• Risk of elite capture</li><li>• potential for incorrectly identifying the poor in urban areas due to the use of spatial analysis, additionally, there may be irregular collection of detailed population data;</li><li>• difficult access for the elderly, persons with disabilities, and remote groups; difficulty for women with limited digital and financial literacy to understand and access virtual cash</li></ul>	Moderate	<ul style="list-style-type: none"><li>• Utilize existing mechanisms established under the NASSP 1 such as the GRM, Communications channels, Third party monitoring.</li><li>• Within six (6) months after Project Effectiveness, a Process Evaluation (review) of the effectiveness of the different delivery approaches (targeting, payment, social accountability mechanism, gender and social inclusion) will be captured in the M&amp;E plan of the program and will be</li></ul>	Mitigation: Communication Officers, GRM Officers, Gender Officers, M&E Officers  Monitoring: National level Communication Officer, PIU Environmental and Social Officers	Included in overall Project cost	Included in overall Project cost

			conducted under the Component 1 (urban locations) more specifically and to include component 2 as necessary, to ensure that additional social and accountability risks are not created.		
Profiling and Updating Social Register	<ul style="list-style-type: none"> <li>• Exposure to Physical Attack</li> <li>• Waring communities with land disputes are inaccessible due to hostilities</li> <li>• Flooding limits access to riverine communities during raining season.</li> </ul>	Moderate	<p>Liaise with the Security Personnel existing at the Federal and State Level per the SMP protocol</p> <p>Deploy the use of sub-project community representatives.</p>	Included in the operational cost	Included in the operational cost
Collection of Card by Beneficiaries In -Land	<ul style="list-style-type: none"> <li>• Social Conflict</li> <li>• Domestic Violence</li> </ul>	Moderate	Security Management Plan including the Journey Management Plan	Included in the operational cost	Included in the operational cost
Distribution of Card to Sub-project	<ul style="list-style-type: none"> <li>• Exposure to risk of drowning</li> <li>• Physical Attack</li> </ul>	Substantial	SEA/SHAction Plan Use of PPEs such as life jacket	TBD	TBD

Beneficiaries in Riverine Areas	<ul style="list-style-type: none"> <li>• Flooding Risk limitation</li> </ul>						
Use of electronic equipment including Computers, IPAD, printers, scanners, projectors, and other electronic Devices for Information / Data Processing	<ul style="list-style-type: none"> <li>• generation of e-wastes from the disposal of computers and accessories for program management as well as for ICT systems activities of the program especially at the National and state levels.</li> </ul>	Moderate	Implement activities provided in the developed e-waste management plan (see Annex 2)	Environmental and Social Officers	Included in the operational cost	Included in the operational cost	
Registration, Collection/Distribution of Cards	<ul style="list-style-type: none"> <li>• Project-induced SEA/SH risks perpetrated by payment service providers.</li> </ul>	Low	Implement actions provided in the SEA/SH Action Plan to address issues on potential SEA/SH risks	Monitoring: State Waste Management Authority Mitigation: Gender, GRM Officers Monitoring: National level Gender and Inclusion, GRM, Environmental and Social Officers	Cost separately in the SEA/SH Plan	Cost in the SEA/SH Action Plan	
Total cost for implementing the ESMP for the Project						Total cost for Mitigation: Embedded in Overall Project Cost N3,434,000	Mitigation: \$2,224
						Monitoring cost N1,053,800	Monitoring: \$682.4
<b>Grand Total</b>						<b>Included in overall Project Costs</b>	<b>Included in Overall Project Cost</b>
						<b>N4,487,800</b>	<b>\$2,906</b>

\*Conversion rate: N 1544. = \$1 - CBN Rate as at 27/06/2025

## 7.4 Environmental and Social Monitoring

The overall objective of environmental and social management monitoring is to ensure that mitigation measures are implemented effectively. Environmental and social monitoring will also enable response to new and developing issues of concern. The activities and indicators that have been recommended for monitoring are presented in the ESMP.

E&S monitoring will be carried out to ensure that all project activities comply with, and adhere to environmental standard provisions and specifications, to ensure that all mitigation measures are implemented.

Monitoring would be undertaken at several levels.

- i. **Internal Monitoring:** It is the responsibility of the Project Team to conduct regular internal monitoring of the project to audit direct implementation of environmental mitigation measures contained in the ESMP. The Project team should include a gender specialist experienced with gender issues. The responsibility for mitigation monitoring during the operational phase of the project will be the responsibility of the designated desk for Environmental and Social Standard issues. E&S monitoring will include the Monitoring of Accidents/Health and safety measures.

The Project management must make sure that the Project team are appropriately sensitized to the E&S standard to mitigate all identified environmental and social issues, ensure they are minimized/eliminated, and that health and safety issues are mitigated appropriately. The following parameters could be used as indicators: level of awareness of communities, staff, and stakeholders; and health and safety assessment; accident reports, etc. Records on actual accidents associated with project work.

- ii. **Waste Management Monitoring:** The Project Management and Team shall regularly monitor the management of waste; especially solid waste from electronic equipment that has become obsolete during the life of the project such as tablets, power bank, desk-top computers, lap-top computers, intercom equipment, internet equipment, and ancillary accessories.
- iii. **External Monitoring and Evaluation:** A consultant may be hired to carry out Annual Environmental Audits in line with national and World Bank requirements. At the minimum, a mid-term review and final evaluation should take place to evaluate the project – including its compliance with the ESMP. Annual reporting can be carried out directly by the Project Team or a designated consultant. The Project Team will provide the Bank with reports on environmental compliance during implementation as part of annual progress reports and annual environmental auditing reports.

The project affected persons should be represented through public participation forums to be held during the project.

Table 10: ESMP Related Consultancy Requirements

Consultancies	Duration	Project phase	Cost (₦)	Cost (\$)
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Security Risk Assessments Plan, including SMP & RCA where applicable, and incidence monitoring protocol	10 weeks	Initiation	N41,545,000	26,907
Security and Travel Management Protocols	5 weeks	Initiation	N10,000,000	6,477
E-Waste Management Plan, Guidelines and SoPs	2 Months	Initiation	N24,184,000	15,663
Total			N75,729,000	49,047

## 7.5 Institutional Strengthening & Capacity Building

Implementation of, and adherence to ESMP, is the responsibility of every member of the project team. All project personnel will be provided with the requisite training and orientation/induction to enable their active and informed participation in the ESMP. Capacity building measures will be required to ensure that stakeholders involved in developing and implementing the various ESMP components have the technical, management and other skills to fulfil their roles. The key focus areas for capacity building will be:

- An intensive two-day training/orientation for Project Team on ESMP Process, Public Communication and Consultation, compliance with relevant policies and guidelines.
- Project State Offices shall ensure that all personnel have been made aware of the ESMP. As such, the State Coordinators, the Environmental Officers, and other relevant staff shall regularly monitor compliance with the implementation of occupational health and safety requirements, waste disposal measure, Gender Based Violence and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Action Plan.
- Capacity building on Security and travel planning, occupational health and safety requirements, waste disposal measure, Gender Based Violence and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Action Plan.
- The Environmental and Social officers shall undertake the evaluation of compliance with all requirements. Where occupational health and safety, GBV & SEA/SH, Waste Disposal, etc. requirements are not being implemented, appropriate action shall be activated to assess and identify the issues, and recommendations should be made for the immediate compliance of relevant project team/personnel.

Table 11: Capacity Building Plan for the 36 participating states and FCT

Capacity need	Target participant	Duration	Facilitator	Project phase	Cost (₦)	Cost (\$)
Orientation on ESMP	E&S staff, MIS, Head of Operations	3 days	Consultant	Initiation	25,000,000	16,192
GBV & SEA/SH Orientation	All Staff, contractors, relevant	3 days	Consultant	Initiation	25,000,000	16,192

	stakeholders working on NASSP SU project					
Security and Travel Planning	All Staff contractors, relevant stakeholders working on NASSP SU project	3 days	Consultant	Initiation	25,000,000	16,192
Occupational Health and Safety	All Staff contractors, relevant stakeholders working on NASSP SU project	3 days	Consultant	Initiation	25,000,000	16,192
<b>Total</b>					<b>125,000,000</b>	<b>80,959</b>

\*Conversion rate: N 1,544 = \$1 - CBN Rate as at 27/06/2025

Refresher training on capacity building will be conducted periodically, and the project will utilize the Sustainable Procurement, Environmental and Social Standards Enhancement Project (supported by the World Bank) to help strengthen staff capacity in managing environmental and social standards within the project.

## 7.6 Environmental and Social Auditing

To promote compliance with the environmental and social issues identified in the ESMP, an E&S audit of the sub-project implementation activities shall be carried out annually when the project gets into operation phase or as required/ directed by the PIU. The objectives of the environmental auditing shall include the following.

- Ensuring compliance with environmental and social guidelines.
- Recommending areas of improvements in the current ESMP; and
- Updating database of environmental and social issues encountered on the sub project.

## 7.7 Disclosure of ESMP

After the ESMP review and clearance by the World Bank, the ESMP shall be disclosed in line with the Nigerian EIA laws for 21 days. This will include formal registration of the ESMP with the Federal Ministry of Environment (FMEnv) and receipt of guidelines for the disclosure from them. The Environmental Officer at the NASSCO is required to coordinate the disclosure process. At a minimum, this will include the following:

Table 12: ESMP Disclosure

No	Action	Remarks	Cost
1.	Registration of the ESMP at the FMEnv	This is based on fixed statutory fees by the FMEnv	₦ 50,000 \$32

2.	Inhouse technical review	This is based on fixed statutory fees by the FMEnv	₦ 200,000 \$ 129,5
3.	IMM FMEnv Statutory Cost	This is based on fixed statutory fees by the FMEnv	₦ 500,000 \$320
4.	Final Access Charges	This is based on fixed statutory fees by the FMEnv	₦250,000 \$ 162
5.	Disclosure of 2 National Newspapers	This entails advert in 2 newspapers (actual costs will be determined at the point of placing the advert and varies depending on the paper)	₦ 540,000 \$350
6.	Radio announcement of the ESMP at the state	To confirm from FMEnv	--
7.	Printing of Hard Copies for Display Centres	To confirm from FMEnv	--
8.	Disclosure at the World Bank External Website	The ESMP will be disclosed according to the World Bank Disclosure ESS 10	N/A
		<b>Total</b>	<b>₦ 1,540,000 (\$ 997)</b>

\*Conversion rate: N 1,544 = \$1 - CBN Rate as at 27/06/2025

## 7.8 ESMP Implementation Budget

The summary of the cost for the Disclosure of the ESMP is presented in Table 13. The total costs of the ESMP including costs for mitigation and monitoring and capacity building are estimated as: N 140,511,720

Building the capacity of staff who will directly be involved in implementing the project and its sub-components will enable them to monitor and respond to environmental issues in the project, while ensuring compliance with requirements of the national policies, laws and regulations and the Banks ESS.

Table 13: ESMP Budget

S/N	Item	Responsibility	Estimated Cost (NGN)	Estimated Cost (\$)
1.	ESMP disclosure	NASSCO	1,540,000	997
2.	Mitigation (per state and FCT)	NASSCO, NCTO, SOCU and SCTU	N3,434,000	2,224
3.	Monitoring (per state and FCT)	NASSCO, NCTO, SOCU and SCTU	1,053,000	6,825
4.	Capacity Building	NASSCO and NCTO	125,000,000	80,959
	<b>Total</b>		<b>N140,511720</b>	<b>\$91,006</b>

\*Conversion rate: N 1,544= \$1 - CBN Rate as at 27/06/2025

## 8.1 Stakeholder Consultation

Consultations with beneficiaries and stakeholder where community groups including representatives of groups (men, women, youth, minorities, disadvantaged groups) were carried out for the preparation of this ESMP. As part of the ESMP requirements, sample consultations were held with the beneficiaries and stakeholder where community groups including representatives of groups (men, women, youth, minorities, disadvantaged groups) from 5<sup>th</sup> January to 30<sup>th</sup> June 2022. The consultations were platforms to extract useful information, questions, and concerns relevant to the project. It also allowed project beneficiaries to contribute to both the design and implementation of the project activities. The stakeholders were provided with basic information about the project, and their significant contributions helped amplify the success of the project.

The public consultation strategy for the ESMP activities revolved around the provision of a full opportunity for involvement for all stakeholders, especially the beneficiaries.

## 8.2 Public Consultations

### 8.2.1 Introduction to Consultations Held

A series of consultations were carried out in preparing this ESMP. The first, was carried out with Project staff on the 11<sup>th</sup> of January 2022 while the second was carried out across the country with stakeholders at the state level starting from May 3<sup>rd</sup> -through 30<sup>th</sup> June 2022. All consultations held involved all relevant identified Stakeholders including community members.

The stakeholder consultations and public participation was carried out during the project preparation process and will continue even during the implementation phase to ensure regular communication between the project proponents/implementers and the various stakeholders including project's direct beneficiaries. It will facilitate regular communication and updates that will enable modifications and course correction as well as implementation of proposed mitigation measures. Stakeholder consultations and participation will also be carried out during the preparation of site-specific environmental and social impact assessments. Further consultations will be carried out during the ESMP implementation phase that will include ESMP monitoring based on the concerns that will be raised by the affected communities.

### 8.2.3 Stakeholder Identification and Analysis

For the NASSP-SU, two major group of stakeholders were identified:

- *Directly Affected Parties: this* includes all those who would be directly impacted by the project's activities.

. The directly affected parties include but are not limited to:

- Vulnerable people and populations.
- Local community members who are benefitting from the cash transfer interventions.
- Community workers (men and women); community designated nominees supporting and facilitating outreach activities
- Contracted contractors, employees, consultants, etc.

- Field Staff directly involved in supervision and monitoring.
  - Local NGOs/CSOs involved or interested in the project outcomes.
  - Financial Institutions involved with payment system and delivery.
- *Indirectly Affected Parties:* This includes other who though are non-beneficiaries, but households that will be affected by the programme.

Specifically, this category will include the following individuals and groups:

- The local population who can benefit indirectly from interventions.
- Residents and business entities, and individual entrepreneurs in the project that can benefit from resilience capacity training program or exposure to other programmes relevant to the National Social Register.
- Local vendors who can support in the delivery of the NASSP-SU.
- Local, regional and national level civil societies (CSOs) and non-governmental organizations (NGOs).
- Other government ministries and regulatory agencies at state, zonal and national levels including environmental, technical, and social development agencies.
- NASSP-SU Project employees and vendors; and
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.
- 
- *Other Affected Parties:* This includes community members who in the proposed project area who could be affected indirectly by the activities associated with the project.

#### Disadvantaged / vulnerable individuals or groups

- The vulnerable groups include:
- Those living below the poverty line
- Elderly
- Individuals with chronic diseases and pre-existing medical conditions.
- People with disabilities
- Pregnant women
- Women, girls and female headed households
- Children in deprivation
- Daily wage earners
- Unemployed and homeless
- Communities in remote and inaccessible areas
- Refugees and internally displaced people
- Migrant workers and immigrant workers

- People experiencing food insecurity
- 

#### 8.2.4 Mode of Consultation with Community

Consultations were carried out with the technical officers across several stakeholder groups from different ministries, civil society institutions and community members in every state of the federation. The consultations were preceded by the disclosure of adequate project information and environmental and social information to ensure that participants are fully informed. The consultations are conducted in the context of key project preparation steps, in an appropriate language, and in accessible places.

The affected communities and stakeholders were mainly consulted about the draft environmental and social management plan (ESMP) as a guide. Consultations were conducted mainly with the objective of ensuring that the project has broad community support, and that affected people endorse the proposed mitigation and management measures.



Photo 1: Consultative Engagement with Stakeholders in a community in Ondo State, Southwest Nigeria



Photo 2: State coordinator giving an overview of NASSP and NASSP-SU at Aguiobiri Southern Ijaw LGA Bayelsa State; South-south Zone of Nigeria



Photo 3: Stakeholders in Mbutu community in Aboh Mbaise LGA of Imo State, Southeast Nigeria



Photo 4: Stakeholders in Dekina community of Kogi State, North Central, Nigeria



Photo 5: Stakeholders in Uba and Zekun communities of Adamawa State, Northeast, Nigeria



Photo 6: Lugu Marina community of Sokoto State, North West, Nigeria

**Summary:**

There was substantial awareness among the respondents of the urgency and scope of NASSP-Scale Up, riding on the deep understanding of NASSP intervention. The perception was very positive as feedback showed that many households and stakeholders were aware of NASSP and were thus excited about the expanded scope of NASSP-SU. As such, respondents requested that the project be carried out speedily.

The participants were aware that environmental and social risks to the project, associated with Project Implementation, were low to moderate. Security risks form a substantial part of the associated risks in some geographies.

Tables 14, 15 and 16 show the outcome and discussions of all stakeholder consultations.

