

REPUBLIC OF GHANA



MINISTRY OF EDUCATION

**SECONDARY EDUCATION TRANSFORMATION FOR  
ACCESS, RELEVANCE AND RESULTS FOR JOBS (STARR-J)  
PROJECT (P514793)**

**DRAFT RESETTLEMENT  
FRAMEWORK  
(RF)**

**APRIL 2026**

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## Abbreviations and Acronyms

<b>ADR</b>	Alternative Dispute Resolution
<b>AER</b>	Annual Environmental Report
<b>CEA</b>	Complementary Education Agency
<b>CENDLOS</b>	Centre for National Distance Learning and Open Schooling
<b>CHPS</b>	Community-Based Health Planning System
<b>CTVET</b>	Commission for Technical and Vocational Education and Training
<b>EIA</b>	Environmental Impact Assessment
<b>EMP</b>	Environmental Management Plan
<b>EPA</b>	Environmental Protection Authority
<b>ESS5</b>	Environmental and Social Standard 5
<b>FCUBE</b>	Free, Compulsory, Universal Basic Education
<b>GES</b>	Ghana Education Service
<b>GM</b>	Grievance Mechanism
<b>GRM</b>	Grievance Redress Mechanism
<b>LC</b>	Lands Commission
<b>L.I.</b>	Legislative Instrument
<b>LRP</b>	Livelihood Restoration Plan
<b>LUSPA</b>	Land Use and Spatial Planning Authority
<b>LVD</b>	Land Valuation Division of Lands Commission
<b>MMDAs</b>	Metropolitan, Municipal and District Assemblies
<b>NaCCA</b>	National Council on Curriculum and Assessments
<b>NaSIA</b>	National Schools Inspectorate Authority
<b>NMT</b>	Non-Motorised Transport
<b>NTC</b>	National Teaching Council
<b>PAP</b>	Project-Affected Person
<b>PTT</b>	Project Technical Team
<b>PVLMD</b>	Public and Vested Land Management Division of Lands Commission
<b>RF</b>	Resettlement Framework
<b>RP</b>	Resettlement Plan
<b>SHS/STHS</b>	Senior High School / Secondary Technical High School
<b>SMD</b>	Survey and Mapping Division of Lands Commission
<b>STARR-J</b>	Secondary Education Transformation for Access, Relevance and Results for Jobs
<b>TVET</b>	Technical and Vocational Education and Training
<b>TVETS</b>	Technical and Vocational Education and Training Service
<b>VLD</b>	Voluntary Land Donation
<b>WB</b>	World Bank

## Glossary

**Alternative Dispute Resolution (ADR):** A process for resolving conflicts through mediation, negotiation, or arbitration instead of formal legal proceedings to settle disputes related to compensation and resettlement.

**Asset:** Any property owned by a person, group, institution, or agency.

**Associated Facilities:** These are facilities or activities that are not funded as part of the project but, in the judgement of the World Bank, are (a) directly and significantly related to the project and (b) carried out or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist. The World Bank policy on involuntary resettlement may apply to resettlement induced by such facilities.

**Census:** A field survey carried out to identify and determine the number of persons affected by the project activities or displaced due to land acquisition and related impacts. The census provides basic information needed to establish eligibility for resettlement assistance and compensation entitlements, and livelihood restoration measures., from consultations with affected communities and other relevant stakeholders. The census also serves as the basis for establishing a project cut-off date.

**Cost of Disturbance:** The reasonable expenses incidental to any necessary change of residence or place of business by any person having a right or interest in the land. This can either be determined and paid separately or factored into the valuation rate to be applied.

**Compensation:** Payment in cash or kind for land, property, crops, or other assets acquired or affected by the project, calculated at full replacement cost without depreciation.

**Cut-Off Date:** The specific date for eligibility for compensation and resettlement assistance as established. Any person or asset not identified before this date will not be eligible for compensation.

**Displaced Persons:** People or entities directly affected by a project through the loss of land and the resulting loss of residences, other structures, businesses, or other assets.

**Economic Displacement:** Loss of income streams or means of livelihood resulting from compulsory land acquisition or obstructed access to resources (land, water, or forest) which results from the construction or operation of a project or its associated facilities.

**Eligibility:** The criteria for qualification to receive benefits under a resettlement programme.

**Entitlements:** The benefits set out in the resettlement instrument (RF, RAP), including financial compensation; the right to participate in livelihood restoration programmes; housing, house sites and service provision; and transport and other short-term assistance required to resettle or relocate.

**Full Replacement Cost:** The method of valuation of assets that helps determine the amount sufficient to replace lost assets and cover transaction costs associated with asset replacement. In applying this method of valuation, depreciation of structures and assets is not to be considered.

**Grievance Mechanism (GM):** A formal system established to receive, assess, and resolve complaints or grievances from affected persons, communities or other stakeholders during the project's implementation.

**Institutional Capacity Building:** Strengthening the skills, resources, and structures of organisations involved in the resettlement and urban mobility process to ensure effective implementation.

**Involuntary Resettlement:** Resettlement is involuntary when it occurs without the informed consent of the displaced persons or if they give their consent without having the power to refuse resettlement.

**Land Acquisition:** Methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilised land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. “Land” includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.

**Livelihood:** This refers to the full range of means that individuals, families, and communities utilise to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering.

**Livelihood Restoration:** Measures taken to ensure that affected persons can restore or improve their income levels and quality of life following displacement or loss of assets.

**Non-Motorised Transport (NMT):** Modes of transport that do not use engines, such as walking, cycling, or using wheelchairs, are promoted to enhance accessibility and sustainability.

**Project-Affected Person (PAP):** Any person who, as a result of the implementation of the project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, pasture or undeveloped/unused land), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Affected people might be displaced either physically (“Physically Displaced People”) or economically (“Economically Displaced People”). It includes all affected persons with and without title to the land they occupy.

**Physical Displacement:** Loss of shelter and assets resulting from compulsory land acquisition or restrictions on land use associated with the project, requiring affected persons to move to other locations.

**Project Technical team (PTT):** The dedicated team within Ministry of Education responsible for coordinating, managing, and monitoring all activities under STARR-J Project, including resettlement, compensation, and grievance management.

**Resettlement:** The process of relocating individuals or communities displaced by the project, ensuring access to adequate housing, services, and livelihood opportunities.

**Resettlement Assistance:** Measures to ensure that displaced persons who require to be physically relocated are assisted in material or psychosocial means, whichever is applicable for ease of relocating and restoration of livelihoods.

**Resettlement Plan (RP):** A detailed plan outlining the steps and measures to be taken to address the impacts of displacement, including compensation, relocation, and livelihood restoration.

**Resettlement Framework (RF):** A document that sets out the guiding principles, organisational arrangements, and procedures for managing involuntary resettlement under the project.

**Vulnerable Groups:** Individuals or groups who may be disproportionately affected by the project and require additional support, such as women, children, older people, persons with disabilities, and low-income households.

**World Bank Environmental and Social Standard 5 (ESS5):** The World Bank's environmental and social standard for managing risks related to land acquisition, restrictions on land use, and involuntary resettlement, which guides STARR-J Project's resettlement processes.

## Executive Summary

The World Bank will support the Ministry of Education and its sector agencies in implementing the **Secondary Education Transformation for Access, Relevance and Results for Jobs (STARR-J) Project**. The objective of the STARR-J is to expand access to, and improve the quality and relevance of, secondary education in Ghana. The project will support (i) Increasing equitable access to secondary schools; (ii) Improving Quality and Relevance of programs in Secondary Schools; and (iii) Strengthening systems for assessment, data and evidence-based decision-making. The project will be implemented nationwide, benefiting approximately **2.3 million people**, including **2.2 million students and 100,000 teachers** across all 16 regions.

### Anticipated Impacts

Project activities likely to involve land acquisition or restrictions on land use include:

- Rehabilitation of **150 existing schools**
- Strategic upgrading of **50 schools**
- Construction of **7 new schools** in underserved districts
- Completion of **3 E-Block schools**

These may result in **physical displacement** (loss of shelter) or **economic displacement** (loss of livelihoods).

### Purpose of the Resettlement Framework

Because specific sites and land requirements are not yet determined, this **Resettlement Framework (RF)** provides guiding principles, institutional arrangements, and procedures for preparing site-specific **Resettlement Plans (RPs)** once project locations are confirmed. It ensures compliance with Ghana's legal framework (**1992 Constitution, Land Act, 2020 (Act 1036)** and related legislation) and the World Bank's **Environmental and Social Standard 5 (ESS5)** on land acquisition, restriction on land use and involuntary resettlement, which takes precedence where gaps exist.

### Core Objectives and Principles

The RF emphasizes:

- **Avoiding or minimizing involuntary resettlement** through design alternatives.
- **Preventing forced eviction** and ensuring legal protections.
- **Fair and timely compensation** at full replacement cost.
- **Livelihood restoration** and relocation assistance for affected persons.
- **Special support for vulnerable groups** (women, children, elderly, persons with disabilities, low-income households).
- **Transparent, participatory planning** with meaningful community engagement.
- **Accessible grievance redress mechanisms** to resolve disputes promptly.