## 8.2.5 Outcome and Discussions from Stakeholder Consultation

Table 14: Summary of Outcome

Dates of Consultation: 5 <sup>th</sup> January to 30 <sup>th</sup> June, 2022	
Stakeholders in Attendance: State Coordinators (20 – 23 April 2022) & NASSP Staff (National)	
Locations where consultations took place: Abuja for Staff & Jos for State Coordinators	
Language: English and Local Language	
<b>Introduction</b>	
<ul style="list-style-type: none"> <li>▪ The Head of Policy and Program Development explained the relevant World Bank ESSs as well as the need for the ESMP, its objectives, composition and how these consultations will fit into the instrument being prepared. The purpose and importance of conducting the ESMP prior to commencement of the Project was also discussed.</li> <li>▪ Explanation on the important of the stakeholders' consultation at the early stage of the project design was provided.</li> <li>▪ An outline of the project scope and the stakeholders' consultation was discussed.</li> </ul> <p>This same process was carried out during the FGD. This was followed with discussions on project implementation, risk assessment and social impacts.</p>	
<b>Highlights</b>	
The stakeholders expressed appreciable knowledge of the proposed project design and happiness the project was about to commence.	
<b>Stakeholders' areas of interest</b>	<b>Response to comments &amp; views</b>
<p>During engagements with State Coordinators, the ESMP was discussed looking at the Project's potential socio-economic impacts:</p> <ul style="list-style-type: none"> <li>• What positive impacts is the project going to have?</li> <li>• How is the project going to influence social well-being as well as economic well-being?</li> <li>• The project's value addition potential?</li> <li>• What are the potential complementary initiatives or opportunities that will be created by the project, etc.</li> </ul>	<p>Information about the project objectives and deliverables and benefits were shared. Participants were informed that NASSP-SU is a safety-net programme, which will provide targeted cash transfer to 10.2 million households across Nigeria and each state quota is locked, so that no state takes more than its fair share of benefits.</p> <p>As a social assistance programme, the project is to provide a cushioning effect on shocks such as inflation, social and economic emergencies, and natural disasters.</p> <p>The targeted cash transfers can be an effective short- or long-term response option that helps aid recipients meet their essential food and non-food needs while also supporting households to achieve stability and resilience over time, as well as aid growth in local economic activities through and ecosystem interaction between beneficiaries and vendors in their communities.</p>

Table 15: Summary of the Outcome of Training and Consultations State Teams

Date of Consultation: 5 <sup>th</sup> January – 30 <sup>th</sup> June, 2022	
Stakeholders in Attendance: State Environment and Safeguard Officers; GRM Officers; Gender and Social Inclusion Officers;	
Locations where consultations took place: Colossus Hotel, Ikeja, Lagos	
Language: English	
<b>Stakeholder's comments and views</b>	<b>Response to comments &amp; views</b>

<p>Stakeholder’s comments/questions included:</p> <ul style="list-style-type: none"> <li>• What positive impacts is the project going to have?</li> <li>• How is the project going to influence social well-being as well as economic well-being?</li> <li>• The project’s value addition potential?</li> <li>• What are the potential complementary initiatives or opportunities that will be created by the project, etc. etc.</li> </ul>	<p>Some of the responses are like table 13 above:</p> <p>The targeted cash transfers can be an effective short- or long-term response option that helps aid recipients meet their essential food and non-food needs while also supporting households to achieve stability and resilience over time, as well as aid growth in local economic activities through and ecosystem interaction between beneficiaries and vendors in their communities.</p> <p>Safe as above but more specifically through the targeted cash transfer, household consumption can be improved thereby providing households with an opportunity to improve household wellbeing by improving household decisions around what to use the cash for.</p> <p>The project value addition in the short-term is to cushion the effects of shocks, and in the long run, it is to achieve resilience and improved household decision making on consumption and social capital, reduce asset disposals during dire times, reduce negative behavioural habits associated with scarcity mentality.</p> <p>Through the identification of poor and vulnerable households, the opportunity for appropriated targeting could be made more effective and programme delivery mechanisms could be delivered more efficiently.</p> <p>Other programmes could complement interventions to achieve complementarities of interventions in such a way that households could be lifted out of poverty.</p> <p>The NSR and the RRR, and Unified Register of Beneficiaries (URB) could be disaggregated to allow for effective targeting of different interest groups.</p>
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**Table 36: Summary of the Outcome of Consultations with Community Members**

Date of Consultation: 5 <sup>th</sup> January – 30 <sup>th</sup> June, 2022				
Stakeholders in Attendance: Community Members across Project States				
Locations where consultations took place: Various Community stakeholders across the Country				
Language: English & Local Language				
<b>Introduction</b>				
<ul style="list-style-type: none"> <li>▪ The State Coordinators explained the relevant World Bank ESSs as well as the need for the ESMP, its objectives, composition and how these consultations will fit into the instrument being prepared. The purpose and importance of conducting the ESMP prior to commencement of the Project was also discussed.</li> <li>▪ Explanation on the important of the stakeholders’ consultation at the early stage of the project design was provided.</li> <li>▪ An outline of the project scope and the stakeholders’ consultation was discussed.</li> <li>▪ This same process was carried out during the FGD. This was followed with discussions on project implementation, risk assessment and social impacts.</li> </ul>				
<b>S/ N</b>	<b>Sampled State/Zon e</b>	<b>Comments/Questions</b>	<b>Suggestions</b>	<b>Comments and Reactions</b>

**MEN, women and Vulnerable Groups and Youth**

**Summary:**

There was substantial awareness among the respondents on the urgency and scope of NASSP-Scale Up, ridding on the deep understanding of the NASSP intervention. The perception was very positive as feedback showed that many households and stakeholders were aware of NASSP and were thus excited about the expanded scope of NASSP-SU. As such, respondents requested that the project be carried out speedily.

There was also the understanding that there was no adverse risk from the project, even as participants were aware that environmental risk to the project, associated with security may be substantial in some geographies.

1	SW: Ondo	<ul style="list-style-type: none"> <li>Appreciated the program design and scope.</li> <li>Concerned that the project is a short-term measure and may not be able to lift people out of poverty due to scope of benefits.</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholders called for speedy execution and linkage with other programmes that can extend support for the poor</li> </ul>	The State Coordinator explained that the essence of the consultation is to inform them on the intended project and its scope, and to manage expectations.
2	SS: Bayelsa	<ul style="list-style-type: none"> <li>Scope of the Project was understood and appreciated.</li> <li>Youth restiveness is a major concern, and they wondered how the project could help youth seek gainful opportunities with other schemes other than NASSP-SU</li> </ul>	<ul style="list-style-type: none"> <li>Suggested that NASSP-SU should facilitate youth engagement with FG NPOWER programme.</li> </ul>	The State Coordinator emphasized that the project was a shock-responsive social protection program and agreed to escalate the request to the National HQs to support the aspiration of the community.
3	SE: Imo	<ul style="list-style-type: none"> <li>Understood the scope of the project and the benefit.</li> <li>Concerned that security within the state and region might affect the project performance</li> </ul>	<ul style="list-style-type: none"> <li>Security issues under the ESMP should be well activated to ensure project benefit get to the right people.</li> <li>Create synergy among all the stakeholders involved with security from the community to the state security institutions</li> </ul>	The State Coordinator emphasized that the issue of security is a common concern and requires all stakeholder's involvement. He noted that the stakeholders should work with the project to ensure the safety of staff so that they can be well served.
4	NC: Kogi	<ul style="list-style-type: none"> <li>The scope of the project was well appreciated,</li> <li>Stakeholders emphasized the need to expand the coverage of the program and increase benefit values.</li> </ul>	<ul style="list-style-type: none"> <li>Suggested that the state Quota should be increased.</li> </ul>	The State Coordinator explained that: <ul style="list-style-type: none"> <li>It was explained to the community that each State has a quota, which is based on their poverty head count and exposure to shocks.</li> <li>Regarding the benefit value, which was determined by the available resources and increasing it will mean reducing the coverage.</li> </ul>

5	NE: Adamawa	<ul style="list-style-type: none"> <li>◦ Stakeholder wondered if the benefits could be deducted to cover for health insurance</li> </ul>	<ul style="list-style-type: none"> <li>◦ Suggested that cash transfer should also cover payment for health insurance.</li> </ul>	The State Coordinator informed the stakeholders that their suggestion was laudable, and he would pass the message to a national team for consideration.
6	NW: Sokoto	<ul style="list-style-type: none"> <li>◦ Stakeholders Appreciated the project objectives and intended beneficiaries. Expressed awareness about the closing project and the benefit it brought to the beneficiaries.</li> <li>◦ Expressed concerns about the worsening security situation of the communities and increasing levels of poverty due to inability to farm or evacuate farm products due to banditry across most of the rural areas.</li> </ul>	Sought more support for the people of the state to help them maintain their livelihoods.	The State Coordinator noted that though the project cannot cover all identified poor and vulnerable people, he expressed readiness to ensure that the government is aware of their request and that other schemes are made available to support them.

Annexures: Technical Annexes to support the ESMP Implementation

## Annex 1: Labour Management Procedures

### 1.0 Labour Management Procedures

This Labour Management Procedure (LMP) has been prepared for the NASSP-SU to ensure compliance with Environmental and Social Standard 2 (ESS 2) on Labour and Working Conditions. Accordingly, the purpose of this LMP is to facilitate the planning and implementation of the identified labour requirements, the associated risks, and the procedures and resources necessary to address project related labour issues. This LMP sets out general guidance relevant to labour risks including targeting and enrollment of beneficiaries; financial management service and technical support; monitoring and evaluation; capacity building on environmental and social risk management and cross learning experience sharing.

The LMP will be reviewed continually during implementation and adequate measures and procedures to manage negative impacts will be put in place.

### 1.1 Objectives of LMP

The LMP is developed taking into consideration the ESS 2 which specifies the requirements for the management of labour and working conditions. The LMP seeks to achieve the following specific objectives:

Establish arrangements to appropriately manage and protect the Occupational Health and Safety (OHS) and welfare of workers including both employees, vendors and others who may be exposed to risks associated with the targeting, enrollment and financial service activities.

- Ensure that employees understand their rights in relation to labour and working conditions.
- Allow employees to exercise their right to freedom of association and collective bargaining.
- Provide employees and contractors with a feedback mechanism for them to raise

feedback, concerns, complaints and grievances and to receive information on the response and any associated corrective action.

- Prevent discrimination in hiring, remuneration, access to training – on the grounds of race, national or social origin, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age, and promote equal opportunities.
- Manage disciplinary practices and grievances in a manner that treats those affected individuals with respect and dignity and without threat, abuse or ill-treatment.
- Ban the use or support of children, forced or compulsory labour in direct operations and in the supply chain.

## 1.2 Scope of Labour Management Procedures

The LMP describes the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labour and working conditions, including camp accommodation. It covers all categories of workers but only partially covers government workers/civil servants working in connection with the NASSP-SU except if there is a legal transfer of their employment or engagement. The LMP will set out the following procedures

- Overview of labour use on the project.
- Assessment of key potential labour risks
- Brief overview of labor legislation (Terms and conditions).
- Brief overview of labor legislation (Occupational Health and Safety)
- Responsible Staff
- Policies and procedures
  - o Age of employment
  - o Terms and Conditions:
  - o Grievance Mechanism
- Contractor Management.
- Primary Supply Workers.
- Etc.

## Section 2: Overview of Labour use in NASSP-SU

This Section examines the LMP with respect to the NASSP-SU Programs to ensure compliance with Environmental and Social Standard 2 (ESS 2) on Labour and Working Conditions of the World Bank's Environmental and Social Framework (ESF) and the national legislation and regulations of the Government of Nigeria. Accordingly, the purpose of this LMP is to facilitate the planning and implementation of the project by identifying the main labour requirements, the associated risks, and the procedures and resources necessary to address the project-related labour issues. The LMP sets out general guidance relevant to different forms of labour but also issues and concerns that relate to NASSP-SU project considerations.

## 2.0 Types of Workers

NASSP-SU programme activities will include different categories of workers, who will be engaged in different activities. Regarding ESS2, the workers required for the programme can be classified into the following three groups: direct workers, contracted workers and primary supply workers. The three categories of workers relevant to the delivery of the NASSP-SU are described below.

**a) Direct workers**

This category of workers will comprise a mix of government civil servants from various relevant line ministries and those deployed as technical consultants” – full and part-time by the NASSP-SU and State Offices under the programme. Direct workers will comprise project staff hired as consultants; and Ministry staff seconded from the civil service. NASSP-SU will be implemented by NASSCO and NCTO. The requirements of paragraphs 9 to 30 of ESS2 will apply to direct workers.

These officers are found at NASSCO and NCTO and they will serve at top management and in leadership positions: National/Project Coordinator, Technical Officers, Procurement Officer, Internal Auditor, Accountant, Financial Officer, Monitoring & Evaluation/MIS Officer, Gender Officer, Environmental Safeguard Officer, Social Safeguard Officers and Communications Officer, etc. The composition of the State project implementation units (SPIU) will be determined by responsibility at State level.

**b) Contracted workers**

Two broad categories of contracted workers are expected. First are consultant service providers who will provide implementation support services to the NASSCO/NCTO and SPIU. Second, the staff of contractors, suppliers, and contractors to be subcontracted to arrange for technical and other works.

**c) Primary Supply Workers**

The NASSP-SU Team must ensure that any contractors or suppliers engaged in working on this Project have sound environmental standards and management practices in place. Therefore, all suppliers to the NASSP-SU project must be assessed to ensure compliance with the required environmental and social management standards. The assessment should be embedded in the tendering, hiring and contracting processes, and any due diligence measures required in the sourcing of supplies for the NASSP-SU activities. Periodic mandatory training of all workers on SH/SEA issues and Code of Conduct. The contractor shall develop a Gender Based Violence (GBV) Action Plan including an Accountability and Response Framework to be included in the contractor ESMP. T2.1 Characterization of Labour requirements

Given the nature of NASSP-SU activities, the workforce will comprise both skilled and unskilled labor, technical staff, community representatives and government civil servants. States and local governments will also hire community workers (with priority on female workers) and propagating codes of conduct and ethics that would help make workplace more welcoming and supportive of female workers.

**2.2 Project Implementation Schedule and Activities**

The direct workers will be required full time and year around for the NASSP-SU duration. Consultants will also require work full-time and on an intermittent basis. The workers that will be required for the upgrading wet market to function safely will be required, as per the need.

Type of workers	Jobs performed under the project
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Direct Workers	National/Project Coordinator, Technical Officers, Procurement Officer, Internal Auditor, Accountant, Financial Officer, Monitoring & Evaluation/MIS Officer, Gender Officer, Environmental Safeguard Officer, Social Safeguard Officers and Communications Officer, etc. at the Federal and State Levels – Roles and Responsibilities can be found in the Project Implementation Manual.
<b>Contracted workers</b>	Consultant service providers who provide implementation support services to the NASSCO/NCTO and SPIU and staff of contractors, suppliers, and contractors to be subcontracted to arrange for technical and other works.
<b>Primary Supply Workers</b>	Contractors or suppliers engaged to work on this Project.

**Section Three: Key Potential Labour Risks & Mitigation Measures**

**3.0 Introduction**

This section examines the potential labor risks and mitigation measures associated with the NASSP-SU.

**3.1 Potential Risks and Impacts**

Majority of the activities in the NASSP-SU will require the use of ICT systems in managing office operations, procurements and processing of applications, data and information management and during data systems upgrade.

It is also recognized that, during implementation of the Project, interactions in the office environment and at field level may pose a certain level of occupational, health and safety risks especially in situations involving epidemics of public health interest. This risk could be pronounced, especially if proper hygiene, safety precautions and social distancing measures are not adhered to by all personnel. To mitigate or prevent the risks associated with such diseases, the Project Implementation Units and all contractors will follow, and apply the NASSP-SU guideline /protocol on PPE for all workers. The Project will also ensure provision of basic handwashing/sanitation facilities including temperature testing equipment at all point of entry to the office and promote use of face mask/ shield where social distancing cannot be achieved.

**3.1.1 The identified potential risks and impacts**

The identified risks and impacts in the Labour Management procedures are as follows:

Key Potential Risks.

- Exploitative wages due to keen desire to get jobs
- Overtime and excessive working hours without compensation and break periods
- Grievances from Gender-Based Violence

- Poor working conditions (unsafe work environment, lack of workers' rights, etc
- Possibility of forced labour and child labour
- Inequality during recruitment and discrimination against women, girls and vulnerable people
- Inadequate provision of Personal Protective Equipment (PPE) in relation to safety requirements
- Delay in payment of remuneration fees, wages, stipends, salaries etc for consultants and project workers
- Unfair recruitment practices
- Potential risk of exposure to communicable diseases/infection
- Increase in incidents and accidents during project implementation
- Inadequate or non-existence of compensation plan for accidents victims

### **3.2 Labour Management Plan**

To have a well-defined plan for mitigating some of the potential risks above, Table 3.1 outlines the Labour Management Plan. The NASSP-SU will be responsible for the monitoring and implementation of this LMP while the SPIUs and contractors will key into this LMP.