### Implementation Arrangements

Implementation responsibilities are clearly defined. The Ministry of Education, through its Project Technical Team (PTT), will lead resettlement planning and coordination. The Lands Valuation Division will validate valuations and compensation claims, while the GES, TVET Service, CTNET, MMDAs, traditional authorities, and other partners will facilitate community engagement, disclosure, land verification, and monitoring. The RF provides for capacity strengthening to ensure these institutions can effectively fulfil their roles.

Funding arrangements outline that land acquisition, compensation, and livelihood restoration will be financed by the Government of Ghana from its Consolidated Fund. The Ministry of Education will establish an escrow account to lodge and ring-fence land acquisition and resettlement compensation funds to avoid delays in payment of compensation.

### **Grievance Redress Mechanism**

A multi-tier, SEA/SH-sensitive Grievance Redress Mechanism (GRM) is included to ensure that students, staff, communities and PAPs have accessible, confidential, and timely avenues to express concerns and seek redress. The mechanism integrates both school-level and project-level structures, while maintaining clear procedures for receiving, verifying, resolving, and escalating grievances, including those related to compensation, land ownership, and protection from SEA/SH and child labour.

### **Conclusion**

The RF ensures that resettlement under the STARR-J Project is managed as a **development opportunity**, safeguarding the rights and livelihoods of affected persons while enabling Ghana to expand equitable, quality secondary education. It provides a structured, transparent, and ESS5-compliant framework to guide future site-specific Resettlement Plans.

## A. Introduction

1. The World Bank will support the Ministry of Education and its sector agencies in implementing the **Secondary Education Transformation for Access, Relevance and Results for Jobs (STARR-J) Project**.
2. The objective of the STARR-J is to expand access to, and improve the quality and relevance of, secondary education in Ghana. The project will support (i) Increasing equitable access to secondary schools; (ii) Improving Quality and Relevance of programs in Secondary Schools; and (iii) Strengthening systems for assessment, data and evidence-based decision-making.
3. Project activities will be implemented nationwide across all 16 regions of Ghana benefitting an estimated 2.3 million people during the implementation period. The program will reach all public senior secondary schools (SHS/STHS: 723, TVET: 233).
4. Accordingly, approximately 2.2 million students, 100,000 teachers and school principals are expected to benefit directly from project interventions during the implementation period. The main primary beneficiaries are students enrolled in public general secondary and technical and vocational education and training (TVET) institutions that receive project financed investments. This includes students in newly constructed, expanded, or rehabilitated schools, as well as those benefiting from upgraded classrooms, laboratories, workshops, digital learning infrastructure, and improved teaching and learning materials. The project will prioritize students from underserved, including rural and peri urban communities and districts with limited secondary school coverage.
5. The following sub-components and/or subprojects are likely to require land acquisition and/or restrictions on land use, which could lead to physical and/or economic displacement:
  - Subcomponent 1.1: Rehabilitate and upgrade existing secondary schools
    - Rehabilitation of 150 schools with limited infrastructure
    - Strategic upgrading of 50 schools (30 Category C to B; 20 Category B to A)
  - Subcomponent 1.2: Construct and complete new secondary schools
    - Construction of 7 new schools in underserved districts and in population-dense peri-urban areas
    - Completion of 3 E-Block schools
6. This Resettlement Framework (RF) has been prepared because the **specific locations and exact areas of impact for these project activities are currently unknown**, making it infeasible to prepare site-specific Resettlement Plans (RPs) at this stage.
7. This RF will guide the preparation of future RPs as soon as the necessary information becomes available, including precise land requirements and data on affected populations.
8. The following sections will delineate the principles, organizational arrangements and criteria that will govern the formulation of RPs for subprojects or project components during project implementation. Project authorities will ensure that no such displacement occurs until these plans are finalized by the MoE, validated by the Land Valuation Division of Lands Commission and approved by the World Bank.

## B. Core Objectives and Guiding Principles

9. This section outlines the fundamental goals and operational principles that will govern the development of RPs, which will address any physical or economic displacement resulting from land acquisition or restrictions on land use associated with subprojects or project components. They will adhere to the core objectives and principles of **ESS5 (Environmental and Social Standard 5)**, ensuring equitable and effective outcomes for all affected persons.

10. **Core Objectives:** RPs will be designed to achieve the following core objectives of ESS5, where applicable:

- **Avoid or Minimize Involuntary Resettlement:** This involves exploring project design alternatives to prevent or significantly reduce displacement.
- **Prevent Forced Eviction:** RPs will ensure that no individuals or families are removed from their homes or land without appropriate legal and other protection, including all applicable ESS5 procedures and principles.
- **Mitigate Unavoidable Adverse Impacts:** When displacement is unavoidable, RPs will include measures to compensate for asset loss at **replacement cost** (as detailed in Section I, Methods of Valuing Affected Assets), and to assist displaced persons to improve, or at least restore, their livelihoods and living standards to pre-displacement levels or to levels prevailing before project implementation, whichever is higher.
- **Improve Conditions for Vulnerable Persons:** For poor or vulnerable individuals who are physically displaced, RPs will provide **adequate housing, access to services and facilities, and security of tenure**. Security of tenure ensures that resettled individuals or families can legally occupy a site and are protected from the risk of eviction.
- **Implement Resettlement as Sustainable Development:** Resettlement activities must be conceived and executed as sustainable development programs, with sufficient investment resources to enable displaced persons to directly benefit from the project, as warranted by its nature.
- **Ensure Transparent and Participatory Planning:** Resettlement activities will be planned and implemented with appropriate **information disclosure, meaningful consultation, and the informed participation** of affected individuals and communities.

11. **Key Principles:** The following principles will guide the development of RPs, where applicable, ensuring equitable and effective resettlement outcomes:

- **Fair and Timely Compensation:** Project authorities will compensate for the loss of land and other assets at **replacement cost** and will take possession of the acquired land only after compensation has been made available and, where applicable, physically displaced people have been resettled and moving allowances have been provided.
- **Safeguarding Land-Based Livelihoods:** If displaced persons' livelihoods are land-based, they will be offered the option of **replacement land**, unless equivalent replacement land is genuinely unavailable.

- **Addressing the Needs of Vulnerable People:** All persons adversely impacted by land acquisition or restrictions on land use are entitled to compensation and benefits under ESS5, including those without formal legal rights to the land they occupy (refer to Section G, Eligibility for Benefits under Resettlement Plans).
- **Relocation Assistance:** Physically displaced persons will receive assistance to improve or at least restore their living standards.
- **Livelihood and Income Restoration:** Persons who lose their jobs or livelihoods will be assisted in their efforts to improve or at least restore their incomes and livelihoods.
- **Community Engagement:** Decision-making processes related to resettlement and livelihood restoration will include options and alternatives from which affected persons can choose. Relevant information will be disclosed, and meaningful participation of affected communities and persons will occur during the consideration of alternative project designs, and throughout the planning, implementation, monitoring, and evaluation of the compensation, livelihood restoration, and relocation processes.
- **Grievance Redress:** A grievance mechanism will be established early in project development to address specific concerns about compensation, relocation, or livelihood restoration measures raised by displaced persons (or others) in a timely manner.

## C. Legal, Policy and Regulatory Framework

12. This section focuses on the practical **application of the legal, policy and regulatory framework** for compulsory land acquisition and land use restrictions in Ghana. It shows how national legal provisions will be applied to fulfill subproject or project components land requirements while ensuring full compliance with ESS5. The section also details how direct negotiations will be structured to achieve ESS5-compliant compensation, identify other relevant legislation for addressing displacement, and clearly articulate strategies for bridging any gaps between national requirements in Ghana and ESS5 requirements.

### 13. Overview of Relevant ESSs, notably ESS5

The **World Bank Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement** establishes requirements to avoid or minimize involuntary resettlement and to mitigate adverse social and economic impacts when land acquisition or access restrictions cannot be avoided. Its core objective is to ensure that project-affected persons are meaningfully consulted, compensated at full replacement cost, assisted in restoring (and ideally improving) their livelihoods, and provided with grievance redress avenues. ESS5 emphasizes avoiding forced eviction, protecting vulnerable groups, ensuring security of tenure, and restoring livelihoods through measures such as livelihood assistance, transitional support, and monitoring of outcomes. It reinforces the principle that development projects should not impoverish people or expose them to disproportionate risks because their land or access to resources is impacted.

A key requirement under ESS5 concerns **Voluntary Land Donation (VLD)**, which is permitted only under strict conditions to ensure the process is genuinely voluntary, well-documented, and free of coercion. ESS5 requires that donors are fully informed of their rights, that the land being donated is minor and does not affect the donor's livelihood, that alternative options are considered, and that documentation—including written consent and verification by third parties—is maintained.