Table 4: Labour Management Plan

Potential Risks	Mitigation Measures	Monitoring Actions	Responsibility
<b>LABOUR RISKS</b>			
<b>Exploitative wages due to keen desire to get jobs</b>	Program workers will be paid on a regular basis as required by national law and labour management with a principle of “equal pay for equal work”	Salary/Remuneration Pay-slip	NASSCO/NCTO
<b>Over-time and excessive working hours without compensation and break periods</b>	Design and implement Human Resource policies and procedures which should include guidelines with respect to: Minimum Wage; Minimum age of workers; working hours, contracting terms, leave, equality and diversity, collective bargaining, hiring, working conditions; provision of PPEs; recruitment etc.  Train workforce on all HR policies and protocols, labour standards and ensure workforce understand their terms and conditions prior to engagement	Presence of HR Policy  Random Sampling of workers who understand their terms and conditions of engagement  Record of Trainings on HR Policy and Protocols  Number of trainings organized	NASSCO/NCTO
<b>Grievances from Gender-Based Violence (GBV)</b>	Train workers on GBV (SH/SEA risks) and ensure that they understand all protocols prior to engagement  Implement existing program GRM	Number of workers who received training  Number of GBV complaints and number addressed Implementation of GBV Plan	NASSCO/NCTO
<b>Poor working conditions (unsafe work environment, lack of workers’ rights, etc</b>	Workstations must be conducive such as good sanitation facilities separate for male and female, well-ventilated rooms, basic amenities (good ergonomics)	Presence of good workstations / with adequate supply of basic amenities Regular monitoring of workstations	NASSCO/NCTO

Potential Risks	Mitigation Measures	Monitoring Actions	Responsibility
	All program workers will be provided with adequate periods of rest per day (break periods) sick leave, maternity leave as required by national law. Ensure that workstations, common areas are routinely cleaned and organized with appropriate signage in place and that grounds are maintained	Number of issues raised and addressed	
<b>Forced Labour</b>	Design and implement Human Resources Policies and Protocols in line with the requirement of Nigeria's Labour Act and ESS 2  Procurement will ensure that no forced Labour exists in the program by developing terms of reference for all engaged staff (consultants/contract staff) gathering documents and appropriate proof.  A consent section will be part of the employee signed employment contract. Contractors will ensure that if Labour is sourced from any subcontracting agency, the workers are not subject to coercion and forced Labour conditions.  Provide complaint box	Number of complaints received  Number of complaints resolved  Evidence of Terms of Reference	Procurement Unit within NASSCO/NCTO
<b>Child Labour</b>	The minimum age of sixteen (16) years will be enforced at recruitment.	Absence of minors within the workforce	NASSCO/NCTO Contractor
<b>CONTRACTED WORKERS</b>			
<b>Community grievances and social threats</b>	Develop, train and implement Workers' Code of Conduct  Assess to project GRM	Number of workers that received induction on code of conduct and GBV.  Number of Grievances received  Signed Code of Conduct	NASSCO/NCTO

Potential Risks	Mitigation Measures	Monitoring Actions	Responsibility
	<p>Develop and train workforce on Grievance Redress Mechanism</p> <p>Monitor adherence to Code of Conduct.</p>	Number of GBV cases reported and resolved	
<b>Inequality during recruitment and discrimination against women, girls and vulnerable people</b>	<p>The program should ensure non-discrimination in staff recruitment.</p> <p>The employment of program workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, hiring and compensation</p>	<p>Total number of staff employed</p> <p>Number of women employed</p>	NASSCO/NCTO
<b>Unfair recruitment practices</b>	<p>Develop pre-qualification screening procedure for all consultants/contractors and suppliers</p> <p>NASSP-SU PIUs should follow the in-country procurement procedures</p> <p>Enlist the assistance of a professional procurement consultant Potential consultants/contractors should be verified by the concern party from the World Bank Team.</p> <p>The Task team of the Bank should closely supervise the Contractor Recruitment Plan and ensure fairness of Employment Terms and Conditions against the applicable and prevailing National regulations</p>	<p>Number of contractors prequalified</p> <p>Number of Procurement Consultant engaged</p>	<p>NASSCO/NCTO</p> <p>Task Team from the World Bank</p>
<b>OCCUPATIONAL HEALTH &amp; SAFETY RISKS</b>			

Potential Risks	Mitigation Measures	Monitoring Actions	Responsibility
<b>Poor working conditions, inadequate attention to occupational risk.</b>	<p>Implement and ensure workers understand the programme health and safety plan</p> <p>Provide and train workforce on hazards and environmental risks</p> <p>Provide masks, helmets, gloves, safety shoes, first aid kits, and OHS training,</p> <p>Access to toilets, potable water, rest areas, and hygiene facilities.</p> <p>Ensure Fair Employment Terms such as Written contracts, regular payment, working hours, leave entitlements</p> <p>There must be Equal opportunity in hiring, training, and promotion, no discrimination or harassment, No employment of children labor and no forced labor.</p> <p>Conduct training and ensure Safe, hygienic, and comfortable living conditions (if provided) and Zero tolerance for harassment, abuse, or discrimination</p>	<p>Number of sensitizations sessions held across thematic areas</p> <p>Number of staff trained across thematic areas</p>	NASSCO/NCTO
Accident/Incident by workers using motorbikes	PPEs for field workers using motorbikes	Documentation of numbers of PPEs procured, and pictorial evidence of effective usage.	NASSCO/NCTO
Accident/Incident by workers including those using boats	PPEs for field workers using boats or canoes, and helmets for motorbikes, and speed limits for vehicles	Documentation of numbers of PPEs procured, and pictorial evidence of effective usage.	NASSCO/NCTO
<b>Possibility of forced and child labour</b>	Develop worker engagement procedure	Workers Engagement Procedure Developed	NASSCO/NCTO E&S team

Potential Risks	Mitigation Measures	Monitoring Actions	Responsibility
<b>COMMUNITY HEALTH &amp; SAFETY RISK</b>			
<b>Spread of communicable diseases</b>	<p>Ensure periodic update and sensitization on communicable diseases of national interest, and other emerging epidemics published periodically by the CDC.</p> <p>Implement staff periodic medical/health surveillance and testing for communicable diseases.</p>	<p>Number of Notifications and/or sensitizations held that are linked to CDC publications of public health interest.</p> <p>Number of staff examined or submitted required medical certificate</p>	NASSCO/NCTO E&S team
<b>Non-existence of compensation plan for accidents victims</b>	<p>Avail staff of the awareness of program compensation policy</p> <p>NASSP-SU must ensure they follow the Labour Act and Compensation Plan for accident victims</p>	Number of awareness workshops conducted and participants	NASSCO/NCTO E&S team
<b>Grievances and social threats</b>	<p>Ensure the strict implementation of Labour Management Plan to minimize social unrest. Contractors should be hired through a systematic process.</p> <p>Ensure the GRM is functional and available to everyone</p>	Number of complaints reported and addressed	NASSCO/NCTO

### 3.3 Gender Based Violence

Gender Based issues have been receiving global attention. Nigeria’s diversity and distinct socioeconomic, cultural and political contexts across the geopolitical regions and states results in different gender related vulnerabilities. While gender inequitable norms prevail throughout the country, these vary by region and interact with other structural, community and individual factors exposing women, girls and boys to some forms of GBV more than others. The socioeconomic status of women and girls in the northern zones lags those in the south: only 3 percent of girls in the North complete secondary school, over two-thirds aged 15-19 years are unable to read compared to less than 10 percent in the South, and 76 percent are married by age 18 in the northwest part of Nigeria. Efforts will be made to ensure that the GBV principles are implemented throughout the life cycle of the NASSP SU programme.

#### Manifestations of GBV in the Workplace

The act of violence manifests itself in several ways in the workplace. To properly understand the act of violence or its manifestation, one must consider whether the act reflects and/or reinforces unequal power relations between males and females. Many—but not all—forms of GBV are criminal acts in Nigeria laws and policies such as:

- a. Physical Violence (such as slapping, kicking, hitting or use of weapons)
- b. Emotional abuse (such as systematic humiliation, controlling behaviour, degrading treatment, insults, and threats).
- c. Sexual violence, which includes any form of non-consensual sexual contact, including rape.
- d. Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person).

## Section Four: Brief Review of Labour Legislation

### 4.0 Introduction

This section outlines relevant labour laws, policies and regulations that are applicable within the scope of work in accordance with Nigeria and the World Bank requirement for this program. These requirements are seen in the sub-sections below:

#### 4.1 Labour Policy Institutional Framework

The Federal Ministry of Labour and Employment (FML&E) has the authority and capacity to ensure appropriate labour management in the country; its institutional framework is adequate to accommodate and oversee the implementation of requirements under the World Bank’s ESS 2 – Labour and Working Conditions. Table 4.1 provides an overview of the relevant department within the FML&E

Table 4.1: Summary of Relevant Departments within the FML&E

Department	Functions
The Inspectorate	The Department is charged with the responsibility of ensuring compliance with all national and international Labour legislation connected with terms and conditions of employment, promotion of health and safety and sustenance of industrial peace and harmony. The department is also charged with the protection of children from child Labour especially in its worst forms.

Department	Functions
The Social Security Department	The establishment of Social Security Department is to promote a coordinated and holistic approach to social security. The policy drafted by the NWC was in line with the International Labour Organization (ILO) Convention 102, to provide a framework for international best practices based on set minimum standards. The policy is expected to provide the poor, weak and vulnerable an equitable access to medical care, employment, maternity care, survivors' benefits, etc. The department collaborates with relevant stakeholders to regulate a well-focused, coordinated and effective National Social Security System
Employment and Wages	<p>The Department is charged with the responsibility of initiating and implementing the employment and wages policies of the Federal Government of Nigeria and has the following functions:</p> <ul style="list-style-type: none"> <li>Formulation and implementation of employment policies.</li> <li>Registration and placement of unemployed applicants; Employment Exchanges</li> <li>Professional and Executive Registries; National Electronic Labour Exchange</li> <li>Coordination of Decent Work Country Program</li> <li>Wages administration through; Wages Monitoring</li> <li>Processing of Collective Agreements; Issuance of Recruiter's Licenses. Labour migration management; Initiating and implementing programs on active aging</li> </ul>
	Oversight functions over National Directorate of Employment
Office of the Registrar of Trade Union	<p>The office is a unit in the Trade Unions Services and Industrial Relations Department, a statutory office created by Section 45 of the Trade Union Act CAP T8 LFN 2004. The Registrar has the primary responsibility for the effective administration of the Trade Unions Act. Hence, the office of the registrar of Trade Unions has the following specific responsibilities:</p> <ul style="list-style-type: none"> <li>Registration of trade unions; Cancellation of certificate of registration of trade unions; Supervision of trade unions account:</li> <li>Issuance of guidelines and circulars to registered unions, highlighting observed shortcomings in their obligations under the provisions of the Trade Unions Act for effective administration of the registered bodies. Promotion of workers educational programs through lectures at trade unions organized seminars, workshops, symposia and conferences. Maintenance of records of registered offices, documents and particulars of registered unions.</li> <li>Attendance to courts in respect of relevant Trade Union matters.</li> <li>Collection of statutory fees as revenue for the government and paying same into the government coffers.</li> </ul>

Department	Functions
Occupational Health and Safety	<p>The Factory Inspectors under the department are responsible for the enforcement of Factories Act 1990, Cap 126 Law of the Federation of Nigeria. They also oversee the implementation of several other subsidiary legislations, which provide for the safety, health and welfare of workers in all workplaces nationwide. The enforcement of Factories Act is done through:</p> <ul style="list-style-type: none"> <li>• Registration of new factory premises, renewal of certificate of registration and amendment or revocation of certificate of registration.</li> <li>• Special Inspection of workplaces; Prosecution of recalcitrant occupiers, Investigation of accidents, dangerous occurrences and occupational diseases.</li> <li>• Preparation of safety and health regulations, code of practice, guidelines and standards for various operations, processes and hazardous agents. Provision of occupational safety and health education to workers and employers.</li> <li>• Recording and dissemination of information and statistics on all aspects of occupational safety and health through the national Occupational Safety Health Information Centres (CIC).</li> <li>• Provision of technical assistance and advisory services to workplaces on HIV and AIDS interventions.</li> </ul>

Specifically, the ministry has various laws for protecting all employees, of relevance to NASSP-SU and LMP is the Labour Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004: This Act covers general provisions including:

- Protection of wages
- Contracts of employment and terms and conditions of employment
- Fair treatment and equal opportunities for project workers.
- Hours of work and overtime
- Employment of women
- Labour health matters
- Prohibition of forced labour
- Labour complaints

## 4.2 Relevant Federal Labour Policies

### 4.2.1 The Labour Act 2004

As indicated above, the following terms and conditions under the Labour Act are described in detail below in relation to the Technical Assistance provided in this programme.

- **Protection of Wages:** the wages of all project workers shall be made payable in legal tender or with prior consent of both parties in cheque and not otherwise. Wages shall become due and payable at the end of each period for which the contract is expressed (daily, weekly or at such other period as may be agreed upon), provided the period is

not more than one month, the wages shall become due and payable at intervals not exceeding one month.

- **Contracts of Employment, Terms and Conditions of Employment:** no employer shall make any deductions or make any deductions from wages to be paid to project workers. An employer may, with the consent of a project worker, make deductions except with consent of the worker in terms of VAT, TAX, pension funds or other schemes as agreed by the worker and approved by the State Authority. Not later than three months after the beginning of a project worker's period of employment with an employer, the employer shall give to the worker a written statement specifying- (a) the name of the employer or group of employers, and where appropriate, of the undertaking by which the worker is employed; (b) the name and address of the worker and the place and date of his engagement; (c) the nature of the employment; (d) if the contract is for a fixed term, the date when the contract expires
- **Hours of work and overtime:** this shall be in line with federal government regulations and as may be stipulated by the programme management at the federal level. However, being a project environment, the normal working hours shall be from 8am to 5pm with one hour interval for break period.
- **Benefits:** project workers shall be entitled to holiday with full payment of wages after twelve months of continuous service including sick leave.

#### 4.2.2 Occupational Health and Safety

Based on NASSP-SU programme, it is envisaged that most of the risks are occupational, and gender based. The requirements of the ESS2 on Occupational Health and Safety are to carry out risk assessments and develop appropriate risk prevention and mitigation measures. The OHS measures herein will be summarized based on country's OHS legislation and the Environmental and Social Guidelines (ESHG) of the World Bank Group.

Should the Nigeria's OHS guideline differ from the ESHG (World Bank Guidelines), then the more stringent one should be applied. However, if the less stringent guideline is chosen or more appropriate measures than those provided in this ESH Guideline below probable based on specific project circumstances, a full and detailed justification for any proposed alternatives should be provided by the proponent as part of the site-specific environmental assessment. This justification should demonstrate that the choice for any alternate performance levels is protective of human health and the environment.

Table 4.2: Nigeria Occupational Health and Safety

Sector	Potential Impacts	Parameter Guideline
OHS	OHS Incidents, Accidents or death	An employee is entitled to payment of compensation with respect to any accident sustained while at work or on official assignment.  In every case of an injury or disabling occupational disease to an employee in a workplace, the employee, or in case of death the dependent, shall within 14 days of the occurrence or receipt of the information of the occurrence, inform the employer by giving information of the disease or injury to a manager, supervisor, first-aid attendant agent in charge of the work where the injury occurred or other appropriate representative of the employer. Failure to provide the information required will bar claim for compensation

Poor working conditions, inadequate provision of Personal Protective Equipment (PPE)	Develop and Implement OHS plan and ensure workers understand their terms of engagement and rights  Provide and train workforce on usage of PPE
Physical Injuries	Suitable protective clothing and appliances, including, where necessary, suitable gloves, footwear, goggles and head coverings, shall be provided and maintained for the use of such workers.
Inadequate or nonexistence of compensation plan for accident victims	Implement and train workers on the HR Policies  NASSP-SU/ must ensure they follow the Labour Act and Compensation Plan for accident victims
Grievances and social threats	Ensure the strict implementation of Labour Management Plan to minimize social unrest. Staff should be hired through a transparent and competitive process.
	Develop and train workers on emotional intelligence, Interpersonal relations and stakeholders' management.
Fire Incidents	The project buildings shall be designed and operated in full compliance with local building codes, local fire department regulations, local legal/insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard
Possibility of forced and child labour	Develop worker engagement procedure and follow the HR Policy
Fear of Occupational Health and Diseases,	Develop, train and Implement protocols for workers on incident Prevention and Control (IPC) communicable diseases, regular awareness and sensitization on work-related lifestyle diseases.
waste generation	Establish waste management priorities at the onset of activities based on an understanding of potential hazard associated with the waste.  Project workers shall ensure and practise reuse and reduction of papers and other recyclable waste materials.  All waste generated should be collected and disposed using the best environmental technology

#### **4.2.3 Other Federal Legislation**

**Factories Act, 1990:** The 1990 Factories decree is a landmark legislation in occupational health in Nigeria. It provides a substantial revision of the colonial legislation, Factories Act 1958, in which the definition of a factory was changed from an enterprise with 10 or more workers to a premise with one or more workers thereby providing oversight for the numerous small-scale enterprises that engage most of the workforce in Nigeria. It stipulates the enforcement of compliance on factories, industries and organizations that employ labour on the protection of the right of workers to friendly environment, health and safety.

#### **Factories Act, Cap F1, LFN 2004: The Act –**

- Provides a legal framework for the regulation of safety standards for the operation of factories in Nigeria; and
- Sets out minimum standards for clean and conducive working environments.

**Worker's Compensation Act (2010):** The Act provides compensation to employees who suffer from occupational diseases or sustain injuries arising from accidents at workplace or in the course of employment. Payment of compensation (to the worker or to his dependents in case of death) by the employer is rooted in the accepted principle that the employer has a duty of care to protect the health, welfare and safety of workers at work. The specific amount will be determined by the programme management at the federal in consultation with the World Bank.

**National Minimum Wage Act, 2010:** National minimum wage in Nigeria is determined by the Government. Government is empowered to set up "industrial wages boards" for specific sectors or geographical areas where it considers wages to be "unreasonably low" or where there is no adequate collective bargaining machinery for the effective regulation of wages or other conditions of employment of those workers. Generally, wage rates are determined by the applicable collective agreement or the agreement between the worker and the employer. Section 15 of the Labour Act states that wages shall become due and payable at the end of each period for which the contract is expressed to subsist (daily, weekly, monthly or at such other period as may be agreed upon) provided that where the period is more than one month, the wages become due and payable at intervals not exceeding one month. The recently agreed minimum wage in-country is N70,000/month.

#### **4.3 The World Bank Environmental and Social Standards**

The World Bank has in place several environmental and social safeguards standards, which are aimed at preventing and mitigating undue harm to people and their environment in any development projects involving the Bank. The Bank recently approved the new Environmental and Social Framework which consists of ten standards of importance to this program is ESS 2: Labour and Working Conditions. They are designed to help ensure that projects proposed for Bank financing are environmentally and socially sustainable.

#### **Environmental and Social Standards (ESS 2)**

ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. The ESS 2 provides that the Borrower (in this instance, the Federal Government of Nigeria) shall promote sound employee management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives are as follows:

- To promote safety and health at work
- To promote the fair treatment, non-discrimination and equal opportunity of project workers
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate
- To prevent the use of all forms of forced Labour and child Labour.
- To provide project workers with accessible means to raise workplace related concerns, grievances etc.

#### **4.3.1 World Bank Environmental, Social and Health Guidelines (ESHG)**

The OHS measures will be designed to address identification of potential hazards to project workers (Direct, Contracted and Consultants) particularly those that may be life threatening; provision of preventive and protective measures via modification, substitution or elimination of hazardous conditions; training of project workers; emergency prevention and preparedness and response arrangements to emergency situations; documentation, reporting and remedies of accidents and incidents.

The following guidelines should be adhered to:

- Identify all occupational hazards and associated risks as early as possible for programme life cycle.
- Involve ESH professionals, who have the experience, competence, and training necessary to assess and manage ESH impacts and risks
- Conduct risk assessment to understand the likelihood and magnitude of ESH risks associated with this project based on whether the project will involve hazardous materials or processes; the potential consequences to workers, communities, or the environment if hazards are not adequately managed, which may depend on the proximity of project activities to people or to the environmental resources on which they depend
- Prioritize risk management strategies with the objective of achieving an overall reduction of risk to human health and the environment.
- Favour strategies that eliminate the cause of the hazard at its source, for example, by selecting less hazardous materials or processes.
- When impact avoidance is not feasible, incorporate engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants to workers or environments.
- The OHS performance should be monitored.

Table 4.3: Comparison Between ESS 2 and Nigeria Labour Legislation

Areas	Nigeria Labour Legislation	ESS2: Labour & Working Conditions	Identified GAPS	Measures to Address Identified Gaps
<b>Minimum Age</b>	Sixteen Years and above	Fourteen years and above	The disparity in age of engagement	The Nigeria Labour legislation is preferred in this instance. However, Birth Certificate or Sworn Affidavit should be used for screening and confirmation of age labour
<b>Forced Labour</b>	Any person who requires any other person, or permits any other person to be required, to perform forced labour contrary to section 34 (1) (c) of the Constitution of the Federal	All work associated This project shall be performed voluntarily without coercion or any form of threats. Forced labour in this context can be any form of indentured labour.	Both Condemn forced labour	There should be periodic Screening Checks and Monitoring for Forced Labour.
	Republic of Nigeria 1999 shall be guilty of an offence and on conviction shall be liable to a fine not exceeding N1,000 or to imprisonment for a term not exceeding two years, or to both.			
<b>Protection of Wages</b>	Wages shall become due and payable at the end of each period daily or weekly.  No employer shall make any deduction or make any agreement or contract with a worker for any deduction from the wages to be paid by the employer	Same	Both protect Worker wages.	There should be An Effective Grievance Redress Mechanism for Complaint that may arise because of irregularities in wages payment by the employer.

<b>Nondiscrimination and Equal Opportunity.</b>	There is no defined Labour management procedure to guide developmental projects	The standard recognizes that the project will make use of various categories of workers, direct and indirect workers such as contract staff and primary suppliers.	The ESS2 provides a unified approach while the National Labour legislation does not.	NASSP-SU Programme will implement the ESS2 and ensure that nondiscrimination and Gender Issues are implemented.
<b>Hours of Work</b>	Working hours shall be agreed mutually or by collective bargain	Same	Both say the same thing.	A Staff Register will be maintained in all work locations to capture worker time of resumption and departure
<b>Institutional Cooperation regarding labour risk management</b>	Lack of synergy between FMOEnv and Ministry of Labour and Employment limits the efficiency and effectiveness of Labour risks on projects	Procedures for managing these Labour management risks and impacts are infused herein	Lack of Unified Standard for the Nigerian Labour legislation.	NASSP-SU programme will adopt improved consultation with both ministries seeking more collaboration throughout the duration of the project.
<b>Standard and Resources for OHS management</b>	Inadequate resources, capacity, standardized tools for effective implementation and monitoring of OHS standards	Adequate OHS Procedures are set out according to ESHS	There are no adequate resources, resources and standardized to implement OHS.	The NASSP-SU programme will implement the Provisions of ESS2.
<b>Gender Issues</b>	No provision in Labour Act that prohibits sexual harassment or any other kind of harassment as an employee. However, there is a subsisting National Act addressing sexual harassment.	The procedure forbids sexual harassment of any kind especially once the grievances have been reported	The Labour ACT did not make provisions for Gender issues like sexual harassment, Sexual Exploitation and Abuse (SEA)	Gender-based principles as provided by ESS2 will be implemented in the NASSP-SU programme.

<b>Terms &amp; Conditions of Employment</b>	The country's labour law recognizes that employers must provide the employee with clear agreement terms within the engagement letter termed "Contract Agreement" whether written or verbal within the first 3 months	Provisions of clear information and documentation are provided at the onset of working relationship	Both have documented evidences, but the procedures could differ,	NASSP-SU programme will implement the ESS2 provisions.
<b>Workers' Organization</b>	National legal framework is robust and implemented well in the formal sector, however, casual workers are not given the same benefits (such as compensation for injuries, right to belong to trade unions and bargain collectively, various social security benefit, unequal pay, forced Labour, absence of grievance redress mechanism)	This standard makes provisions for borrowers to promote sound worker-management relationships and enhance the development benefits of a project by treating all workers in the project fairly and providing safe and healthy working conditions.	Both provisions have provided to take care of Workers health and conditions. However, the National legal framework does not have Grievance Redress Mechanism (GRM)	NASSP-SU programme will implement the ESS2 provisions in this regard.

#### 4.5 International Labour Legislation

The project will be guided by the following international regulations

- International Labour Organization (ILO)
- Africa Regional Labour Administration Centre (ARLAC)
- Organization of African Trade Union Unity (OATUU)
- Africa Union, Labour and Social Affairs Commission (AULSAC)
- Organization of Trade Union of West Africa
- Pan African Employers Association
- Pan African Productivity Association (PAPA)
- International Social Security Association (ISSA)

Their mandate as relevant to the NASSP-SU includes:

- Development and promotion of productive employment policies and programs.
- Stimulation and enhancement of National Productivity Consciousness, rewards for excellence and promotion of national competitiveness.

- Skills Development, upgrading, certification, placement in various areas of national needs.
- Provision of Social Security Coverage, Welfare and Employee's Compensation to the nation's workforce.
- Provision of Labour Protection Services, supervision, enforcement, Education
- Promotion of Social Justice, Ratification, Implementation and Review of National Labour Laws and Policies.
- International Labour Diplomacy.
- Occupational Safety and Health.

## **Section Five: Roles and Responsibilities for Managing the LMP**

### **5.0 Introduction**

NASSP-SU at the federal level shall be responsible for the Implementation of this LMP prepared for the intervention activities under the program. This includes occupational safety, health and welfare of workers, and ensure contractor compliance.

### **5.1 Federal Level Support**

This shall consist of a three-level implementation structure at the federal level. NASSP-SU shall be chaired by the Minister of State, Federal Ministry of Finance, Budget and National Planning (FMFBNP). This office will provide the policy guidelines for the programme.

NASSCO/NCTO will coordinate and develop strategies required for managing the prevalent risk in the NASSP-SU programme. NASSCO/NCTO will be staffed with personnel to carry out the function of technical assistance, procurement, financial management, communications, monitoring and evaluation, social and environmental aspects including gender. They will be required to deploy technical skills, knowledge, expertise and allocate the financial resources needed to achieve the set target.

They will ensure that risks are identified, evaluated and managed by ensuring that proffered mitigations measures are suitable and adequate to reduce the identified risk levels in the programme.

### **5.2 Specific Responsibilities of the LMP are outlined below:**

#### **5.3 Responsibilities of the Safeguard Specialist**

The Safeguard Specialist shall be under the direct supervision of National Coordinator, with the following duties.

- 1) Organize local-level capacity building and interaction programs on environmental screening and environmental awareness as well as organize national level consultations with major stakeholders.
- 2) Prepare national guidelines, tools and notes for use in the program based on relevant environmental, labour policies, acts and regulations/ directives of the Government of Nigeria and relevant safeguard policies of World Bank.

- 3) Coordinate and guide consultant engaged to carry out verification of deliverables with ESS2 requirements.
- 4) Assess the adequacy of implementation of safeguards mitigation measures and the capacity of the institutions and agencies responsible for environmental safeguards issues, as they relate to the programme. Provide technical and problem-solving support and selective training to individuals and stakeholders responsible for implementation of safeguard processes and mitigation measures.
- 5) Evaluate environmental and social risks associated with program activities.
- 6) Coordinate all E&S risks both at the Federal and State level in coordination with the E&S staff at the State Operation Coordinating Unit/State Cash Transfer Unit.
- 7) Produce monthly, quarterly and annual reports in a manner understood by nontechnical people for effective dissemination purpose.
- 8) Develop in liaison with NASSCO/NCTO MIS Specialist an information management system/database on safeguard aspects, including a system to track the project's relevant documents and records.
- 9) Facilitate the implementation of the project's Grievances Redress Mechanism (GRM) by monitoring the status of grievances, facilitating their resolution, maintaining documentation, and reporting the progress through monitoring reports.
- 10) Prepare and submit timely and regular progress reports indicating full compliance with this LMP and other safeguards requirements under the program.
- 11) Develop a system for continuous stakeholders' consultation with consideration for women and others vulnerable in decision regarding programme activities.

## **Section Six: Policies and Procedures for Labour Impact Management**

### **6.0 Introduction**

Employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment. The following measures shall be followed by programme management to ensure fair treatment of all employees:

- Recruitment procedures will be transparent, public and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability or gender.
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract.
- All workers shall be required to submit two letters of recommendations, at least one from previous employers
- Employees shall be informed at least one month before project closure or termination of contract appointment. In the case of disciplinary action, the provisions of the Staff Regulations and conditions of service shall apply.
- In addition to written communication, an oral explanation of conditions and terms of employment shall be provided to workers.

### **6.1 Child Labour and Minimum Age of Employment**

Although age for employment in Nigeria differs, the project will only engage person at minimum age of sixteen (16) and this will be enforced at recruitment. Consultants will be required to verify the identify and age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or medical or school record.

#### **6.1.1 Forced Labour**

The Project shall not allow any form of forced labour, and every effort must be made to ensure that all workers work without any form of restrictions on their movement. NASSCO/NCTO/SOCU/SCTU shall not limit workers' ability to use the toilet, eat, perform religious prayers and take breaks during work periods.

### **6.2 Terms and Conditions of Employment**

Terms and conditions of direct workers are determined by their individual contracts, public service rules (for government staff) and the provisions of the staff regulations and conditions of service.

#### **6.2.1 Non-discrimination and Equal Opportunity**

In Nigeria, common grounds of discrimination in the workplace include gender (against women), disability, health status (against carriers of HIV/AIDS), physical appearance and organizational affiliation including tribes, states of origin, religion etc. Therefore, NASSCO/NCTO shall monitor discriminatory practices not only in hiring procedures but throughout all stages of employment.

### **6.2.2 Worker Privacy**

NASSCO/NCTO shall comply with international standards aimed at safeguarding workers' right to privacy. Any personal information that the NASSCO/NCTO gathers about its workers shall be used for the intended purposes which the worker must be aware of. Personal information about a worker must be collected directly from the worker unless he/she consents, in writing, to the third-party release of personal information. Where workers are being monitored, including the use of CCTV cameras, NASSCO/NCTO/SOCU/SCTU shall ensure that such practices do not violate workers' right to privacy. Hence, regardless of how NASSCO/NCTO decides to monitor its workers, its monitoring practices must be reasonable, proportional and justifiable to the project needs served.

#### **(i) Staff Insurance and Other Matters**

All NASSCO/NCTO/SOCU/SCTU staff are encouraged to take pension, Group Personnel Life and Accident Insurance Scheme. NASSCO/NCTO/SOCU/SCTU may facilitate these schemes for the benefit of staff on a voluntary, equitable and contributory basis. There shall not be any financial obligation on NASSCO/NCTO/SOCU/SCTU. Payment for Insurance therefore is not an eligible expenditure under the IDA. Therefore, Government Contribution can be used for health and Group Insurance for NASSCO/NCTO/SOCU/SCTU staff, but this is subject to the approval of Supervisory ministry/Agency/Body.

#### **(ii) Annual Leave**

It is the responsibility of the Administrative Officer of the NASSCO/NCTO/SOCU/SCTU to compile an annual leave roaster in collaboration with the Heads of Departments and the approval of the National/Project Coordinator at the beginning of the year. An annual leave can be taken in two instalments. Any leave not taken within the calendar year shall be deemed forfeited unless there is express approval of the National/Project Coordinator.

#### **(iii) Casual Leave**

A maximum of seven days' casual leave may be granted to staff based on the recommendation of the HOD or NC/NPC. Staff can only enjoy casual leave after exhausting his/her annual leave for the year. Casual leave more than seven days shall be monetized and deducted from the staff's benefits.

#### **(iv) Sick Leave**

A sick leave on full pay may be granted by the NASSCO/NCTO subject to a maximum of three months on the production of a medical certificate signed by a government Medical Officer or medical practitioner approved by government. NASSCO/NCTO may extend the sick leave for additional period of three months. Thereafter, if the employee is still unfit to resumed duty such employee may be invalidated.

#### **(v) Maternity Leave**

All female staff who are pregnant or those who have adopted an infant through legal means with proper documentations shall be entitled to 16 weeks maternity leave with full pay. The annual leave for that year shall be regarded as part of the maternity leave.

#### **(vi) Public Holidays**

There shall be public holiday for all staff as approved by the Government and this shall be properly communicated by the administrative Officer.

## **Section Seven: Grievance Redress Mechanism (GRM) for Workers**

### **7.0 Introduction**

**Is this GRM different from the Project GRM discussed in chapter 6 page 48? Who is this for? Normally the LMP has the workers GRM where most of the responsibility is generally that of the Contractor.**

Workers must have the right to submit grievances regarding workplace concerns without the threat of adverse employment action or prejudice. Complaints may range from dissatisfaction with work hours and rest periods to claims of coercion, intimidation or abuse. To facilitate the expression of these complaints.

- NASSCO/NCTO/SOCU/SCTU /contractor/consultant must work with the workers or their representatives to establish and maintain an effective grievance mechanism through which workers can lodge complaints.
- Worker's grievance and complaints boxes must be put in place at vantage places where workers can log their complaints anonymously.
- The contractors must inform all workers about the grievance mechanisms put in place. The grievance mechanism should serve three key functions.
  - o It should serve as a focal point of communication across the organization where workers can report and receive advice on grievances, from which concerns and grievances are channeled to management.
  - o The mechanism should be mandated to identify remedies to be implemented through internal procedures in the form of corrective action, mediation, settlement, or dispute resolution.
  - o The mechanism should have the capacity to direct complainants or hand over cases to appropriate external mechanisms, including state-based mechanisms, such as courts.
- The internal grievance redress mechanism should not in any way prejudice the complainant's ability to seek recourse through external mechanisms.
- Any worker filing a grievance must receive notice of the contractor/employer's finding regarding his or her complaint and whether corrective action will be taken.

### **7.1 Purposes of GRM**

- The purposes of a well-established and well-functioning GRM are to.
- Ensure that grievances, complaints and concerns are addressed and resolved in a fair, transparent and easily accessible manner to achieve the goals of restoring positive relationships with project workers (Direct and contracted workers)/
- Be responsive to the needs of project workers and to address and resolve their grievances.
- Serve as a conduit for soliciting inquiries, inviting suggestions, and increasing project workers' participation.
- Collect information that can be used to improve operational performance.
- Promote transparency and accountability.
- Deter fraud and corruption and mitigate project risks.
- Facilitate timely feedback from project workers about NASSP-SU to support the

project's commitment to continuous improvement.

## 7.2 Process Steps

**Step 1: Publicizing Grievance Redress Mechanism Manual:** GRM manual should be publicized and make sure the availability of manual to all program workers.

**Step 2: Receiving and Keeping Track of the Grievances:** Once programme workers are aware of the mechanism and use it to address grievances, there is need of processing the grievances. The Processing activities includes: (1) collecting grievances; (2) recording grievances as they come in; 3) registering them in a central place; and 4) tracking them throughout the processing cycle to reflect their status and importance.

**Step 3: Reviewing and Investigating Grievances:** All grievances will need to undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances.

**Step 4: Developing Resolution Options and Preparing a Response:** Once the grievance is well understood, resolution options can be developed taking into consideration program workers preferences program policy, experience, current issues, and potential outcomes.

**Step 5: Monitoring, Reporting and Evaluating a Grievance Mechanism:** Monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism and the efficient use of resources, and for determining broad trends and recurring problems so they can be resolved proactively before they become points of contention. Monitoring and reporting also create a base level of information that can be used to report back to NASSP-SU Management.