### 14. Overview of National Laws, Regulations and Policies

The relevant national laws and policies are presented as follows:

- The 1992 Constitution of the Republic of Ghana
- Ghana Pre-Tertiary Education Act, 2020 (Act 1049)
- The Land Act, 2020 (Act 1036)
- The Lands Commission Act, 2008 (Act 767)
- Administrator of Stool Lands Act, 1994 (Act 481)
- Survey Act, 1962 (Act 127)
- Lands (Statutory Wayleaves) Act, 1963 (Act 183)
- Environmental Protection Act, 2025 (Act 1124)
- Environmental Protection (Environmental Assessment) Regulations, 2025 (L.I. 2504)
- Land Use and Spatial Planning Act, 2016 (Act 925)
- The Local Governance Act, 2016 (Act 936)
- Lands Commission Act, 2008 (Act 767)

- Persons with Disability Act, 2006 (Act 715).
- Ghana Institution of Surveyors Valuation Standards - 2022
- National Land Policy (1999)
- Ghana National Gender Policy, 2015

### 15. Comparison of Ghanaian Regulations and the World Bank's ESS 5

Gap analysis between Ghanaian Regulations and the World Bank standards, ESS5, will be conducted during the Resettlement Planning and where there are gaps and discrepancies, the Bank's requirement will take precedence (see Annex F). RP will be prepared by following ESS5 requirements.

### 16. Overview of Land Acquisition Procedures: Key Steps, Legal Basis, and Rights of Affected Persons

Compulsory acquisition in Ghana is governed by Land Act, 2020 (Act 1036), Part V (Acquisition of Land). The process is designed to ensure due process, transparency, fair compensation, and protection of rights of affected landowners and occupants.

Below are the anticipated key steps and how they are executed in practice.

#### i. Identification of Public Purpose and Justification for Acquisition

##### ***Legal Basis:***

Act 1036, Sections 236–238: Government (acting through the Lands Commission) may acquire land compulsorily only for a public purpose or public interest.

Act 1036 Section 236(2) requires the acquiring authority to ensure *adequate funds are available before the acquisition process begins*.

##### ***Practical Application:***

- The acquiring agency (e.g., MoE/GES for school projects) identifies land needed for a project based on engineering designs or feasibility studies.
- Agency must demonstrate necessity and public interest, e.g., school improvements, infrastructure, public safety, utilities.
- Escrow (though not legal requirement) is used by Lands Commission as a **practical mechanism** to demonstrate compliance with Section 236(2), especially for large or donor-funded projects.

##### ***Rights of Affected Persons:***

- PAPs have the right to be informed of the intention to acquire their land.
- They may question whether the stated purpose is genuinely a *public purpose*.

#### ii. Notification of Intention to Acquire

##### ***Legal Basis:***

Act 1036, Section 239: Government (acting through the Lands Commission) must publish a **Notice of Intention to Acquire**.

##### ***Practical Application:***

- Notice is published in the **Gazette**, and at least one newspaper, and posted locally.

- Notices are also served on traditional authorities, District Assemblies, and affected families/stools.

***Rights of Affected Persons:***

- Right to be **formally notified** and to understand the nature and purpose of the intended acquisition.
- Right to submit inquiries or lodge objections within the prescribed period.
- Occupants cannot be forcibly evicted at this stage.

**iii. Entry for Survey, Enumeration, and Impact Assessment**

***Legal Basis:***

Act 1036, Sections 241–243: Government (acting through the Lands Commission) may enter the land to conduct surveys after providing notice.

***Practical Application:***

Survey teams enter the land to:

- Conduct cadastral surveys
- Take inventory of assets, crops, structures
- Identify all interest holders (stool, family, freeholders, leaseholders, tenants, licensees)

***Rights of Affected Persons:***

- Must be given **reasonable notice** prior to entry.
- Must allow lawful entry but may request identification from officials.
- Right to be **present during survey** and verify asset inventory.
- Entitled to compensation for any *damage* caused during survey works.

**iv. Stakeholder Consultation and Claims Identification**

***Legal Basis:***

Act 1036 requires that **all persons with legitimate interests** be identified and consulted by Government (acting through the Lands Commission).

***Practical Application:***

- Engagements with stools, families, individual owners, farmers, tenants, sharecroppers, caretakers.
- Collection of claims and supporting documentation (indentures, allocation notes, receipts, tenancy agreements).

***Rights of Affected Persons:***

- Right to **participate in consultations**.
- Right to submit evidence of ownership or use.
- No one should be excluded on grounds of illiteracy or weak documentation.

**v. Preparation and Publication of the Executive Instrument (EI)**

***Legal Basis:***

Act 1036, Section 240: Compulsory acquisition becomes **legally effective only when an Executive Instrument (EI)** is issued by Government (acting through the Lands Commission).

***Practical Application:***

- The EI defines the land area, purpose, and vesting authority.

- EI is gazetted and becomes the statutory authority for the acquisition.

***Rights of Affected Persons:***

- Acquisition is **official and enforceable** from date of gazette.
- PAPs may challenge the acquisition **only on procedural grounds** (e.g., failure to follow due process).
- PAPs retain rights to **compensation** and **resettlement** where applicable.

**vi. Valuation of Affected Assets and Determination of Compensation**

***Legal Basis:***

Act 1036, Sections 244–246; Valuation principles guided by Land Valuation Division (LVD) of Lands Commission.

***Practical Application:***

- Valuers assess land, structures, economic trees, crops, disturbance, and livelihood impacts.
- Compensation is based on **replacement cost**, not depreciated cost.
- Multiple interest holders must have claims separated and valued individually.

***Rights of Affected Persons:***

- Right to fair, timely, and adequate compensation.
- Right to request a **valuation review** or submit counter-valuation.
- Right to be compensated for:
  - Land
  - Structures
  - Crops/economic trees
  - Disturbance
  - Loss of income/livelihood
  - Relocation assistance

**vii. Negotiation and Agreement on Compensation Packages**

***Legal Basis:***

Act 1036 emphasizes **mutual agreement**, transparency, and fairness.

***Practical Application:***

- LVD conducts negotiations with claimants.
- Where owners are multiple, revenue-sharing rules apply (e.g., stool lands distribution formula).

***Rights of Affected Persons:***

- Right to participate in negotiations.
- Right to be assisted (e.g., by counsel or family heads).
- No coercion or forced agreements are allowed.

**viii. Grievance Resolution and Appeals**

***Legal Basis:***

Act 1036 allows grievances to be resolved through:

- Administrative review

- Alternative dispute resolution
- Courts, as a last resort

***Practical Application:***

Common grievances include:

- Disputes over ownership
- Valuation disagreements
- Delayed payments

***Rights of Affected Persons:***

- Right to lodge grievances without cost.
- Right to judicial review if unsatisfied with administrative or ADR outcomes.

**ix. Payment of Compensation**

***Legal Basis:***

Act 1036, Section 247: Compensation must be **paid promptly** to all eligible persons by the acquiring agency (working through the LVD).

***Practical Application:***

- Payments made through verified bank accounts, mobile money, or approved channels.
- For stools/families, payment goes to recognized **trustees or family heads**, not individuals.

***Rights of Affected Persons:***

- Right to full compensation before displacement.
- Vulnerable persons entitled to support accessing payments.
- Right to receive detailed breakdown of compensation.

**x. Possession and Vacant Site Handover**

***Legal Basis:***

Effective possession can only occur **after compensation has been paid** (Act 1036 requirement for lawful displacement).

***Practical Application:***

- Physical possession and clearance begin only after fulfilling compensation obligations.
- Evictions without compensation would be unlawful.

***Rights of Affected Persons:***

- No eviction before payment.
- For those physically displaced, right to:
  - Relocation assistance
  - Transitional support
  - Restoration of livelihoods

**xi. Documentation, Registration, and Vesting of Title**

***Legal Basis:***

Act 1036 mandates that acquired lands be properly recorded in the national land register by Government (acting through the Lands Commission).

***Practical Application:***

- Lands Commission registers the land in the name of the acquiring authority.
- Boundaries and cadastral maps updated.

***Rights of Affected Persons:***

- Right to access information on the acquisition.
- Right to follow-up on claims or pending compensation.

**17. Dispute Resolution and Court Process for Compensation under Act 1036**

This section outlines the procedures to be followed when compensation negotiations between the acquiring authority and affected persons (APs) are unsuccessful under the Land Act, 2020 (Act 1036) and its legislative framework. It summarizes the statutory process, practical implementation considerations, and the rights and obligations of affected persons. The steps apply to compulsory acquisition undertaken by Government or any entity legally empowered to acquire land for public purposes.

**i. Initial Claims, Negotiation, and ADR**

Affected persons submit compensation claims to the Lands Commission following the publication of the acquisition instrument and notification of affected interests. The acquiring authority—working through the Lands Commission and its Land Valuation Division—reviews the claims, conducts valuation, and initiates negotiation. Where parties disagree on eligibility, valuation methodology, quantum of compensation, disturbance claims, or interest payments, Act 1036 encourages the use of **Alternative Dispute Resolution (ADR)** in accordance with the ADR Act, 2010 (Act 798).

ADR may include facilitated negotiation, mediation, or stakeholder meetings coordinated by the Lands Commission. Although optional, ADR is considered good practice and often serves as a final opportunity to resolve disagreements before court proceedings. If the dispute remains unresolved, either party may refer the matter to the High Court as provided under **Sections 249–255 of Act 1036**.