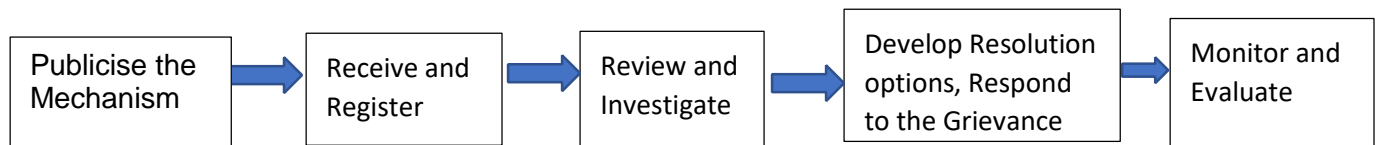


Figure 1: Complaints Registration Process in NASSP-SU programs

## 7.3 Importance of the GRM

This Grievance Redress Mechanism (GRM) section introduces this program to the overall GRM of NASSP programme. To ensure transparency and accountability in the programme, a grievance redress mechanism (GRM) to address program/ workers-related grievances will be established by the NASSCO/NCTO. The GRM will help NASSP-SU in the following manner:

- Provides a forum for resolving grievances and disputes at the lowest level.
- Resolves disputes relatively quickly before they escalate to an unmanageable level.
- Helps win the trust and confidence of project workers (direct and contracted workers), in the program and creates a harmonious workplace.
- Helps avoid program delays and cost increases and improves quality of work.

## **7.4 Grievance Handling Procedure in NASSP-SU Project**

The received grievances will be registered into standard database, analysed and categorized by the ESM specialist for NASSP-SU. Below are the main components of NASSP-SU Grievance Handling Procedure.

### **7.4.1 Grievance Redress Committees (GRCs)**

NASSP-SU will establish Grievance Redress Committees at the subproject level, State level and HQ level to redress the grievances of the Affected Persons (APs)/ Households (HHs) or process stakeholders' comments. The GRCs at different levels do not have any legal mandate or authority but act as a facilitator on a voluntary basis trying to resolve issues between the complainant and the NASSP-SU project. Any member of the subproject GRC elected by the members of GRC at subproject level will be focal point of GRM at subproject level. The subprojects level GRC reports to the SPIU at the state levels. At this level the state SPIU mediates and monitors their activities.

### **7.4.2 Meeting Schedule of GRCs**

Subproject level GRC will meet every 10 days and minutes of the meeting will be taken by any one of the GRC members. At the state level the GRC will meet once in two weeks; while meeting for HQ level GRC will be held once a month but if there are more cases this GRC can meet more than once in month. Minute of this meeting will be prepared by ESM unit which will be circulated to all the GRC members. The progress on Minutes of Meeting will be discussed in next meeting with special emphasis and will be given to pending concerns/ issues.

### **7.4.3 The complaints & grievances would be addressed through the following sequence**

- Complaint resolution will be attempted at sub-Project level GRC who have 10 days to decide on the case
- If Subproject level GRC fails to resolve the grievance, Grievance is forwarded to GRC at SPIU level who has 14 days to decide on the case.
- If the SPIU failed to be resolved at his level, then the Grievance is forwarded to GRC at HQ level. HQ level GRC has 20 days to resolve the grievance
- If the grievance redress system fails to satisfy the APs, they can pursue further by submitting their case to the appropriate court of law.

## **7.5 Communication Strategy**

The GRM procedures to be followed for all the collaborating agencies and Ministries projects will be coordinated by the NASSCO/NCTO and handled by the Grievance Redress Mechanism. A communication campaign will be done by the Communications Unit to ensure that beneficiaries, CDC and communities, staff and other stakeholders know where and how to submit grievances. NASSP-SU related grievances should be received from different channels as directed in NASSP-SU Grievance Redress Manual.

## **7.6 Institutional Arrangements and Capacity building**

### **7.6.1 GRM Institutional Arrangement**

To implement the GRM and functionality of GRC ESM specialist (GRM focal point at NASSCO/NCTO) is responsible to oversee and supervise the grievances reporting and GRM database.

### **7.6.2 GRM Implementation**

The GRM manual shall be used by the NASSCO/NCTO to manage all grievances on the programme at the federal level. To have proper implementation of GRM, first project workers should be aware of the provisions of the manual.

### **7.7 Worker Feedback system**

The worker feedback system will log all grievances, issues and concerns raised by workers during engagement sessions. The system will also record information on measures to address issues, timeframes, personnel responsible and any subsequent feedback that is required.

### **7.8 Accident and Incident Recording Reporting and Investigation System**

The number and type of all accidents and incidents including near misses occurring during the construction phase shall be recorded including the corrective actions required to address them. In addition, the system should identify roles and responsibilities for recording, reporting and investigating incidents and for corrective action planning.

### **7.9 Community Feedback**

#### *Complaints and Grievance System*

Community complaints and concerns will be captured and addressed through the main Grievance Redress Mechanism (refer to Stakeholder Engagement Plan).

#### **7.9.1 Information on Disclosure**

This LMP will be reviewed periodically. It is one of the foundational documentations required during the planning stage. The LMP, which shall be in English, will be made accessible for the public at the following locations:

- Federal Ministry of Humanitarian Affairs, Disaster Management, and Social Development.
- Federal Ministry of Finance, Budget and National Planning.
- NASSCO/NCTO offices.
- Federal Ministry of Industry, Trade and Investment
- Federal Ministry of Environment

For other Federal Ministries, Departments and Agencies in Nigeria, electronic copies of the LMP will be placed on the website of the Bank and at each of the implementing agencies. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from concerned persons will include press releases and announcements in the media, notifications of the disclosed materials to local, regional and national NGOs, relevant professional bodies as well as other interested parties.

This document can also be made available to the workers of all the concerned government Ministries and Agencies through the following media: website, e-mail, handbooks and during in-house trainings.

### **7.10 Timetable for Disclosure**

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP, LMP will be implemented within the following timeframe:

- Placement of the LMP in public domain – Dates to be confirmed by the NASSCO/NCTO and the above Implementing Agencies.
- 21-day disclosure period – Dates to be confirmed by the NASSCO/NCTO and the above Implementing Agencies.
- Following the approval of the LMP document for disclosure, then the abridged document is published in three (3) widely read Newspapers; radio jingles/announcements are carried out, jingles on radios at prime time, for at least twice a week.
- Federal Ministry of Environment published document on its website.
- The World Bank also publishes the LMP document on its external website.

## **Section Eight: Management of Consultants**

### **8.1 Introduction**

Selection of consultant shall be made according to the World Bank procurement procedures and occupational health and safety as provided in the World Bank Standard Procurement Documents and Nigerian laws. In addition, proper training and orientation shall be given by the NASSCO/NCTO and the Environmental and Social safeguards specialists on different stages of awarding contracts and implementation, to ensure full understanding and compliance.

### **8.2 Verification, Monitoring Mechanism and Reporting**

In realization of the project objectives for the Result Framework, several layers of monitoring systems will be instituted as part of Labour Management Plan.

### **8.3 Human Resources Employee Database**

There shall be a database of all workers employed under the NASSP-SU Project. The database will record information on the personal details of employees (such as home address, next of kin/emergency contact), their job description, role and responsibilities, training records and training needs, etc.

### **8.4 Contractor Database**

There shall be comprehensive database of all primary and secondary contractors for NASSP-SU the Project. The database will record a summary of their scope of work, business origins, and a brief profile about history of compliance to environmental and social standards.

### **8.5 Supply Chain Database**

This will contain information of the key suppliers which will be used to monitor the primary supply chain and record results of risk assessments for incidents of child and / or forced labour and significant environmental safety issues.

## **Sample Code of Conduct**

The main aim of the Code of Conduct is to prevent and/or mitigate the social risks within the context of rehabilitation and expansion of schools. The Codes of Conduct are to be adopted by project workers. This code of conduct covers Occupational Safety and Environmental Compliance, Gender Based Violence and Violence against Children.

### **KEY DEFINITIONS**

The following definitions apply:

#### **Gender Based Violence (GBV)**

This is defined as any conduct, comment, gesture, or contact perpetrated by an individual (the perpetrator) on the work site or in its surroundings, or in any place that results in, or is likely to result in, physical, sexual, or psychological harm or suffering to another individual (the survivor) without his/her consent, including threats of such acts, coercion, or arbitrary deprivations of liberty.

#### **Violence Against Children (VAC)**

This may be defined as physical, sexual or psychological harm of minor children (i.e. under the age of 18), including using for profit, labour, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any mediums.

#### **Child Labour**

This involves employment of underage. Any person under the age of 18 should not be employed in the project sites.

#### **Child Protection (CP)**

An activity or initiative designed to protect children from any form of harm, particularly arising from VAC, and child labour.

#### **Child**

The word is used interchangeably with the term 'minor' and, in accordance with the United Nations Glossary on Sexual Exploitation and Abuse, refers to a person under the age of 18.

#### **Grooming**

This is defined as behaviours that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child and then seek to sexualise that relationship (for instance by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

#### **Online Grooming**

This is the act of sending an electronic message with indecent content to a recipient who the sender believes to be a minor, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

#### **Survivor/Survivors**

This is defined as the person(s) adversely affected by GBV, VAC, and child labour. Women, men and children can be survivors of GBV, VAC, and child labour.

### **Perpetrator**

This is defined as the person(s) who commit(s) or threaten(s) to commit an act or acts of GBV, VAC, and child labour.

### **Consent**

This word is defined as the informed choice underlying an individual's free and voluntary intention, acceptance, or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. Any use of a threat to withhold a benefit, or of a promise to provide a benefit, or actual provision of that benefit (monetary and non-monetary), aimed at obtaining an individual's agreement to do something, constitutes an abuse of power; any agreement obtained in the presence of an abuse of power shall be considered non-consensual. In accordance with the United Nations, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the code of conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defence.

### **Contractor**

This is defined as any firm, company, organisation or other institution that has been awarded a contract to conduct infrastructure development works in the context of the project and has hired managers and/or employees to conduct this work.

### **Manager**

The word is used interchangeably with the term 'supervisor' and is defined as any individual offering labour to the contractor, under a formal employment contract and in exchange for a salary, with responsibility to control or direct the activities of a contractor's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.

### **Employee**

This is defined as any individual offering labour to the contractor on or off the work site, under a formal or informal employment contract or arrangement, typically but not necessarily in exchange for a salary (e.g. including unpaid interns and volunteers), with no responsibility to manage or supervise other employees.

### **Workers Committee**

A team established by the Contractor to address GBV, VAC, child labour and other relevant issues with the workforce.

## **Annex 1.1: Sample Codes of Conduct**

This Section presents three Codes of Conduct (CoC) for use:

1. **Workers' Code of Conduct:** Commits the worker to address GBV and VAC issues.
2. **Manager's Code of Conduct:** Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,
3. **Individual Code of Conduct:** Code of Conduct for each individual working on project funded projects

### **1. Workers Code of Conduct/ Individual**

I, \_\_\_\_\_, acknowledge that preventing any misconduct as stipulated in this code of conduct, including gender-based

violence (GBV), child abuse/exploitation (CAE) are important. Any activity which constitutes acts of gross misconduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit any such misconduct will be pursued as appropriate.

I agree that while working on this project, I will:

1. Consent to security background check.
2. Treat women, children (persons under the age of 18) and persons with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, birth or other status.
3. Not use language or behaviour towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Not participating in sexual activity with children/learners, including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence.
5. Not exchange money, employment, goods, or services for sex, with community members including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
6. Not having sexual interactions with members of the communities surrounding the workplace, worker's camps and fellow workers that are not agreed to with full consent by all parties involved in the sexual act (see definition of consent above). This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex - such sexual activity is considered "non-consensual" within the scope of this Code.
7. Attend trainings related to HIV and AIDS, GBV, CAE, occupational health and any other relevant courses on safety as requested by my employer.
8. Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith.
9. Regarding children (under the age of 18):
  - Not inviting unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
  - Not sleeping close to unsupervised children unless necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
  - Refrain from physical punishment or discipline of children.
  - Refrain from hiring children for domestic or other labour, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

- Comply with all relevant local legislation, including labour laws in relation to child labour.
10. Refrain from any form of theft for assets and facilities including from surrounding communities.
  11. Remain in designated working area during working hours.
  12. Refrain from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours.
  13. Always wear mandatory PPE during work.
  14. Follow prescribed environmental occupation health and safety standards.
  15. Channel grievances through the established grievance redress mechanism.

I understand that the onus is on me to use common sense and avoid actions or behaviours that could be construed as misconduct or breach this code of conduct.

I acknowledge that I have read and understand this Code of Conduct, and the implications have been explained regarding sanctions on-going employment should I not comply.

Signed by: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_

*FOR THE EMPLOYER*

Signed by: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_

**2. Code of Conduct for Managers**

Managers at all levels play an important role in creating and maintaining an environment, which prevents workers' misconduct. They need to support and promote the implementation of the Contractors Codes of Conduct and enforce Workers Codes of Conduct. Workers must adhere to this Code of Conduct. This commits them to develop and support systems which maintain a safe working environment. Worker's responsibilities include but are not limited to:

1. Where possible, ensure employment of local workforces, especially where unskilled labour is required to mitigate social risks.
2. Ensure there is zero tolerance to child labour practices.
3. Promote gender inclusion at all levels.
4. Establish a workers' committee to oversee issues of workers' misconduct including GBV and VAC.
5. Ensure compliance to occupation health and safety requirements for all workers.
6. Ensure that workers dress code is adhered to appropriately.

7. Ensure that access to construction sites is restricted to authorized persons; hoarding is provided and that there is proper signage to construction site(s).
8. Facilitate workers' training and capacity building on social, environmental and health and safety.
9. Ensure that all workers are sensitized on HIV and AIDS issues, provided with condoms and HTC services.
10. Ensure that fundamental workers' rights (e.g. working hours, minimum wages, etc) are protected;
11. Ensure that possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during workings hours should be strictly prohibited.
12. Ensure compliance to all legal requirements.
13. Supervisors failing to comply with such provision can in turn be subject to disciplinary measures including termination of employment; and
14. Ultimately, failure to effectively respond to some provisions of the code of conduct may provide grounds for legal actions by authorities.
15. Ensure that every employee under his/her supervision has been oriented on the Code of Conduct and has signed.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to comply to all rules of this code of conduct. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Signed by: \_\_\_\_\_  
 Signature: \_\_\_\_\_

\_\_\_\_\_ Date: \_\_\_\_\_  
 \_\_\_\_\_

**FOR THE EMPLOYER**

Signed by: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_

Contractors are obliged to create and maintain an environment which prevents social risks. They have the responsibility to communicate clearly to all those engaged on the project the behaviours which guard against any form of abuse and exploitation. To prevent social risks, the following core principles and minimum standards of behaviour will apply to all employees without exception:

1. GBV or VAC constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment and/or contract. All forms of social risks including grooming are unacceptable be it on the work site, the work site

surroundings, or at worker's camps of those who commit GBV or VAC will be pursued.

2. Treat women, children (persons under the age of 18) and people with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic, cultural beliefs/practices, or other status.
3. Do not use language or behaviour towards men, women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Sexual activity with children/learners under 18 (including through digital media) is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defence.
5. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.
6. Sexual interactions between contractor's employees and communities surrounding the workplace that are not agreed to with full consent by all parties involved in the sexual act are prohibited (see definition of consent above). This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex.
7. Where an employee develops concerns or suspicions regarding acts of GBV or VAC by a fellow worker, whether in the same contracting firm or not, he or she must report such concerns in accordance with established Grievance Redress Mechanism (GRM) that protects the identities of victims and whistle-blowers.
8. All contractors are required to attend an induction prior to commencing work on site to ensure they are familiar with the social risks and Codes of Conduct.
9. All employees must attend a mandatory training once a month for the duration of the contract starting from the first induction prior to commencement of work to reinforce the understanding of the institutional social risks and Code of Conduct.
10. The Contractor shall ensure provision of financial resources and support compliance to occupation health and safety requirements for all workers.
11. The Contractor shall ensure that workers dress appropriately i.e. dress in a way that:
  - It is unlikely to be viewed as offensive, revealing, or sexually provocative.
  - Does not distract, cause embarrassment or give rise to misunderstanding
  - Is absent of any political or otherwise contentious slogans
  - It is not considered to be discriminatory and is culturally sensitive
12. The Company shall ensure provision of financial resources and trainings to prevent spread of HIV and AIDS.
13. The company shall comply with all the applicable international and national legislation including giving terminal benefits to workers who have served for at least three months.
14. All contractors must ensure that their employees sign an individual Code of Conduct confirming their agreement to support prevention of social risks activities.

15. The contractor should ensure equitable access to limited natural resources (e.g. water points) to avoid conflicts with local communities
16. Where possible, the contractor should ensure employment of local workforces, especially where unskilled labour is required to mitigate social risks

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in termination of the contract.

*FOR PROJECT WORKER*

Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## Annex 1.2: Sample Occupational Health and Safety Training Plan

S/No	Training Title	Frequency	Responsibility
1	Infectious Prevention and Control	Bi-annually	IPC Specialist
2.	Sensitization on Occupational Health and Safety	Bi-annually	HSE Expert
3.	First Aid Administration	Annually	Certified First Aid Care Giver
4.	Fire Safety	Annually	Fire Safety Officer
5.	Work Ethics and Interpersonal Skills	Annually	Human Resource Specialist

## Annex 2: Generic E-Waste Management Plan for NASSP-SU

### Standard Operating Procedure (SOP) E-waste management system for NASSP-SU

#### 1. Method of Disposal of E-Waste

Before designing this E-Waste Management System for NASSP, there was no proper method for collection and disposal of e-waste. The e-waste was usually collected and auctioned to dismantler or collection center directly or disposed as solid waste. No record was maintained by the Project of e-waste generated and copies of that record were usually managed as part of equipment inventory for accountability purpose only.

#### 2. E-Waste Management System

Some of the salient features of NASSP-SU e-waste management system are to ensure that the Project:

- reduce environmental impact
- achieve proper and effective disposal of e-waste
- facilitate management of the reusable part of condemned items, through repair, reused to repair the faulty part of new equipment, and/or used for assembly purpose.

### **3. Procedure for E-waste Management**

#### **The Project will:**

- a) Maintain annual data of e-waste generated from all the Units and Offices of the Project
- b) Collect data of collected e-waste in the form for maintaining record of e-waste
- c) The recycler to determine and ensure reusable parts shall be taken out and shall be reused.
- d) Ensure that e-waste so generated shall be channeled to collection center designated by NESREA or dealer of authorized producer or dismantler or recycler or through the designated take back service provider of the producer to authorized dismantler or recycler as stipulated by the amended National *Environmental (Electrical and Electronic sector) regulations 2022*. Detailed information is provided in section 4.

### **4. Lists of Forms for Maintaining Records of E-Waste**

Below is the list of forms designed for the collection of all the relevant details with regards to e-waste items generated by each section /department / unit or office. There are three forms in all:

- Form for maintaining records of E-Waste (FMREW)
- Format for maintaining the Record of E-Waste Generated
- Format for Filing Annual Return on E-Waste Generated

#### **FORM FOR MAINTAINING RECORDS OF E-WASTE (FMREW)**

**FORM ONE: E-WASTE INVENTORY TEMPLATE**

S/N	Description of E-Waste (Types)	Quantity (Number of Units)	E-Waste Status		Brand Manufacturer/ Country	Product Model & Serial Number	Date of Manufacture	Year of purchase	Date of Deployment/ Installation	Number of active years in service	Hazardous material content (Lead, Mercury, Cadmium) NB: Indicate	Data Security & sanitization status		Recycling	Landfill
			Working	Not Working								Wiped	Not wiped		

**Format for maintaining the Record of E-Waste Generated**

**From 2: Generated Quantities of E-Waste Per Year**

S/N	Description	Quantity	
1.	Name & Address: Producer or Manufacturer or Refurbisher or Dismantler or Recyclers Or Bulk Consumer		
2.	Date of Issue of Extended Producer Responsibility Authorization		
3.	Validity of Extended Producer Responsibility Authorization		
4.	Type and Quantity of e-waste handled or generated	Category	Quantity
		Item Description	
5.	Type and Quantity of e-waste Stored	Category	Quantity
		Item Description	

6.	Type and Quantity of e-waste sent to collection center authorized by producer/ dismantler/ recycler/ refurbisher/ or authorized dismantler/recycler/ or refurbisher	Category	Quantity
		Item Description	
7.	Types and Quantity of e-waste transported Name and address and contact details of the destination	Category	Quantity
		Item Description	
8.	Types and Quantity of e-waste refurbished* Name, address and contact details of the destination of refurbished materials	Category	Quantity
		Item Description	
9.	Types & Quantity of e-waste dismantled	Category	Quantity
		Item Description	
	Name, address and contact details of the destination		

### Format for Filing Annual Return on E-Waste Generated

#### Form 3: Quantity of E-Waste and Numbers

S/N	Description	Type	Quantity	No.
1.	Name and address of the producer or manufacturer or refurbisher or dismantler or recycler			
2.	Name of authorized person and address			
3.	Total quantity of e-waste collected or channeled to recyclers or dismantlers for processing during the year for each category of electrical and electronic equipment			
	Details of the above	Type	Quantity	No.
3 (A)	Quantity of e-waste			
3 (B)	REFURBISHERS: Quantity of e-waste:			
3 (C)	DISMANTLERS:			
	i. Quantity of e-waste processed			
	ii. Details of materials or components recovered and sold			
	iii. Quantity of e-waste sent recycler			
	iv. Residual quantity of e-waste sent for maintenance, storage, and disposal facility			
3 (D)	RECYCLERS:			
	i. Quantity of e-waste processed			
	ii. Details of materials or components recovered and sold			
	iii. Details of residue of e-waste sent for maintenance, storage, and disposal facility			
4	Name and full address of the destination with respect to 3 (A) – 3 (D) above			

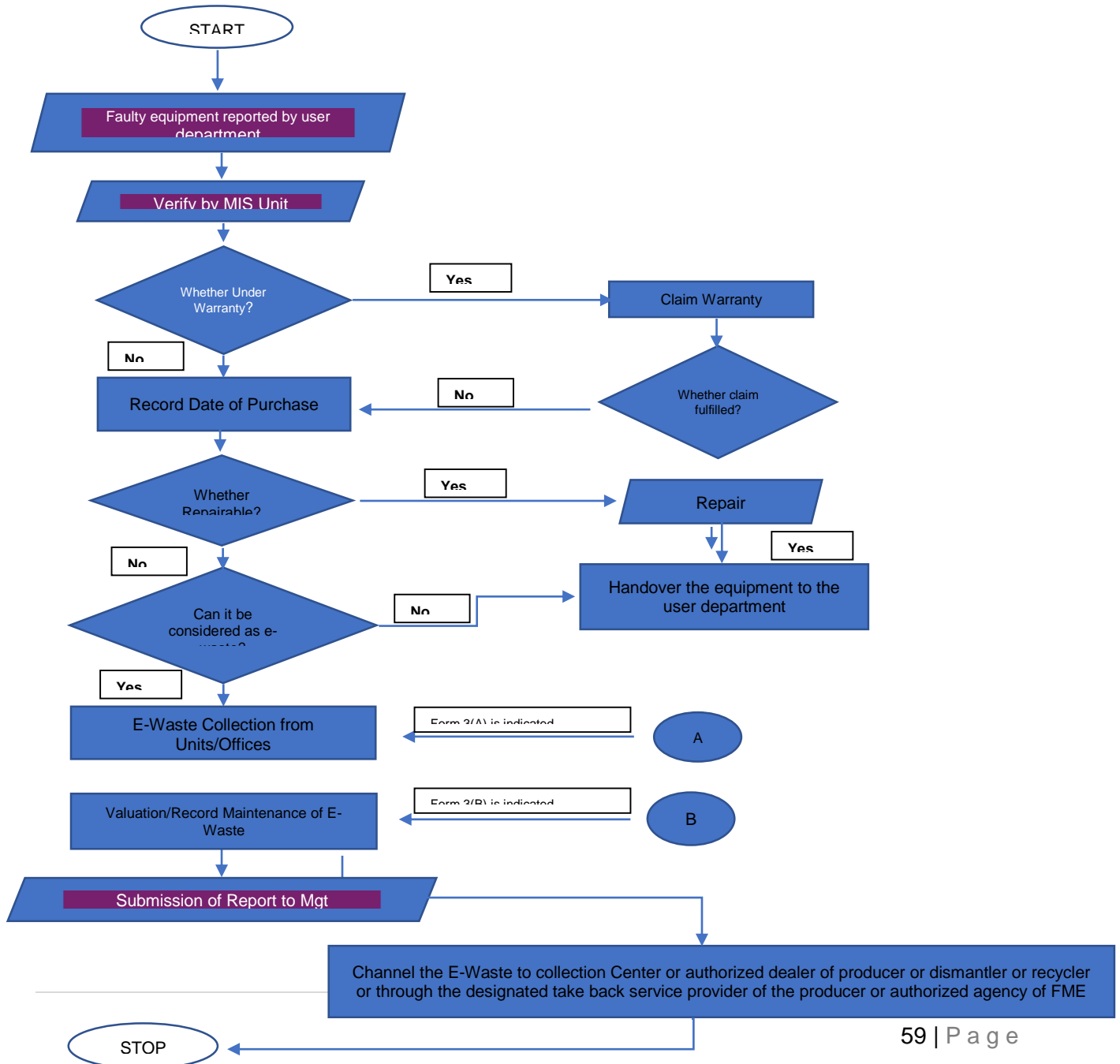
5	Type and quantity of materials segregated or recovered from e-waste as applicable to 3 (A) – 3 (D) above	Type	Quantity
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Enclosed the list of recyclers to whom e-waste has been sent for recycling

Place: \_\_\_\_\_

### Process Flow Chart for Managing E-waste

The process of e-waste management system is designed based on the process flow as illustrated in the following flow chart.



*Figure 1: Process Flow Chart for Managing E-waste*

### **Step-by-Step Guide**

The steps given below are to be followed for managing the e-Wastes by all the stakeholders in the Project.

- After an electronic item is an e-waste, the department/ Unit concerned shall make the entries of the details of the item in the e-waste disposal form.
- The e-waste disposal form will then be submitted to the Admin Department by 30th day of December.
- The Admin Department of the SPIU/ NASSCO/NCTO shall verify the e-waste details mentioned in the e-waste disposal form and prepare a memo for disposal decision by management.
- After verification, the item shall be written off from asset register of the concerned department/unit or office.
- All such condemned electronic items are then collected at the central store along with report submitted in Form for Maintaining Record of E-Waste from concerned department/unit or office.
- The valuation and record of all the e-waste so collected shall be maintained in an e-waste disposal form.
- The report of the e-waste generated shall be submitted to the admin department before the 30th day of June.
- The e-waste so generated shall be now channeled to collection center or dealer of authorized producer or dismantler or recycler or through the designated take back service provider of the producer to authorized dismantler or recycler or the disposal agency of the FME.

### **Annex 3: Guidance for NASSP-SU Implementing Agencies to Plan and Respond to Pandemic/Epidemics**

This document has been produced to provide guidance to the NASSP- SU Implementing Agencies at the Federal and State levels in relation to potential pandemic/epidemics situation.

### **General hygiene Requirements for Project Staff during Project Implementation**

All project staff should observe the following general personal hygiene requirements at work.

- Wash hands or use an alcohol-based sanitizer as soon as they enter office premises. Ensure hands are washed after using the washroom, before eating and regularly throughout the work day, ensuring colleagues follow this advice too.
- Cover their nose and mouth with tissue when coughing or sneezing, followed by washing of hands. Alternatively, sneezing or coughing into their bent elbow if no tissue is available. Used tissues should immediately be disposed of in a covered bin, and not left lying around on any public surfaces
- Ensure you to dispose used tissues in covered bins in office and business premises

- Ensure that the working environment/premises are cleaned and disinfected daily, especially frequently touched surfaces like tables, door handles, countertops, computers, light and air conditioner switches which should be cleaned frequently during the day
- Keep all offices well ventilated, opening windows regularly to enable fresh air

## RECOMMENDATIONS

Recommend steps to sensitize all staff on how to prepare e-waste for transportation and disposal:

- 1. Sort and Separate:** Group similar types of e-waste together (e.g., computers, monitors, cables).
- 2. Remove Personal Information:** Delete or remove personal data from hard drives, phones, and other devices before packing.
- 3. Prepare the Container:** Use a sturdy cardboard box or plastic bin, ensuring it can handle the weight.
- 4. Secure the Bottom:** Tape the bottom of the box with strong tape to prevent it from falling apart.
- 5. Pack Securely:** Use packing materials like bubble wrap or shredded paper to cushion the electronics and prevent them from shifting.
- 6. Layering:** If using a cardboard box, consider placing cardboard inserts between layers of electronics for added protection.
- 7. Avoid Overpacking:** Don't overfill the box, leaving 4-6 inches of space at the top to prevent bulging.
- 8. Mark Clearly:** Clearly label the box with "E-Waste," "Up," and any necessary warnings like "Fragile".
- 9. Consider Weight:** For heavy items like servers or monitors, consider using a pallet and securing them with plastic wrap and corner protectors.
- 10. Separate Cords and Plugs:** Keep power cords and other relevant plugs with the corresponding devices, labeling them clearly if needed.
- 11. Remove Removable Parts:** Remove detachable components like USB drives to minimize the risk of damage or loss during transit.

The Federal Ministry of Health or the Nigeria Centre for Disease Control provides information and guidelines related to pandemics/epidemics. The following contacts could be contacted for the latest information and advice on emerging and current risks:

NCDC Toll-Free Number: 0800 9700 0010

SMS: 0809 955 5577

WhatsApp: 0708 711 0839

## Annex 4: Environmental and Social Management Plan - Terms of Reference

### Introduction

The World Bank is supporting the Federal Government of Nigeria to implement the National Social Safety Nets Project (NASSP) to help reduce extreme poverty. The NASSP-SU is a follow-on intervention that seeks to strengthen national capacity in shock responsive social protection. The overall goal of the NASSP-SU is to expand coverage of shock responsive safety net support among the poor and vulnerable and strengthen the national safety net delivery system.

The overall development objective of the NASSP-SU is to “Expand coverage of shock responsive safety net support among the poor and vulnerable and strengthen the national safety net delivery system.” The programme focus will be to support the government’s effort to curb the impact of various shocks, including high inflation and the impact of any pandemic on the lives and livelihoods of vulnerable Nigerian households. The project is designed to:

- deliver short-term cash transfer support for six (6) months for newly targeted urban and rural vulnerable households and extend support duration for existing NASSP, and beneficiaries.

- finance the development and strengthening of the National Social Safety Net delivery system and institutional support.
- use the current NASSP delivery mechanism and institutional structure for the NASSP-SU.

The project has three components: Component 1 provides shock responsive time-limited cash transfers to households identified through the NSR in rural areas and the expanded RRR platform in urban areas. Component 2 extends the regular cash transfers and relevant productive inclusion support services to the poor and vulnerable households currently supported by the NASSP. Component 3 supports the expansion of the RRR platform in more areas and broadly improves the social assistance delivery system. Component 3 also provides support to program management.

The project has coverage across the whole country, involving the 36 States of the federation and the Federal Capital Territory. Further information on the NASSP intervention could be accessed from the NASSP website: <http://www.nassp.gov.ng>

**A. Rational for the ESMP:** The ESMP is developed to address impacts and risks that may arise during implementation of the NASSP Scale Up. The ESMP aims to examine the potential environmental and social risks associated with the activities financed under the project and sets out mitigation, monitoring and institutional measures to be taken during project implementation to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels through the preparation of site-specific plans in accordance with the Environmental and Social Framework (ESF).

**B. Objective of the Assignment:** The ESMP is developed to manage the potential environmental and social risks associated with the activities under the Project. This ESMP follows the World Bank Environmental and Social Framework (ESF) mandates defined in the three documents previously issues: Environmental and Social Review Summary (ESRS), Environmental and Social Commitment Plan (ESCP), and the Stakeholder Engagement Plan (SEP).

### **C. Scope of Work**

The Consultant is required to prepare ESMP highlighting a set of mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate or reduce adverse environmental and social impacts to acceptable levels. The plan will also include the actions needed to implement these measures. To prepare a management plan, the Consultant will identify (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements.

An ESMP should include the following components:

- **Description of Adverse Effects:** The anticipated environmental and social effects are identified and summarized.
- **Description of Mitigation Measures:** Each measure is described with reference to the effect(s) it is intended to deal with. As needed, detailed plans, designs, equipment descriptions, and operating procedures are described. Measures to enhance positive impacts should also be proposed.

- **Description of Monitoring Program:** Monitoring provides information on the occurrence of environmental effects. It helps identify how well mitigation measures are working, and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where and how often. It should also indicate at what level of effect there will be a need for further mitigation.
- **Institutional Arrangement:** The people, groups, or organizations that carry out the mitigation and monitoring activities are defined, as well as to whom they report and are responsible. There may be a need to train people to carry out these responsibilities, and to provide them with equipment and supplies. Reporting procedure including grievance redress mechanism should also be proposed.
- **Implementation Schedule:** The timing, frequency and duration of mitigation measures and monitoring are specified in an implementation schedule and linked to the overall subproject schedule.
- **Cost estimates and sources of funds:** These are specified for the initial subproject investment and for the mitigation and monitoring activities as a subproject is implemented. Funds to implement the ESMP may come from the subproject grant, from the community, or both. Government agencies and NGOs may be able to assist with monitoring.

Please note that the methods for monitoring the implementation of mitigation measures or environmental effects should be as simple as possible. Further guidance on preparation of ESMP can also be provided, if required. The ESMP will be required to be reviewed and cleared by the World Bank.

#### **D. Deliverables and Proposed/Indicative Structure of ESMP Report**

The proposed structure of the ESMP report is as follows:

- **Executive Summary:** This should provide a general summary of the ESMP contents and key findings, in a vocabulary that is easily understood by the public. It should be clear, concise, ranging from 3 to 5 pages.
- **Introduction:** An introduction describing the ESMP purpose, objectives, principles and methodology. This section should introduce the project proponents, the study team, and provide other relevant information. The layout of ESMP should also be described to facilitate its use.
- **Sub-Project Description:** A description of the subproject which will include background, purpose and different components. Also indicate any subproject specific resource requirements such as material, manpower, equipment, etc.
- **Policy, Legal and Institutional Framework**
- **Socio-Economic Profile of the Project Area:** This section describes socio-economic profile of the project area. It will cover population, socio-economic dynamics, poverty levels, etc.
- **Stakeholder consultation and Information Disclosure:** This section will describe the objective, process, and outcome of the stakeholder consultations carried out during the ESMP preparation. This section should also list arrangements for disclosing subprojects information.
- **Environmental and social risk mitigation measures:** This section will identify social risk with cost effective and feasible measures to reduce adverse environmental impact to

acceptable level. It will describe with technical details mitigation measures and the methodology for social impacts.