**ii. Filing for Court Determination**

Where negotiations or ADR fail, Act 1036 requires that disputes on compensation be referred to the **High Court**, which has original jurisdiction over all matters arising from compulsory acquisition. Either the affected person or the acquiring authority may initiate court action.

Typical issues brought before the court include:

- Adequacy of valuation and compensation
- Recognition of affected interests (ownership, tenancy, customary interests)
- Disturbance and livelihood restoration claims
- Applicable interest on delayed payments
- Compensation for injurious affection or severance
- Alleged procedural irregularities

Affected persons have the right to legal representation and to submit evidence, including valuation reports, title documentation, and records of negotiation attempts.

**iii. High Court Proceedings and Determination**

The High Court reviews all submitted evidence and applies the compensation principles under **Sections 248–255 of Act 1036**, which require compensation based on:

- Market value or replacement cost
- Disturbance (including relocation costs, incidental expenses, and business losses)
- Loss of income or livelihood impacts
- Injurious affection and severance
- Any other matter necessary to restore affected persons to at least pre-acquisition living standards

The court may also determine:

- Eligibility and competing claims
- Interest payments (from the date of acquisition to the date of full payment)
- Costs and legal fees where appropriate
- Additional reliefs where the acquisition process breached statutory requirements

Although Act 1036 does not prescribe mandatory timelines for court determination, cases typically progress over several months due to the formal nature of judicial proceedings.

#### **iv. Court-Mandated Compensation and Payment Obligations**

Once judgment is delivered, the acquiring authority is obligated to pay the **court-determined compensation**, interest, and any awarded costs. Payment must be **prompt**, and delays may attract additional interest or legal consequences. The court’s decision is binding on all parties.

Where budget constraints or administrative delays occur, affected persons may seek enforcement through:

- Garnishee orders
- Writ of execution (Fi-Fa)
- Contempt proceedings
- Orders compelling compliance (mandamus)

These mechanisms strengthen the protection of affected persons and ensure enforceability of court decisions.

#### **v. Appeal Process**

Parties dissatisfied with the High Court’s ruling may appeal to the **Court of Appeal**, and subsequently to the **Supreme Court**, following Ghana’s appellate procedures. Appeals do not automatically stay execution unless the court grants a **stay of execution**. This ensures that affected persons are not unduly deprived of prompt compensation while appeals proceed.

#### **vi. Rights and Obligations of Affected Persons**

Affected persons have the right to:

- be informed of the acquisition and their entitlements;
- submit compensation claims supported by evidence;
- participate in negotiations and ADR;
- challenge the adequacy of compensation in court;

- receive compensation at replacement cost plus disturbance and other eligible allowances;
- receive prompt payment once compensation is determined.

Affected persons must:

- provide accurate documentation of claims;
- cooperate during valuation inspections;
- disclose all competing interests where they exist;
- observe timelines where specified in notices issued by the acquiring authority.

## vii. Strengths and Weaknesses of the Court Process

### Strengths

- Provides an independent, transparent, and enforceable mechanism for resolving compensation disputes.
- Ensures compensation at replacement cost and recognizes disturbance and livelihood impacts.
- Offers a wide range of judicial remedies, including interest, damages, and costs.
- Protects vulnerable groups through constitutional and statutory safeguards.

### Weaknesses

- The judicial process can be lengthy, leading to delayed resolution.
- Litigation costs may be prohibitive for vulnerable households without access to legal aid.
- Administrative delays following judgment can prolong the actual receipt of compensation.
- Technical evidence requirements (valuation, survey, title documentation) may be challenging for affected persons.

## 18. Modifications to Standard Act 1036 Procedures to Ensure Full Compliance with ESS5

Although the Land Act, 2020 (Act 1036) provides a strong framework for compulsory land acquisition in Ghana, several enhancements are required to fully align project implementation with the World Bank's **Environmental and Social Standard 5 (ESS5)**. Under the STARR-J Project, the following **project-specific modifications** will be applied:

### i. Compensation at Full Replacement Cost (Beyond Market Value)

ESS5 requires compensation at **full replacement cost**, which includes:

- no depreciation for structures,
- full replacement of equivalent assets,
- transaction and relocation-related costs (registration, transfer fees, labour, transport).

#### **Modification:**

All compensation will be based on **full replacement cost**, even where Act 1036 allows market value. Valuation reports will explicitly add all expenses necessary for restoring the affected asset.

### ii. Inclusion of Livelihood Restoration Measures

Act 1036 focuses primarily on asset compensation.

***Modification:***

The project will implement **Livelihood Restoration Plans (LRPs)** including:

- transitional allowances,
- income-recovery support,
- training and agricultural extension,
- business re-establishment assistance for PAPs experiencing economic displacement.

This ensures PAPs are **restored or improved** relative to pre-project conditions.

**iii. Eligibility of Non-Titleholders and Informal Occupants**

Act 1036 requires legal or customary recognition to determine compensation eligibility.

***Modification:***

ESS5 eligibility criteria will apply, ensuring that:

- squatters, tenants-at-will, encroachers, sharecroppers, and other informal occupants receive support, including compensation for structures/improvements and livelihood assistance, even without formal land rights.

No person will be displaced without mitigation support.

**iv. Special Measures for Vulnerable Groups**

Act 1036 provides only broad guidance for vulnerable persons.

***Modification:***

The RF and RPs will introduce **targeted vulnerability assistance**, including:

- priority compensation processing,
- additional livelihood support,
- tailored engagement methods,
- accompaniment during documentation and payment processes.

Groups covered include elderly persons (60 years and above), female-headed households, persons with disabilities, low-income households, and socially marginalized groups.

**v. Requirement for Payment Before Displacement**

Act 1036 does not expressly prohibit possession prior to payment.

***Modification:***

The project will enforce **strict ESS5 timing requirements**:

- compensation will be fully paid before land possession, construction, or any economic or physical displacement;
- proof of payment will be required before the World Bank issues “No Objection” for civil works.

**vi. Enhanced Public Consultation and Disclosure**

Act 1036 requires notification but does not mandate iterative engagement.

**Modification:**

The project will implement a **continuous stakeholder engagement process**, including:

- disclosure of valuation methods,
- consultation on compensation packages,
- participation in livelihood restoration activities,
- accessible communication in local languages.

**vii. Development and Implementation of Project-Specific RPs**

Act 1036 does not require Resettlement Plans.

**Modification:**

For each subproject involving land acquisition or restriction of land use, a **Resettlement Plan (RP)** will be prepared. RPs will include:

- socio-economic surveys,
- census of PAPs,
- asset inventory,
- livelihood restoration measures,
- monitoring and evaluation frameworks.

**viii. Integration of Voluntary Land Donation (VLD) Safeguards**

**Section 234 of the Land Act, 2020 (Act 1036) of Ghana** states that the **State may acquire land by purchase or accept it as a gift with the owner's consent for public purposes**. Where the State purchases land, the consideration is agreed between the parties; where land is gifted, it may be used for the purpose specified by the donor. The **Lands Commission must prepare and publish standard guidelines** for such purchases and gifts, and a **notice of the instrument relating to the purchase or gift must be published in the Gazette as conclusive proof of acquisition**.

**Modification:**

Any voluntary land donation will follow Section 234 and ESS5 requirements including:

- clear evidence of voluntary choice free from coercion,
- no economic or physical displacement allowed under VLD,
- donor retains at least **90%** of original landholding,
- documented agreement with grievance rights.

**ix. Project-Level, SEA/SH-Sensitive Grievance Mechanism**

Act 1036 relies on Lands Commission processes and courts.

**Modification:**

The project will establish a **multi-tier project GRM** that is:

- accessible at community and district levels,
- equipped to receive confidential grievances including SEA/SH,
- capable of resolving compensation and resettlement-related complaints promptly,
- integrated with national ADR systems but not dependent on courts for primary resolution.

**x. Monitoring and Evaluation Requirements**

Act 1036 does not require monitoring of post-displacement outcomes.

**Modification:**

The project will implement:

- internal monitoring of resettlement implementation,
- external/independent monitoring (if scale of displacement is large),
- post-resettlement audits to verify livelihood restoration.

**19. Procedures for Imposing Land Use Restrictions:**

Act 1036 provides the legal framework for the State or an acquiring authority to impose **restrictions on land use** without necessarily acquiring ownership. Restrictions may relate to environmental protection, road reservations, safety zones, rights-of-way, public utilities, and other public interest purposes. Although less invasive than compulsory acquisition, restrictions can still cause **economic displacement** and trigger compensation obligations.

The key steps are outlined below.

**i. Identification of Public Purpose Necessitating Restrictions*****Legal Basis:***

- Act 1036, Sections 1–3, 9–14 (public purpose and acquisition powers)
- Sector-specific laws (e.g., road reservations, utility corridors, water protection zones)

***Practical Application:***

The acquiring entity (e.g., Government agency, utility, or road authority) identifies the need to impose restrictions such as:

- prohibiting building or farming in a right-of-way,
- limiting tree planting or construction near utilities,
- restricting excavation, mining, or settlement in a designated zone.

***Rights and Obligations of Affected Persons:***

- APs must be informed of the purpose and nature of the restriction.
- APs retain ownership of the land unless compulsory acquisition follows.
- APs have the right to contest the justification for restrictions through the grievance process.

**ii. Preliminary Assessment and Due Diligence*****Legal Basis:***

- Section 247: inspection, surveys, and data collection
- Section 12: environmental and social considerations
- LI provisions (draft regulations) enabling preliminary investigations

***Practical Application:***

Before imposing a restriction, the acquiring authority conducts:

- site surveys,
- mapping of affected plots,
- socio-economic assessments,
- consultations with traditional authorities and landowners.

This stage is critical for determining whether impacts warrant compensation.

***Rights and Obligations of Affected Persons:***

- APs must grant access for surveys without obstruction.

- They must receive prior notice before any inspection.
- They may raise objections during inspections.

### iii. Issuance of Notice of Intention to Impose Restrictions

#### *Legal Basis:*

- Section 12(5): public notices for restrictions by Government (acting through the Lands Commission)
- Sections 13–14: publication requirements (Gazette, media, conspicuous posting)

#### *Practical Application:*

The acquiring authority issues:

- a **Notice of Intention** describing the restriction,
- geographic scope,
- purpose,
- likely impacts,
- the date the restriction becomes effective.

Notices are:

- published in the **Gazette**,
- posted at District Assemblies, traditional councils, and the affected community,
- broadcast on local media where feasible.

#### *Rights and Obligations of Affected Persons:*

- APs are entitled to clear, timely information before restrictions take effect.
- They may submit objections or request clarification.
- They must comply with the notice once restrictions legally take effect.

### iv. Consultations and Receipt of Objections

#### *Legal Basis:*

- Section 33–38: dispute resolution mechanisms
- Section 12: community engagement
- ADR Act (Act 798), read together with Act 1036

#### *Practical Application:*

After the notice is issued, the acquiring authority consults with:

- landowners,
- chiefs and family heads,
- occupants, tenants, and farmers,
- affected institutions (MMDA, Lands Commission).

Objections and comments are formally recorded.

#### *Rights and Obligations of Affected Persons:*

- APs have the right to make written or oral objections.
- APs may propose alternatives or request modification of the restriction.
- The authority must consider and respond to objections.
- APs must abide by the final decision unless they escalate the grievance.

### v. Valuation of Affected Interests and Determination of Compensation

#### *Legal Basis:*

- Sections 243–251 (compensation principles)
- Replacement of damage or loss §245–247
- Compensation for disturbance, loss of earnings, and injurious affection

***Practical Application:***

If restrictions reduce economic use or cause loss of income or assets, the Lands Valuation Division (LVD) assesses compensation for:

- loss of access,
- loss of economic trees or crops,
- injurious affection (reduction in land value due to restrictions),
- relocation of activities,
- disturbance and livelihood impacts.

***Rights and Obligations of Affected Persons:***

- APs must be informed of their right to compensation.
- They may provide evidence of losses (farm records, tenancy agreements).
- They may reject valuations they consider inadequate and seek redress.
- They remain entitled to compensation even if they do not hold documentary land title, as long as they have legally recognizable or customary interests.

**vi. Establishment of Escrow Account for Compensation Funding**

***Legal Basis:***

- Section 236(3): requirement to deposit estimated compensation before acquisition or restriction
- Applies equally to imposition of restrictions that cause compensable impact.

***Practical Application:***

Before implementing the restriction:

- the acquiring authority must deposit estimated compensation into an escrow account managed by the Lands Commission. This ensures availability of funds and prevents delays in payment.

***Rights and Obligations of Affected Persons:***

- APs are guaranteed the availability of compensation funds.
- They may request proof that funds have been secured.
- The authority must not impose restrictions without demonstrating funding availability.

**vii. Issuance of Executive Instrument (EI) for Formal Imposition of the Restriction**

***Legal Basis:***

- Sections 12–14: EI for restrictions
- EI must define the restriction, boundaries, and implementation modalities.

***Practical Application:***

The EI is:

- signed by the Minister responsible,
- gazetted,
- communicated to traditional authorities, District Assemblies, and the Lands Commission.

From the date of the EI, the restriction becomes **legally enforceable**.

***Rights and Obligations of Affected Persons:***

- APs must comply with the restriction once EI is in force.
- They retain the right to compensation and appeal.
- Failure to comply may attract penalties under Act 1036.

**viii. Payment of Compensation and Assistance Measures*****Legal Basis:***

- Section 247: prompt payment
- Section 245: compensation for disturbance and loss
- Section 251: payment modalities

***Practical Application:***

Once valuation is agreed or determined:

- LVD prepares compensation instruments,
- payments are made from the escrow account,
- beneficiaries sign payment receipts,
- any unclaimed funds remain in escrow for future resolution.

***Rights and Obligations of Affected Persons:***

- APs must receive compensation before any enforcement action is taken.
- Compensation must be **fair, prompt, and full**.
- APs may contest the amount through grievance channels.

**ix. Grievance Redress and Dispute Resolution*****Legal Basis:***

- Sections 33–38: ADR and land dispute settlement
- Section 255: right to seek redress in High Court
- ADR Act 798 procedures apply

***Practical Application:***

If disagreements persist, APs may pursue:

1. **Administrative resolution** (District, Regional Lands Commission).
2. **Mediation** (Customary Land Secretariat or ADR mechanisms).
3. **Arbitration** under ADR Act (if mutually agreed).
4. **Judicial review**—final determination by the High Court.

***Rights and Obligations of Affected Persons:***

- APs have unrestricted access to dispute resolution mechanisms.
- Authorities must not enforce restrictions or displacement before disputes on compensation are resolved.
- APs may retain legal representation.

**x. Monitoring and Compliance Enforcement*****Legal Basis:***

- Lands Commission Act and sector-specific enforcement laws
- Duty to enforce restrictions once in effect

***Practical Application:***

Authorities monitor compliance with:

- prohibitions or limitations set in the EI,
- environmental, safety, or construction-related restrictions.

***Rights and Obligations of Affected Persons:***

- APs must comply with the restriction conditions.
- They may report excessive enforcement or violations.
- They retain rights to ongoing compensation if long-term impacts occur.

## D. Processes for Preparing and Implementing Resettlement Plans

20. When a proposed subproject or project component displaces people physically or economically, or may impose restrictions on use of, or access to land, a **Resettlement Plan (RP)** will be prepared, reviewed, and approved internally before being submitted to the World Bank for final approval. This section details the steps involved in this critical process.

### Implementation Arrangements

21. The Ministry of Education (MoE) is the primary implementing agency and is responsible for overall project implementation and compliance with the RF. The MoE will establish a Project Technical Team (PTT) at the central level, which will include dedicated full-time Social and GBV Specialists responsible for day-to-day oversight of RF implementation across all project components.

22. The TVET Service and Ghana Education Service (GES) will manage school-level infrastructure activities, with designated Regional and District E&S Focal Points in all 16 regions responsible for site-level supervision, contractor oversight, community engagement, and grievance redress at the regional and district levels.

23. Capacity building for all parties responsible for implementing the RF — including MoE, TVET Service and GES central and regional staff, district focal points, school management, and contractors — will be provided through a structured training program. Training will be delivered through a combination of centralized workshops, regional training sessions, and on-site coaching by the PTT E&S Specialists and World Bank implementation support missions.

24. Upon defining the footprint of a proposed subproject or project component, the Ministry of Education, Project Technical Team (PTT) will conduct a thorough land use assessment. This assessment identifies any potential physical or economic displacement resulting from land acquisition and/or land use restrictions. If, after exploring alternative sites and design options, involuntary resettlement proves unavoidable, the Ministry of Education, Project Technical Team (PTT) will initiate the preparation of an RP.

25. The Ministry of Education, Project Technical Team (PTT) holds primary responsibility for preparing RPs. The core team for carrying out this task will typically include:

- **Social Scientists/Resettlement Specialists:** Responsible for conducting socio-economic surveys, identifying project-affected people, and ensuring the RP aligns with social impact mitigation principles.
- **Land and Estate Valuers:** Tasked with carrying out inventory and valuation of affected assets and advising on compensation frameworks.
- **Community Engagement Officers:** Responsible for facilitating consultations with affected communities and ensuring their input is incorporated into the plan.

26. Their key responsibilities collectively include developing relocation and/or livelihood restoration strategies (if applicable) and drafting an RP that meets the requirements of **Environmental and Social Standard 5 (ESS5)**. If other agencies, jurisdictions, project contractors, or parties are involved in the preparation process, their specific roles and responsibilities will be clearly defined and coordinated by the Ministry of Education, Project Technical Team (PTT).

27. The underlisted steps will be required if a sub project involves restriction of access to land use and/or involuntary resettlement, and a resettlement plan is to be prepared.

- **Environmental and Social Screening**

The sub project activities, site and environs will be screened to confirm if:

- The subproject will involve land acquisition.
- Implementation of subproject/activity will impact on livelihoods and assets (structures, crops/economic plants and cultural heritage resources) of people; and
- Implementation of subproject activities will also cause physical or economic displacement of people.