- Environmental and Social Management and Monitoring Plan: This section will provide specific description and technical details of monitoring measures. The monitoring and reporting procedures will ensure early detection of conditions that necessitate mitigation measures and furnish information on the progress and results of mitigation.
- Institutional Arrangement: Detailed description of institutional arrangements, roles and responsibilities and reporting procedures should be presented. This section should also propose capacity building and training plan for implementing agencies responsible for this project.
- Grievance Redress Mechanism including SEASH GRM
- ESMP Implementation Budget: An ESMP implementation budget estimates are provided here. The budget will include funds for institutions development activities, training programs for implementation teams and local/national institutions, technical assistance to authorities, costs for preparations of EMPs and other safeguard documents; and
- Annexures: Technical annexes to support ESMP implementation.
  - Labour Management Procedures
  - Generic Waste Management Plan
  - SEA/SH Action Plan

**E. Qualifications and Skills Required**

The consultant must have a minimum of 8 years’ experience in environmental and social management with an advanced degree earned in relevant fields including but not limited to environmental sciences, or the social sciences. Training and hands-on experience in the new ESF implementation is required.

Other requirements are:

- Experience with, and a professional/technical background appropriate for understanding both the environmental and social management implications of chemical/reagent /waste disposals, animal and vectors disposals, and infective/toxic materials, including their design, construction, operation and monitoring.
- Experience in practical safeguards, social and environmental management with demonstrated proficiency in the preparation, review, and approval of ESMF/ESIAs/ESMPs to meet World Bank standards
- Excellent analytical, communication, organization and writing skills.
- It is highly desirable that the consultant has proven evidence and experience working with international development institutions like the World Bank, and on other FIs

**F. Duration and Deliverables**

This assignment shall be for a tentative period of four weeks from the date of approval of No-objection from the Bank.

S/No	Report	Timing
1	Draft Report (Electronic copy)	Week 2
2.	Draft Final Report	Week 3
3.	Final Report (5 Hard Copies and electronic copy)	Week 4

## Annex 5: Basic Safeguards and Security Guidelines

CATEGORIES	EXAMPLES	RESOLUTION FLOW	WHO INVESTIGATES & RESOLVES	RESOLUTION PERIOD	REMARKS
<b>CATEGORY 1: WRONGFUL INCLUSION/EXCLUSION</b>					
<b>1.A Targeting – wrongful exclusion</b>	<p>1. “I am poor, but my name was not written down.”</p> <p>2. “Our community was not covered in the exercise.”</p>	<p>Case 1:</p> <p>1. Complaints when received by the LGA GRO are entered into the register.</p> <p>2. The LGA GRO then forwards the complaint to the SOCU GRM.</p> <p>3. The SOCU GRM manager liaises with the head of operation SOCU to investigate the complaint.</p> <p>4. If the complaint cannot be resolved at SOCU level, the SOCU GRM liaises with NASSCO GRM and HNSR/Zonal Targeting officer to investigate the complaint.</p>	<p>NASSCO/SO CU/CBTT</p> <p>SOCU resolves and communicates NASSCO for update in the NSR and record purposes.</p> <p>SOCU resolves and communicates NASSCO for update in the NSR and record purposes.</p>	<p>1 Month to 3 Months</p> <p>1 week to 2 months</p>	<p>Grievance Categories and Management Procedures</p>

3. "I am very poor, but my household is not identified as poor. Why?"
5. Once investigated, if the complaint requires updating the NSR, SOCU and the HNSR/Targeting Officer NASSCO follow processes laid out in SOP for SR update.
6. SOCU GRM manager ensures resolution of the complaint is communicated back to the complainant either directly (e.g. by phone) or through the LGA GRO.
- 1 week to 2 months

Case 2:

1. Complaint of community not covered, when received by the LGA GRO is entered into the register

2. Where the community was left out and CBT is still ongoing the Desk Officer directs the CBT team back to engage the community and LGA GRO logs this as the resolution of the complaint in the Register.

SOCU

resolves and communicates NASSCO for update in the NSR and record purposes.

3. Where the community is already scheduled to be engaged, the Desk officer or LGA GRO provide that feedback to the complainant; LGA GRO logs this as the resolution in the Register.

5. Where CBTT activities have been concluded in that LGA and the community were not engaged, the LGA GRO escalates the grievance to the SOCU GRM Manager.

6. HOP SOCU ensures the community is engaged after following all the processes of engaging a community. SOCU GRM manager logs this as the resolution to the complaint in the Register and sends it to NASSCO GRM for update.

Case 3:

1. LGA GRO logs complaint in Register and sends to the SOCU GRM manager for investigation.

2. The SOCU GRM manager

liaises with the Head of Operation SOCU to investigate the complaint (e.g. check whether HH was on the community list and should have been enumerated).

3. If the HH is found to be on the community list, SOCU instructs LGA Desk officer to send enumerators to the HH to capture their information. SOP for SR update is followed. SOCU GRM logs complaint as resolved in the register.

4. If HH was not found on the community list, SOCU GRM issues a response explaining that they were not on the community list and therefore not chosen as poor by the community. LGA GRO is responsible for ensuring delivery of response to the complainant and marks the complaint as resolved.

**1.B Targeting – wrongful inclusion**

1.” I am not poor, but my name was written down as a poor household.”

Case 1.  
1. Complaint is entered into register.  
2. The LGA GRO then forwards the

SOCU resolves and communicates NASSCO for update in the NSR and

1 MONTH

complaint to the SOCUGRM Manager. record purposes.

3. The SOCUGRM manager liaises with the HOP of SOCUGRM to investigate the complaint by checking the SR for the HH.

4.. If the HH is found in the SR, the HH is removed, and the SOP for SR update is followed. SOCUGRM issues a response

2 MONTHS

2. "This household is not very poor yet; they have been captured as poor." to the HH that they have been removed from the NSR. SOCUGRM updates the SSR and communicates the same to GRM

SOCUGRM resolves and communicates NASSCO for update and record purposes

3." Some members of the community who are well off are identified as poor in our community."

Some manager NASSCO.

6. The GRM Manager NASSCO liaise with the zonal MIS to update the National register.

7. The LGA GRO or the CBTT feeds back the complainant.

Case 2&3

1. Complaint is entered into the register.

2. The LGA GRO then forwards the complaint to the

SOCU GRM manager.

3. The SOCU GRM manager liaises with the HOP of SOCU to investigate the complaint by recapturing the asset of the household.

4. The information on the household asset is sent to NASSCO GRM Manager who liaises with the data analysis who updates and re-runs PMT for the household.

5 If the household falls below the 6<sup>th</sup> decile, he/she would be allowed in the NBR. However, if the household falls above the 6<sup>th</sup> decile, NASSCO manager communicates enrolment Officer in NCTO to delist such household from the NBR.

6. NASSCO GRM manager communicates resolution to SOCU which in turn passes down to LGA GRO or DO to provide feedback to complainant and inform the household for the reason he/she was delisted.

1C. Enumeration	<p>1. "we are five in our household, but the enumerator only enumerated two members of my household leaving out the others."</p> <p>2. "My Household was identified as poor during engagement, but I was not enumerated"</p> <p>3. "Some members of the community who were not identified were enumerated by the enumerator"</p>	<p>1. Complaint is entered into the register.</p> <p>2. The LGA GRO then investigates the issue.</p> <p>3. If the complaint is established as true after investigation, and enumeration is still ongoing, the LGA GRO liaise with the DO who instructs the enumerators to enumerate the HH</p> <p>4. Where enumeration has been completed in the community, the complaint is forwarded to the SOCU GRM Manager.</p> <p>5. Where the issue is verified as true, the SOCU GRM liaises with the HOP to resolve the complaint.</p> <p>6. The SOCU GRM manager informs the GRM Manager NASSCO to update the NSR.</p>	<p>LG GRO, DO, SOCU SOCU resolves and communicates NASSCO for update and record purposes</p>	<p>1 TO 2 MONTHS</p>
<b>1D. Enrollment - wrongful inclusion</b>	<p>1. "Mr. Andrew's HH is not poor, but he is targeted and enrolled into the NCTP".</p> <p>2. "An under aged child was enrolled as the care giver or alternate."</p>	<p>1. Complaint is entered into the register.</p> <p>2. The LG GRO sends the complaint to the SCTU GRM manager.</p> <p>3. The SCTU GRM manager liaises with SCTU Enrollment Officer to resolve. SCTU</p>	<p>SOCU, SCTU, NASSCO, NCTO SOCU resolves and communicates NASSCO for update and record Purposes</p>	<p>21 DAYS TO 1 MONTH</p>

officers may need to work with SOCU Officers to investigate.

4. Any necessary changes to the NSR or NBR are communicated to NASSCO / NCTO according to established procedures.

5. When the complaint is resolved, the SCTU enrolment officer feeds back to the SCTU GRM officer.

6. SCTU GRM officer issues response and they or the LGA GRO delivers a response to the complainant.

**1E. Enrollment – wrongful exclusion**

1.” I was targeted by the CBTT but not enrolled into the NCTP even though I am poor.

2. “I was away/ sick during the enrolment process.”

1. Complaint is entered into the register.

2. The LG GRO sends the complaint to the SCTU GRM manager.

3. The SCTU GRM manager liaises with the SCTU enrolment officer to investigate and resolve.

4. In the case of non-enrollment in NCTP though they were in the NSR, SCTU works with SOCU to check the SR to verify the PMT score of the

SOCU, SCTU, NASSCO, NCTO

SOCU and SCTU resolve and communicate NCTO National Enrolment Officer for update and record purposes

21 DAYS TO 1 MONTH

HH. If HH is above the cut off, the response would be to explain the cut-off point. If the HH is below the 60% cut off, then they would be enrolled in the program.

5. Where the HH was missing during enrollment, SCTU would make plans for returning to enroll that HH.

6. SCTU GRM manager issues this response in the register and they or the LGA GRO deliver the response.

**1F. Co-responsibilities-wrongful exclusion**

“My child is eligible, but my HH is not identified by the team”

1.Complaint is entered into the register/GRM Application.

2. The LG GRO sends a complaint to the SCTU GRM officer.

3. The SCTU GRM officer forwards the complaint to the SCTU co-responsibility officer for investigation.

4.The State Co-Responsibility Officer resolves the issue where he/she can do so.

5. Where he/she is unable to do so, some complaint will be escalated to the National Co-

SCTU Co 21 DAYS  
Responsibility officer investigates, resolves and feedback to the SCTU GRM Manager

responsibility Officer.  
 6. The National Co-Responsibility Officer resolves the issue and sends feedback to the SCTU Co-responsibility officer.  
 7. The SCTU Co-Responsibility officer sends feedback to the SCTU GRM manager.  
 8. The SCTU GRM manager updates the register with the resolution and they or the LGA GRO delivers the feedback to the complainant.

**1G. Co-responsibilities – wrongful inclusion**

“That HH is not eligible for Top Up, but they have been enrolled”

1. Complaint is entered into the register.  
 2. The LG GRO sends the complaint to the SCTU GRM officer.  
 3. The SCTU GRM officer forwards the complaint to the SCTU co-responsibility officer for investigation.  
 4. The State Co-Responsibility Officer resolves the issue where he/she can do so.  
 5. Where he/she is unable to do so, same complaint will be escalated

SCTU Co 21 DAYS  
 Responsibility officer investigates, resolves and feedback to the SCTU GRM Manager

to the National Co-responsibility Officer.

6. The National Co-Responsibility Officer resolves the issue and sends feedback to the SCTU co-responsibilities officer.

7. The SCTU Co-Responsibility officer sends feedback to the SCTU GRM manager.

8. The SCTU GRM manager updates the register with the resolution and they or the LGA GRO deliver the feedback to the complainant and close the complaint.7. The NGRMO updates the dashboard appropriately and feedback outcome to the state GRM who will in turn feedback to the complainant.

**1H.**  
**Livelihood**  
**d –**  
**wrongful**  
**exclusion**

“My HH is due for the Livelihood grant but it was excluded, please help me”

1. Complaint is received and registered.  
2. The LG GRO sends the complaint to the SCTU GRM officer.  
3. The SCTU GRM officer forwards the complaint to the SCTU livelihood officer.

SCTU Livelihood Officer investigates, resolves and feedback to the SCTU GRM officer on the outcome

21 DAYS

4. The SCTU livelihood Officer resolves the issue where able to do so.
5. Where unable to do so, he/she escalates to the National Livelihood Officer who then resolves the issue and sends feedback to the SCTU livelihood Officer.
6. The SCTU livelihood officer sends feedback to the SCTU GRM officer.
7. The SCTU GRM officer updates the register and they or ensure that the complainant receives feedback.

<b>11. Livelihood - wrongful inclusion</b>	“Labake’s HH is included for Livelihood grants and they are not eligible”	<ol style="list-style-type: none"> <li>1. Complaint is received and registered.</li> <li>2. The LG GRO sends the complaint to the SCTU GRM officer.</li> <li>3. The SCTU GRM officer forwards the complaint to the SCTU livelihood officer.</li> <li>4. The SCTU livelihood Officer resolves the issue where able to do so.</li> <li>5. Where unable to do so, he/she escalates to the</li> </ol>	SCTU Livelihood Officer investigates, resolves and feedback to the SCTU GRM officer on the outcome	21 DAYS
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National Livelihood Officer who then resolves the issue and sends feedback to the SCTU livelihood Officer.  
 6. The SCTU livelihood officer sends feedback to the SCTU GRM officer.  
 7. The SCTU GRM officer updates the register and they or the LG GRO delivers the feedback and closes the complaint.

**CATEGORY 2: PAYMENTS AND PAYMENT SERVICE DELIVERY**

**2.A  
 Omission  
 from  
 payment  
 list**

“My name is omitted from the payment list”

1. Complaint is entered into the SCTU payment register. SCTU officer does all investigation, liaising with NCTO as necessary, the provides the feedback to SCTU GRM Manager.

2. LG GRO sent to SCTU GRM Manager. SCTU GRM Manager shares with SCTU Payment Officer to verify with the Payment Schedule. SCTU Payment Officer liaises with SCTU MIS to check status on Enrollment list.

3. SCTU GRM Manager shares with SCTU Payment Officer to verify with the Payment Schedule. SCTU Payment Officer liaises with SCTU MIS to check status on Enrollment list.

4. When confirmed, the Schedule is sent to NCTO National Payment Officer for resolution.

5. The NCTO National Payment

1 WEEK

officer resolves the issue and sends feedback to the SCTU Payment Officer.

6. The SCTU payment officer forwards the findings to the SCTU GRM manager.

7. The SCTU GRM officer updates the register and they or LG GRO delivers the feedback and closes the complaint.

**2.B  
Delay in  
payment**

“Payment Agent did not arrive on time. I was not attended to on time;”  
“For some time now, we have not been told to come out for payment”

1. Complaint is entered into the register.

2. LG GRO sent to SCTU GRM Manager.

3. SCTU GRM Manager shares with SCTU Payment Officer to investigate and resolve. If necessary, SCTU payment officer liaises with NCTO payments team to resolve.

6. The SCTU payment officer feeds back response to the SCTU GRM manager.

7. The SCTU GRM officer updates the register and they or LG GRO delivers the

SCTU payment officer investigates, resolves and feeds back to the SCTU GRM Manager

WITHIN 7  
DAYS

feedback and closes the complaint.

**2.C  
Incorrect  
payment  
amount**

“I was paid N8,000 instead of N10,000” OR “I was paid N12,000 instead of N20,000 by the PSP.”

These complaints must be reported at the pay point during payments. If they are reported *after* payment has concluded the complaint cannot be entertained.

The CTF, LG GRO, PAYMENT OFFICER or any other staff present when this occurs, will resolve this immediately.

**ON THE SPOT Beneficiaries are always sensitized to count their stipend at the PAY POINT to be certain that it is complete before leaving the counter**

1. As soon as the beneficiary raises the alarm of incomplete stipend during payment, a Spot Check is immediately conducted by the Payment officer, the CTF, LG GRO or any other SCTU staff present at the pay point.
2. Program staff checks the payments schedule to verify the amount the person was supposed to receive.
3. Where it is confirmed that indeed the beneficiary was shortchanged by some amount, the Payment agent will be made to complete that amount IMMEDIATELY to the affected beneficiary.

4. Underpayment by the agent will be reported to the relevant PSP as a caution.  
 5. The complaint is logged and resolved immediately in the GRM register for record keeping purposes.

**2.D  
 Mistreatment or  
 extortion  
 by  
 payment  
 agent**

“The Agent did not pay some of the beneficiaries their complete stipend during the just concluded payment cycle (MAY/JUNE 20.)”