If any of the above situations arise, then, a resettlement plan shall be prepared, in line with World Bank ESS5 and relevant national laws, for Bank approval and implementation prior to land take and commencement of any civil works. If otherwise, the sub project may be implemented, subject to the approval of the sub project ESMP or ESIA by the World Bank (**see Annex A for screening checklist**).

- **Preparation of Terms of Reference (ToR) for RP**

Once it is established that an RP will be prepared for the sub project or project component. The Ministry of Education, Project Technical Team (PTT) will prepare Terms of Reference (ToR) for review and approval by the World Bank to guide the recruitment of a consultant who will prepare the resettlement plan as per the guidance provided by the ToR. Such ToRs typically include background, objectives and scope of the assignment, duration, staff requirements, deliverables, and payment and reporting schedule, ensuring alignment with the project design and requirements of ESS5 and applicable laws in Ghana.

- **Preparation of RPs**

The Ministry of Education, Project Technical Team (PTT) will prepare the RP based on ESS5 requirements and Ghana law. The preparation of the RP will involve a census and socio-economic survey of PAPs and inventory/valuation of their assets on site as well as stakeholder consultation.

A typical RP for a sub project includes the following thematic areas:

- Introduction (Background, objective of the RP, justification for the RP, Project Description, Component and Activities)
- Socio-Economic Characteristics of the Project Zone.
- Results for PAPs census, socio-economic survey and asset inventory
- Project impacts and mitigation measures (including measures undertaken to avoid and/or minimize the impact of resettlement).
- Description of compensation and other resettlement assistance (including establishment of cut-off dates, eligibility criteria, entitlement matrix and proof of eligibility).
- Asset valuation (methods of valuations and results of asset inventory and valuation exercise).
- Stakeholder consultations.
- Implementation arrangements and schedule
- Grievance redress mechanisms- (Applicable legal/administrative procedures, judicial remedies, timeframes, and available grievance redress mechanisms (GRMs).

- Monitoring and Evaluation.
- Resettlement Program budget; and
- Annexes (including pictures, signed minutes of meetings, letters, asset registers, etc.)

- **Review and Approval of RPs by the World Bank and Other Relevant Institutions**

The World Bank will approve the RP document after reviewing the final draft copy and give no objection before the commencement of works. The Lands Commission will also approve the compensation report as per the Lands Act, 2020 (Act 1036), hence the Land Commission will also review the RP. For the purposes of obtaining an environmental permit for sub projects from Ghana EPA, the Authority may also request for RPs as part of their review of the sub project EIA or PER.

- **Formation of Sub Project Level (Local) Grievance Redress Committees (GRC)**

The Ministry of Education, Project Technical Team (PTT) shall ensure that a local resettlement implementation/grievance redress committee is constituted with membership drawn from various state and non-state actors including relevant NGOs or CBOs, local government functionaries, religious and traditional authorities in project zones as well as the PAPs. This Committee must have a female representation and representation for vulnerable groups such as PWDs.

- **Disclosure of RPs by Implementing Agency and World Bank**

The Ministry of Education, Project Technical Team (PTT) will disclose approved Resettlement Plans through the media (local FM stations) and public consultations in local language. Hard copies shall also be placed within the selected accessible points. The World Bank will disclose the RP at the World Bank's Website. Ministry of Education, Project Technical Team (PTT) will forward the budget/asset register to the Ministry of Finance for processing and payment.

- **Announcement of Compensation Payment Dates**

The Ministry of Education, Project Technical Team (PTT) will announce payment dates, venues and modalities using the District/Municipal/Metropolitan Assemblies and local media. PAPs with phone contacts will be called directly.

- **Negotiations with Dissatisfied PAPs**

PAPs who are dissatisfied with an offer/entitlement made by Ministry of Education, Project Technical Team (PTT) in the Asset Register (of the RP) are permitted to petition the GRC and/or engage the services of a private valuer and/or lawyer to enter a process of negotiation with the Ministry of Education, Project Technical Team (PTT) until they accept the offer.

- **PAP Acceptance of Offer**

When the two parties reach an agreement on the entitlement/compensation, the Ministry of Education, Project Technical Team (PTT) will then issue a letter based on the agreed terms for affirmation by the PAP.

- **Compensation of Project Affected Persons**

Once agreements are reached with the Project Affected Persons on compensation and other resettlement assistance, the Ministry of Education, Project Technical Team (PTT) will prepare the vouchers and cheques for the prospective claimants in the asset register. Claimants will have to show a valid identity card as proof before they are paid. For reinstatements, they will be completed before the vacation.

- **Vacation of Site by PAPs**

### ***Relocation of Temporary Structures***

Up to three (3) weeks after receipt of compensation, the MOE-PTT and project municipal/district officials will supervise PAPs with temporary structures to relocate the structures to designated new locations. As soon as the first group of PAPs vacate the site, civil works can commence.

### ***Partial or Full Demolition of Immovable Structures***

Depending on the severity of impact, owners of immovable structures will be given up to six (6) weeks to effect the demolition and relocation of their structures. In other words, adequate notice will be served to the affected persons concerning date of demolition, removal or destruction to afford affected persons the opportunity to conveniently move out and/or salvage any building material. This will be done after receiving compensation. The process will be supervised by officials from MoE-PTT and representatives of the project district/municipal authorities under the guidance of project engineers.

- **Preparation and Disclosure of RP Completion Report**

The resettlement implementation team at the end of the resettlement program will prepare a completion report. It will include a summary of the RP and implementation challenges as well as lessons learnt and any outstanding issues at the close of implementation of the RP. It will aid evaluation of the resettlement.

- **Completion Audit**

An independent Consultant will conduct a completion audit of the involuntary resettlement process, and the ensuing changes in the standards of living of PAPs are documented 6 months after the completion of the resettlement program. The audit report will compare actual outcomes with planned scenarios and a thorough ‘lessons learned’ section.

## E. Baseline Conditions and Anticipated Project Impacts

28. This section summarizes the relevant baseline socio-economic conditions of the project zone. It covers:

- **Location of the Project Zone**

Project activities will be implemented nationwide across all 16 regions of Ghana benefitting an estimated 2.3 million people during the implementation period. The program will reach all public secondary schools (SHS/STHS: 723, TVET: 233).

- **Population Structure of the People in the Project Zone**

Ghana's 2025 projected mid-year population of 33.74 millions is predominantly young, with children and youth making up over two-thirds of the national population. Approximately 38 percent of Ghanaians are under 15 years, and an additional 36 percent fall within the 15–35 age bracket, resulting in a high dependency ratio and a broad-based population pyramid. Only about 4 percent of the population is above 65 years. The sex structure is relatively balanced, though women slightly outnumber men nationally (51% versus 49%), with female-headed households more common in rural agricultural areas due to male labour migration.

Although urbanization is increasing, a significant share of the population (about 43 percent) remains rural, relying heavily on land-based livelihoods. These demographic characteristics mean that land acquisition or restrictions on land use may disproportionately affect households with high dependency ratios, women farmers, elderly persons, and other vulnerable groups. The youthful and rural nature of the population therefore has direct implications for livelihood restoration, compensation planning, and targeted support measures within the Resettlement Framework.

- **Ethnicity and Religion of the People in the Project Zone**

Ghana is ethnically diverse, with more than 70 ethnic groups grouped into several major blocs. The Akan constitute the largest ethnic category (about 47%), followed by the Mole-Dagbani (17%), Ewe (14%), Ga-Dangme (7%), and Guan, Gurma, Grusi, and Mande groups making up the remainder. Ethnic groups are distributed unevenly across the country, with rural livelihoods and land tenure systems strongly shaped by customary authorities and lineage structures. This diversity has practical implications for land governance, cultural practices, and dispute resolution during land acquisition or land-use restriction processes.

Religious composition is similarly varied but dominated by Christianity, which accounts for about 71% of the national population. Islam represents approximately 19%, while traditional religion and other beliefs constitute the remaining share. Religious institutions—churches, mosques, and traditional authorities—play important social roles, including community mobilization and conflict mediation. In the context of resettlement planning, the coexistence of ethnic and religious groups requires culturally sensitive engagement, respect for customary norms, and inclusive consultation approaches to ensure equitable participation and acceptance of project activities.

- **Cultural Heritage Site(s) in the Project Zone (if any)**

Ghana's cultural heritage is diverse and deeply rooted in traditional authority systems, with sites and assets ranging from sacred groves, shrines, royal mausoleums, and ancestral stools to community cemeteries, sacred rivers, and historic settlement sites. These heritage resources are typically owned and managed under customary law by stools/skins, clans, or family lineages, with

chiefs, queen mothers, and traditional priests exercising custodial authority. Many sites serve ongoing cultural, spiritual, and ceremonial functions, particularly for rites of passage, ancestral veneration, and seasonal festivals. Their locations are often embedded within farming landscapes, forest patches, riparian zones, and community centers, making them relevant to land-based development activities.

Complementing customary heritage assets, Ghana also maintains formally protected sites such as forts, castles, and historic monuments under the Ghana Museums and Monuments Board (GMMB). Management regimes therefore vary: customary sites follow indigenous governance norms, while state-protected sites are regulated through national legislation and require formal authorization for any activity that may affect them. In the context of land acquisition or land-use restrictions, these cultural heritage assets require early identification, culturally appropriate consultations with custodians, and adherence to chance-find procedures to prevent disturbance, ensure respect for local values, and maintain community support for project implementation.

- **Community Facilities in the Project Zone (if any)**

Community facilities in Ghana form the backbone of social service delivery and local governance, and are typically owned and managed either by the Metropolitan, Municipal and District Assemblies (MMDAs), traditional authorities, or community-based groups. Key facility types include basic and secondary schools, health centers and CHPS compounds, markets, water and sanitation systems (boreholes, standpipes, public toilets), community centers, town halls, sports fields, and religious buildings. These facilities provide essential services such as education, public health outreach, childcare, trading, civic meetings, and social cohesion activities.

Management arrangements vary across facility types: government-supported schools and health facilities are staffed and supervised by district education and health directorates, while markets, community centers, sanitation infrastructure, and some water systems are operated directly by MMDAs or through local management committees. Religious institutions independently manage churches and mosques, while traditional authorities oversee community lands and meeting spaces. Many rural communities also rely on volunteer committees for maintenance of boreholes and sanitation facilities. Because these facilities are central to daily life and local development, any project-induced access restrictions, temporary disruptions, or relocation of community facilities require early engagement with users and custodians, measures to maintain uninterrupted service delivery, and restoration or improvement of facilities in line with ESS5 requirements.

- **Land Tenure Regimes and Interest/Rights in Land in the Project Zone**

Ghana's land tenure system is pluralistic, combining customary, public, and private landholding arrangements governed under the *Land Act, 2020 (Act 1036)*. Approximately 80% of land is held under customary tenure, vested in stools, skins, clans, or families. Under customary tenure, allodial title—the highest land interest—is held by these traditional authorities, while individuals and groups access land through customary freehold, usufructuary rights, leasehold agreements, or tenancy arrangements (e.g. sharecropping - abunu and abusa). Customary land allocation is guided by communal norms and overseen by traditional leaders, with management support from customary land secretariats in many areas.

Public lands are those acquired by or vested in the state for public purposes, administered by the Lands Commission. These include lands acquired for infrastructure, security, public institutions, and utilities. Vested lands constitute an intermediate category in which the state manages

customary lands on behalf of the customary owners, sharing decision-making and revenue rights. Private lands include leaseholds and freehold interests legally acquired and registered by individuals, corporate bodies, or institutions.

The Land Act recognizes a hierarchy of land interests, including allodial title, freehold, leasehold, usufructuary rights, licenses, and easements. Each carries distinct rights and obligations regarding occupation, development, transfer, and compensation. Holders of lesser interests—such as tenants, sharecroppers, licensees, and good-faith occupants—are also recognized and afforded protection, particularly regarding disturbance compensation during compulsory acquisition or land use restrictions. In practice, Ghana’s land tenure landscape is characterized by overlapping claims, varying documentation levels, and strong customary governance systems. For resettlement planning, this requires careful stakeholder identification, verification of legitimate land rights (formal and customary), and transparent engagement with both statutory and customary authorities to ensure ESS5-compliant compensation, livelihood restoration, and protection of vulnerable rights holders.

Women, persons with disabilities (PWDs), and other vulnerable groups in Ghana are legally entitled to own, inherit, and transact land under the *Land Act, 2020 (Act 1036)*, which prohibits discrimination across all tenure systems. However, customary inheritance practices—shaped by matrilineal and patrilineal systems—continue to influence land access and succession in many communities. While statutory law guarantees spouses and children defined shares of a deceased person’s self-acquired property, customary norms often result in women gaining land through husbands or family heads rather than direct ownership, leaving their rights less secure in cases of divorce or widowhood. PWDs and other vulnerable persons typically hold use rights rather than registered titles, though Act 1036 and ESS5 require that their interests be formally recognized and fully compensated during land acquisition or land-use restrictions.

## 29. **Livelihood Activities:**

Ghana’s labour force is shaped by a diversified but largely informal economy. The informal sector accounts for approximately 80–85% of total employment, with most rural households engaged in agriculture. National employment data show that agriculture employs about 33–36% of the population, particularly in cocoa, food crop farming, livestock rearing, and fishing, while the services sector accounts for roughly 45–48%, dominated by trade, transport, hospitality, and public services. Industry provides the remaining 18–20%, including construction, small-scale manufacturing, and mining. Urban areas are characterized by strong participation in commerce and services, whereas rural livelihoods depend heavily on seasonal farming and natural-resource-based activities. Occupations frequently include petty trading, artisan work, food processing, and transport services.

Income levels remain modest and unevenly distributed. National living standards surveys indicate that poverty incidence is roughly 22%, but exceeds 40% in some rural districts, especially among smallholder farming households with limited market access. Rural incomes are highly seasonal and vulnerable to climate variability, while urban informal workers often depend on irregular daily earnings. Many households diversify livelihoods—combining farming with trading, artisanal work, or wage labour—to stabilize income. These demographic and economic patterns are essential for identifying potential livelihood impacts and designing compensation, transitional support, and livelihood restoration measures under the RF.

### 30. Anticipated Project Impacts and Mitigation:

Social risks are driven largely by the likelihood of land acquisition for school expansion or new school construction, which may lead to physical or economic displacement. In customary land areas, indeterminate boundaries, limited documentation, and unresolved legacy acquisition issues increase the potential for land disputes, grievances and delays. Construction in active school environments heightens community health and safety risks, particularly for children exposed to construction zones. Labor-related risks include inadequate contractor oversight, potential use of child labor, inconsistent OHS compliance, small-scale labor influx due to tight implementation schedules, and substandard worker accommodation.

The project's engagement with adolescents, including girls and learners with special needs, combined with contractor presence across multiple sites elevates the risk of GBV/SEA/SH, especially where safeguarding systems are weak. Expanded internet connectivity without adequate digital protection measures may also increase exposure to harmful online content and peer-to-peer harassment or exploitation. Implementation will involve multiple education agencies with varying levels of ESF capacity at national, regional and district levels, creating challenges for consistent supervision, contractor management, grievance resolution and stakeholder engagement. Overall, the project presents substantial but manageable environmental and social risks, requiring strong mitigation measures, enhanced institutional capacity, and clearly defined ESF instruments to ensure effective risk management throughout implementation.

Based on the social structure of the communities and the nature of the proposed project activities, the groups most likely to be affected include:

- Owners of farmlands
- Individuals experiencing loss of land use or land use rights
- Persons facing economic displacement
- Those losing economic and non-economic trees

This Resettlement Framework (RF) makes provisions to minimize such impacts and to address all potential situations, including cases involving physical displacement and livelihood restoration. Assistance will be provided in line with the Ghanaian legal framework and the requirements of Environmental and Social Standard (ESS) 5.

Special attention will be given to vulnerable individuals and groups, recognizing that they may require additional support such as relocation assistance, livelihood restoration measures, and timely delivery of compensation payments.

The significance of different types of social impacts is outlined in **Table 1**.

**Table 1: Potential Adverse Social Impacts on People Asset and Livelihoods/Community Resources and Infrastructure and Mitigation Measures**

No.	Impact	Description of Potential Impact/Issue	Social Significance	Mitigation Measures
1	Impact on farm lands	This will mostly involve loss of agricultural land for construction or expansion of school facilities.	Moderate	Prioritize use of government-owned or already acquired land; Apply minimum design standards to reduce land take; Avoid use of agricultural land as possible; If unavoidable prepare and implement

No.	Impact	Description of Potential Impact/Issue	Social Significance	Mitigation Measures
				RP/ LRP depending on the scope; Provide fair compensation for affected farmland in line with Ghana's Land Act, 2020 (Act 1036) and ESS 5.
2	Restriction/loss of land use or land use right	Construction of new school facilities and fence wall could restrict access to individual or communal resources	Moderate	Conduct participatory consultations to identify legitimate land owners/users; Provide compensation or alternative land access; Ensure transparent documentation of land acquisition; If not feasible, prepare and implement RP depending on the scope.
3	Economic and non-economic trees	Land clearing may lead to loss of economic trees and non-productive fruit and shade trees.	Moderate	Redesign site layouts to avoid tree removal where possible; Compensate for lost trees at replacement value; Support replanting programs within school compounds; Pay compensation for any economic trees.
4	Economic displacement of vendors and small businesses near school sites	Unused government lands could be occupied by "squatters" or vendors on school land whose livelihoods and small businesses can be impacted.	Moderate	Prepare and implement RP depending on the scope to guide relocation to alternative sites with similar potentials in consultation with PAPs; Adopt phased construction to minimize disruption; Provide livelihood restoration support (skills training, microfinance, relocation assistance); Establish grievance redress mechanism.
5	Temporary access disruptions	Temporary disruption of access routes during rehabilitation/upgrade works	Minor	Use alternative work methods (e.g., modular construction, phased rehabilitation); Provide temporary access routes and signage; Schedule works during off-peak school/community hours
6	Physical displacement	Potential physical displacement of households/structures and vendors operating on school land	Moderate	Avoid displacement through design alteration and compact site planning; Where unavoidable, provide relocation assistance and compensation; Ensure livelihood restoration measures for displaced households.
7	Social conflict	Disagreement on boundary demarcation and walling	Moderate	No involuntary resettlement should take place on disputed lands.