“The payment agent is always insulting beneficiaries and speaking rudely to them”

1. Complaint is registered.  
 2. The LG GRO escalates the complaint to the SCTU GRM manager.  
 3. The SCTU GRM Manager and the Payment Officer investigates to verify the authenticity of the complaint.  
 4. After investigation and it is found to be true, the complaint is sent to the National GRMO and the National payment officer who contacts the Payment Service Provider on the action(s) of the Payment agent for disciplinary action to be taken against him or her.  
 5. Where extortion is committed by the payment agent and all investigations have been conducted,

SCTU GRM 7 TO 14  
 Manager, DAYS  
 SCTU  
 Payment  
 Officer, NCTO  
 GRM  
 manager,  
 NCTO  
 payments  
 officer & The  
 NCTO  
 Programme  
 Coordinator

showing that the agent is guilty, the following steps will be taken:

- The PSP concerned will be notified
- The payment agent will be made to PAY BACK IN FULL, all the monies taken from the beneficiaries
- The payment agent will be WITHDRAWN from the NCTP before the next payment cycle so that he does not perpetuate his acts.

6. The response is communicated back to the NCTO GRM manager to be entered into the register. SCTU GRM manager or LG GRO delivers the response and closes the complaint.

<b>2.E</b>	"I am the only one that has not received my Programme ID Card, please help me"	1. Complaint is registered. 2. The LG GRO escalates the complaint to the SCTU GRM manager. 3. The SCTU GRM manager forwards the complaint to the SCTU payment officer for investigation. 4. The SCTU payment officer liaises with NCTO	SCTU payment officer and NCTO payment officer investigates and resolves	21 DAYS TO 1 MONTH
<b>Payment &amp; Programme ID card issues</b>	My Payment ID Card was stolen/ lost/ burnt/ damaged, etc, please help me to get a new one			

Payment officer as necessary to resolve the issue. Most times, Programme ID cards still under production, will be ready before the next payment cycle.

Where the payment ID Card was with beneficiary before it was lost/stolen/burnt/damaged, etc, he or she will be issued a replacement by the PSP at a Cost to be determined by the PSP

5. The SCTU Payment Officer forwards the findings/reports to the SCTU GRM manager.

8. The SCTU GRM manager updates the register and communicates with the LG GRO who will deliver the feedback to the complainant.

**2.F Payment agent had insufficient funds**

“The payment agent paid 30 people and said his money has finished and we should come back tomorrow but when we returned the next day, he

1. Complaint is received and registered.  
 2. The LG GRO escalates the complaint to the SCTU GRM Manager.  
 3. The SCTU GRM manager forwards to the

SCTU Payment Officer liaises with PSP to resolve, SCTU GRM manager issues response

WITHIN 7 DAYS

could not pay us again” State Payments officer.

4. The State Payment officer liaises with the PSP and ensures that the beneficiaries are paid within 7-10 days.

**2.G  
Unable to reach pay point**

“The road to the pay point was flooded and we could not go there”

“I am very weak/ Aged/Bedridden and find it impossible to reach the paypoint. Please Help me out”

Case 1:

1.Complaint is received and registered.

2. The LG GRO escalates the complaint to the SCTU GRM manager.

3. The SCTU GRM Manager forwards to the SCTU Payment officer.

4. The SCTU payment officer liaises with the PSP to find an alternative pay point.

5. The SCTU payment officer communicates the change in pay point, date, and time to the beneficiaries.

6. SCTU GRM manager resolves the complaint in the register.

Case 2:

1.Complaint is received and registered.

2. The LG GRO escalates the complaint to the

SCTU

payments officer and PSP resolved, SCTU GRM communicates response

2 MONTHS

SCTU GRM manager.  
 3. The SCTU GRM Manager forwards to the SCTU Payment officer.  
 4. SCTU Payment officer liaises with PSP to ensure the person is paid at their house.  
 5. The SCTU payment officer communicates information to the SCTU GRM who ensures the information is communicated to the person, then the complaint is resolved in the register.

**2.H Other payment issues**

“I am yet to receive my Top Up”

“I am qualified for the Livelihood grant but surprisingly, the name of my HH is not included in the list”

**(These could be either TOP UP payment issues, LIVELIHOOD payment issues or any other issue not**

1.Complaint is received and registered.  
 2. The LG GRO escalates the complaint to the SCTU GRM manager.  
 3. The SCTU GRM manager forwards to the relevant SCTU staff for investigation and resolution. SCTU liaises with NCTO as necessary to resolve.  
 5. When resolved, feedback is given to the SCTU GRM manager to update the register and deliver a response to the

SCTU GRM manager and any other relevant SCTU or NCTO staff

WITHIN 2 MONTHS

presently complainant, then  
 contemplate close the  
 d) complaint.

2.I  
 For  
 payment  
 digitalizat  
 ion  
 issues  
 See  
 Annex 3

CATEGORY 3: NASSP-SU SERVICE DELIVERY ISSUES

3.A "The CTF/ LG 1. Complaint is State-level or WITHIN 7  
 GRO/ SOCU / registered. National-level DAYS  
 Mistreatm SCTU Official 2. The State-level GRMs for  
 ent / insulted us" or National-level either  
 rudeness GRM manager, as SCTU/NCTO  
 by staff appropriate, or  
 investigates the SOCU/NASS  
 complaint and CO resolves  
 forwards to the this  
 appropriate  
 National  
 Coordinator for  
 appropriate action  
 to be taken  
 against the official.  
 (The offender may  
 be issued a  
 CAUTION stating  
 never to commit  
 such act again.)  
 3. SCTU GRM  
 Manager issues  
 an apology on  
 behalf of the  
 offender to the  
 complainant.  
 This should  
 include reference  
 to what action was  
 taken against the  
 staff.  
 Once feedback is  
 delivered the  
 complaint should

**3.B  
Complaints not responded to**

“I sent a complaint since but have not received feedback”

be resolved in the register.

1. Complaint is received and registered.

2. The receiving officer MUST apologize to the complainant and then ask for all necessary details to ascertain what happened to the earlier complaint.

3. Where the complaint was registered, the status of that grievance must be passed to the complainant as soon as possible (on the spot, ideally).

5. Where grievance cannot be traced, the receiving officer MUST re-enter the grievance and if it is something that can be answered ON THE SPOT, that should be done.

6. Where it will take a while to resolve, let the complainant be informed of the date for feedback.

7. Complaint should be sent to relevant state-level GRM for fast-tracked resolution and response.

8. The state-level GRM manager should issue a

LG GRO and state-level GRMs at SCTU and SOCU resolve

WITHIN 7 DAYS OR ON THE SPOT

response to the complainant within 7 days.

*This type of complaint should automatically be flagged into the system of the National GRM Managers for immediate consideration*

**3.C Wrong information / poor communication**

“The CBTT/CTF/ told us to meet at Buruku for the meeting but when we got there, we were told they were at Gbako community”

“We were told payment will be on Tuesday and from ward to ward but am surprised there is a change without corresponding communication.”

1. Complaint is received and registered.
2. The receiving officer MUST apologize to the complainant for that mistake.
3. The receiving officer then asks for details of the CBTT or CTF or any other officer who failed to disseminate good information.
4. Complaint is referred to the state-level GRM manager and relevant SOCU/SCTU official for investigation and appropriate action to be taken against him (e.g. a CAUTION may be issued so that such an act will not be repeated).
6. Feedback is sent to the state-level GRM who ensures feedback is delivered to the complainant and

State-level GRMs at SOCU/SCTU plus relevant SOCU/SCTU staff (e.g. training officers)

ON THE SPOT OR WITHIN 7 DAYS

<b>3.D Other Service Delivery Issues</b>	<i>The CTF, CBTT, LGGRO/SCT U/SOCU staff were not on time for our sessions</i>	<p>the complaint is resolved.</p> <p>1. Complaint is received and registered.</p> <p>2. The receiving officer MUST apologize to the complainant and get all relevant details to enable an investigation and appropriate action.</p> <p>3. The receiving officer refers the details to the appropriate state- or national-level GRM manager for action.</p> <p>6. Relevant GRM manager issues response/feedback and ensures feedback is delivered to the complainant and the complaint is resolved.</p>	SGRMMs & NGRMM/ NGRMOs	ON THE SPOT OR WITHIN 7 DAYS
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**CATEGORY 4: FRAUD AND CORRUPTION ISSUES**

<b>4.A Bribe &amp; Extortion</b>	<p>1.” CBTT/ LG GRO/ CTF/Ward head/ Paramount Ruler always receives N3,000 from me after every payment”</p> <p>2. “CTF/CBTT/L G GRO/ collects N500 from me</p>	<p>Complaints in this category can be made via hotline, emails, letters, in person.</p> <p>1. Complaints are registered</p> <p>2. Where the complaint is received at the State level, the SGRMM forwards the same direct to respective National GRM Manager.</p>	<p>SGRMMs, NGRMMs for NASSCO and NCTO as well as the NASSCO and NCTO Coordinators.</p> <p>The NC and/or The NPC decides on appropriate action to take to punish the</p>	21 DAYS OR MORE
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before payment.'

3. The Enumerator/ CBTT demand I pay money before my HH is Enumerated/ Targeted

4. \_\_\_\_\_ "The SOCU/ SCTU staff over there, said if I do not give him money, he will not attend to me"

3. The relevant National GRM manager reports the complaint to respective National Coordinators for directives.

4. The Programme Coordinator, depending on the enormity of the grievance, investigates directly AND/OR delegates the national GRM team to investigate the veracity or otherwise of the allegations made out against the staff and report back immediately.

5. As soon as investigations are concluded, reports are sent to the National Coordinator for appropriate action to be taken

The coordinator may, for example, choose to:

- Issue a CAUTION (providing an official warning) to the offending staff
- Report the offender to the community leader, Village head or constituted authority to be dealt with in a

staff who were found guilty. It could be either or all the following, depending on the grievance complained about:

Offender may be Removed from the programme.

Offender may likely be blacklisted to deter others:

customary way for non-staff

- The offender may be made to pay back all he received dishonestly

- Depending on the gravity of the case, it may be referred to EFCC, ICPC, DSS for further prosecution.

7. Resolution is communicated to relevant GRM manager for entry into the register and he or she will issue a response to the complainant.

**4.B**

**Misappropriation / Theft**

“Our Treasurer/Group member ran away with all our contribution “

1. Complaint is received and registered.

2. The NCTO GRM manager reports the complaint to the NPC for further directives.

4. The National Programme Coordinator, depending on the enormity of grievance, investigates directly AND/OR delegates the National GRM to investigate and feedback.

5. As soon as investigations are concluded, reports are sent to the NPC who decides on the appropriate

NCTO GRM 21 DAYS manger and the NPC investigate and resolve

action to take. The NPC may, for example, choose to:

- Remove the treasurer/group member from the program
- Require the offender to pay back the money
- Involve the DSS for further prosecution where necessary

6. The NCTO GRM manager enters the response into the register and ensures it is delivered to the complainant before the complaint is closed.

**4C. Misrepresentation / Impersonation**

1. "The CBTT/CTF changed bona fide HHs for fake ones after collecting some money from them"

2. "The CBTT/CTF did not write down accurate detail of my HH"

1. Complaint is registered.
2. Where the complaint is received at the State level, the SGRMM or the SOCU GRMM forwards the same to the National GRM Manager.
3. Relevant National GRM manager reports the complaint to the relevant Coordinator for further directives.
4. The coordinator, depending on the enormity of the grievance

NASSCO & 2 MONTHS  
NCTO  
National GRM and Coordinators investigate and resolve

**THE RE-ENROLMENT PROCESS TO BE UNDERTAKEN FOR THE AFFECTED HH TAKES A WHILE**

delegates the national GRM to investigate and report back.

5. When investigations are concluded and reports are sent to the coordinator, they determine the course of action to be taken. This may include:

- Removal of wrong people from the programme and re-enrollment of the correct HH.

- Blacklisting to deter others:

- Financial Penalty. The offender is made to pay back all he received dishonestly

- Involve the DSS for further prosecution

6. Resolution is communicated to relevant GRM manager for entry into the register and issuing a response to the complainant before the complaint can be closed.

## CATEGORY 5: DATA ERRORS AND UPDATES

### 5.A Incorrect HH data

My HH name was wrongly spelt by CBTT/CTF

1. Complaint is received and registered.  
2. Relevant State GRM Manager sends the

SOCU/SCTU GRM managers and SOCU HOP, NASSCO Enrolment 1 MONTH

The information about my HH is incorrect (not all members are registered, you have the wrong gender for one of my children, etc.)

complaint to the Head of Operations SOCU to resolve.

3. SOCU investigates and follows SOP for SR update to reverse the wrong information.
4. SOCU GRM communicates NASSCO GRM manager for update.
5. The SOCU GRM sends feedback to the complainant.
6. NASSCO GRM manager updates the enrolment officer at NCTO to update the NBR.

**5.B  
Missing  
HH data**

During targeting /enrolment, the CBTT/CTF switched different wards and communities, and our information is another Community, Ward, LGA. Please help us

1. Complaint when received is entered into the register.
2. The LG GRO sends a complaint to the State GRM managers (SOCU/SCTU).
3. The State GRM manager at SOCU investigates the complaint. Where it is found to be true, the SCTU GRM also investigates the complaint.
4. The National GRM officer enters the complaint into the Register and sends the complaint to the Enrolment Officer

The CBTT &OR the ENROLMENT Officers investigate and ensure the right information is inputted and necessary changes are made

2 MONTHS

or Zonal NASSCO Officer to resolve, depending on the nature of grievance.

(The enrolment unit has steps that will be followed to resolve this)

5. when the complaint is resolved, the enrolment of Zonal NASSCO officer feeds back to the National GRM officer

6. The National GRM manager updates the register by marking it as Resolved on the dashboard.

7. The National GRM officer feeds back to the State GRM Manager who will ensure feedback is made to the complainant.

**CATEGORY 6: INQUIRIES AND INFORMATION REQUESTS**

**Inquiries and information requests**

<p>Please, I want to know when this program will end or is it forever?</p> <p>'When are we going to receive the next payment?'</p> <p>'Please what is the essence of</p>	<p>Any of the receiving officers registers the complaint.'</p> <p>'Where the receiving officer has no idea about the inquiry, he/she forwards to the SGRMM'</p> <p>'The SGRMM liaise with the state officers concerned to</p>	<p>SCTU/NCTO GRM MANAGERS &amp; OFFICERS</p>	<p><i>Within 7 days</i></p>
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this program?' provide the information'

'How can one qualify as a top up beneficiary?' When the SCTU cannot provide the information, the SGRMM escalates it to the NGRMM who will liaise with responsible National officers to provide the information and give feedback through the SGRMM'

### CATEGORY 7: OTHERS

#### 7.A Fragility/Insecurity

1. "Herdsmen are always waiting along the way to the communities to harm us; we cannot go out again"

2. "Due to the present unrest, most of the CTFs could not go out to coach and mentor "

1. Complaint is received and registered.

2. The payment officer will be notified at once by either the SCTU or NCTO GRM manager who will liaise with payment agents so that the arrears of the affected beneficiaries can be computed and paid to them at another location which will be safe for them.

3. The new location must be adequately communicated to the beneficiaries.

4. When they have been paid their arrears successfully, the register/dashboard can be updated appropriately.

SCTU and NCTO GRM Managers and National Coordinator liaise with the PSPs to resolve

7 TO 21 DAYS FOR RESOLUTION

5. There will be no need for feedback as that was done the moment location was changed and arrears paid to them. However, the GRM manager should update the register and close the complaint once the communities have been notified of alternate payment date/location.

**7.B  
Natural  
disaster**

1. "Due to occurrence of the natural disaster in our community, we could not go out for payment and some of us have lost our payment cards to fire/ disaster/ theft, etc; this has made it difficult for us to access payment, what do we do now?!"

2. The natural disaster prevailing in our communities has stalled enrolment, coresponsibility and other activities from taking place

This is an Act of God, and one cannot be blamed for this; however, these are the steps to be taken:

1. Complaint is registered
2. The relevant officer will be notified at once by either the SGRMM or the NGRMO so next action can be taken for the affected beneficiaries.

There will be no need for feedback as that was done the moment location was changed and

LG-GRO and SGRMM investigate and escalate it to NGRMM who will liaise with the relevant officers for resolution.

**ONE  
MONTH**

<p><b>7.C</b>  <b>Complain</b>  <b>ts OR</b>  <b>INQUIRY</b>  <b>for other</b>  <b>programs</b></p>	<p>in our communities          "I want help for my business, please which government programme will help me"?</p>	<p>arrears paid to them          1.The complaint is received.          2. The complainant is referred to the appropriate intervention e.g. GEEP, Trader Monie, N-Power, etc.          3. Response is issued to the complainant with information of who the complaint was referred to and the complaint is closed in the register.</p>	<p>SGRMM,          NGRMM,          SOCU/NASS          CO and          Enrolment          Officer.</p>	<p><b>ON THE</b>  <b>SPOT</b></p>
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<p><b>7.D</b>  <b>Beneficia</b>  <b>ries</b>  <b>desiring</b>  <b>to exit the</b>  <b>program</b></p>	<p>"I have a job now and I do not want to keep collecting the stipend, please remove my name from the NBR and NSR"</p>	<p>1. Complaint is received and registered.          2. SCTU and/or SOCU GRM managers forward complaints to the enrollment or targeting officers.          3. For NSR updates/deletions, the SOP for SR update is followed.          4. For NBR updates/deletions, report is sent to the NCTO GRM manager who will then inform the NCTO Enrolment and Payment officers to delete same from the NBR and Payment schedule respectively.</p>	<p>State-level          GRM          managers          liaise with          relevant State          and national          staff to affect          the removal of          the HH from          the NSR          and/or NBR</p>	<p><b>7 TO 14</b>  <b>DAYS</b></p>
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7. SCTU and/or  
SOCU GRM  
managers record  
the outcome in the  
register and issue  
a response to the  
complainant  
before closing the  
complaint.