No.	Impact	Description of Potential Impact/Issue	Social Significance	Mitigation Measures
		could lead to potential conflict		Consider re-routing the boundary or wall.
8	Labor risk	Occupational health and safety issues for workers. Discrimination in employment and unfair treatment especially for vulnerable persons such as women, PWDs, child labor, labor unrest, GBV/SEA/SH etc.	Minor	Labor management risks assessed as part of ESHIA and labor management procedures (LMP) prepared as standalone or included in contractor ESMP for high and low risk respectively
9	Community Health and Safety	Potential Community Health and Safety risks of the project including sexual harassment, safety of children and teachers, diseases, improper waste disposal, noise, dust diseases etc.	Moderate	Mitigation measures included in contractor ESMP
10	Impacts on vulnerable groups	Vulnerable groups (women, elderly, low-income households) disproportionately impacted	Moderate	Identify vulnerable PAPs during baseline surveys; Provide tailored support (moving assistance, priority compensation, livelihood packages); Monitor delivery of benefits to ensure equity

## F. Eligibility for Benefits Under Resettlement Plans

31. To ensure fair and effective resettlement, the Ministry of Education, Project Technical Team (PTT) will establish clear eligibility criteria for receiving compensation and assistance. This section outlines the process for identifying eligible beneficiaries and the types of benefits they may receive based on the principles outlined below:

- i. Be guided by regulatory frameworks.
- ii. Aims at minimizing physical and economic displacement.
- iii. Has a cut-off date for compensation.
- iv. Aspires to restore income livelihoods.
- v. Considers resettlement as a development opportunity and benefits to affected communities
- vi. Ensure compensation paid prior to physical and economic displacement and at full replacement value;
- vii. Holds meaningful consultations with all stakeholders; and
- viii. Includes grievance mechanisms.

32. **Identifying Affected Persons and Assets.** During RP preparation, the Ministry of Education, Project Technical Team (PTT) will conduct a **census and asset survey**. This crucial step serves several purposes:

- **Identify all people affected** by land acquisition or restrictions on land use.
- **Inventory affected land and assets** (e.g., structures, crops, trees, businesses).
- **Determine eligibility** for various forms of compensation and assistance.
- **Prevent ineligible claims** (e.g., from opportunistic settlers) by establishing a clear baseline.

### 33. Establishing a Cut-off-date

A cut-off date will be established to determine eligibility for compensation and resettlement assistance under this Resettlement Framework (RF). The cut-off date is the date on which the census of Project-Affected Persons (PAPs) and the inventory of affected assets commences in a given project area. This date will be formally communicated to all stakeholders and communities to ensure transparency and prevent speculative occupation or opportunistic claims.

In accordance with World Bank ESS5, only persons, structures, economic activities, and assets that are verified during the census and asset enumeration as existing on or before the cut-off date will be considered eligible for compensation and assistance. Individuals or groups who encroach upon the project area after the cut-off date, or who construct or expand assets in anticipation of compensation, will **not be eligible** for any entitlements.

The cut-off date will be publicly disclosed through multiple channels including community meetings, traditional authorities, local government assemblies, information centres, public notices, and other accessible means. The MoE-PTT will maintain detailed documentation of the census process, including community attendance sheets, field records, photographic evidence, and official communication materials announcing the cut-off date.

Although the Land Act, 2020 (Act 1036) does not explicitly use the term “cut-off date,” the principle is consistent with legal requirements for asset inventory, valuation, and notification during compulsory acquisition or imposition of land use restrictions. The project will therefore apply ESS5 standards to ensure that the cut-off date is clearly established, fairly implemented, and consistently enforced across all project locations.

Any disputes regarding eligibility that arise after the cut-off date will be addressed through the project’s **Grievance Redress Mechanism (GRM)**, which will provide PAPs with an accessible and transparent channel for lodging and resolving grievances.

### 34. **Categorizing Affected Persons by Legal Status**

The census will categorize persons based on their legal status regarding the affected assets. This categorization directly influences the type and extent of benefits provided. As per ESS5 the following categories of PAPs are categorized as:

#### **Category A – Persons with Formal or Legal Rights to Land or other Assets**

These include individuals or legal entities holding **formal, legally recognized ownership rights** over the affected land or assets (e.g., titled landowners, registered businesses).

#### **Category B: Persons with Recognizable Legal Claims**

These are individuals or entities (e.g., communities) without formal legal title but whose **claims to land or assets are recognized or recognizable under the laws of Ghana, including customary tenure system**. This often includes:

- **Community/Clan/ Family Land Users:** Individuals and groups with allodial and usufruct rights to the parcel of land that will be impacted based on membership in a landowning traditional area, community, clan, or family, where land is held under customary tenure. These rights, though often unwritten, are recognized by applicable customary law and national laws.
- **Individual Customary Interest Holders/ Land Users:** Individuals or households, families and /or groups with secure and inheritable interests’ rights to specific plots for housing, farming or other recognized uses within the applicable customary tenure arrangements in each traditional area or community, even without formal titles. These interests or rights in land under customary law in Ghana include the usufructuary interest, customary freehold, and customary tenancies (i.e., *Abunu, Abusa* etc.,)
- **Bona Fide Occupants/Lawful Occupants:** These are individuals who have been living on and utilizing land for an extended period, often with the implicit or explicit consent of traditional authorities or the registered owner, even if they lack formal title.

#### **Category C: Persons with No Recognizable Legal Claim/Rights**

This category includes individuals or entities with **no recognized legal right or claim** to the land or assets they occupy or use (e.g., recent informal settlers or so-called squatters).

35. **Determining Compensation and Assistance:** Compensation and assistance will be determined by how land acquisition or restrictions on land use affect housing (including land), income, and livelihoods for each category, following the principle of **replacement cost**.

- **Minor Losses:**

- **Categories A and B:** If the loss of land or other assets is minor (i.e., does not affect more than 20% of land or asset and the rest of the asset is viable, and/or does not significantly affect income, livelihood, or housing), affected persons will receive **compensation at replacement cost** for the lost land and assets. This covers the asset's full replacement value and all associated transaction costs (e.g., registration fees, taxes) and the distribution of the benefits will take cognizance of the requirements of the Lands Act, 2020 (Act 1036).
  - **Category C:** Similarly impacted persons will receive **compensation at replacement cost for assets other than land** (e.g., crops, fencing, sheds, other improvements made to the land).
- **Loss of Housing (Physical Displacement):**
    - **Categories A and B:** Persons facing residential property loss and requiring relocation will be offered a choice:
      - **A replacement property** of equal or higher value, featuring secure tenure, comparable characteristics, and an advantageous location.
      - **Cash compensation equivalent to the replacement cost** of their lost residential property, if it is demonstrated the property replacement is not possible.
    - **Category C:** Persons displaced from their homes will receive **compensation at replacement cost for assets other than land**, including dwellings and other land improvements. They will also receive **relocation assistance** designed to help them restore their standards of living at an adequate alternative site.
  - **Significant Impact on Income or Livelihood (Significant Economic Displacement):**
    - **Categories A and B:** Persons who lose land or other assets that significantly impact their income, or livelihood will be offered a **replacement property of equal or greater value** (e.g., agricultural or commercial sites). If a suitable replacement property is not available or desired, **cash compensation at replacement cost** will be provided.
    - **Category C:** Persons facing similar impacts will receive:
      - **Replacement cost for lost assets other than land** (e.g., crops, irrigation improvements).
      - **Assistance to re-establish their livelihoods elsewhere** (e.g., skills training, job placement support, small grants, access to common property resources) instead of land compensation.

### 36. Special measures for Vulnerable and Disadvantaged Persons

The project will pay special attention to differentiated impacts on vulnerable groups or persons for whom special provisions will have to be made. In this context, vulnerable groups or persons are those at risk of becoming more vulnerable due to the displacement, compensation, and resettlement process. These may include but not limited to (i) the elderly, usually above 60 years (ii) Widows (iii) Children (iv) persons with disabilities (PWDs) (v) landless women (vi) Migrant farmers (without land title).

The project will identify vulnerable persons during census for the Resettlement Plan (RP) preparation when project scope and activities are properly identified and confirmed. Assistance will be provided based on their differentiated need. These may include:

- (i) Ensuring vulnerable persons are included in the consultations regarding the RF/RP and compensation and have their share of the compensation and assisted in finding alternative sites for farming and also have the option to incorporate them into activities of the Project;
- (ii) Paying compensation to them at their homes, assisting with land and asset registration, and providing additional monetary and non-monetary support tailored to their needs;
- (iii) Assistance in financial literacy training especially for women and assistance in compensation payment procedures (e.g., going to the bank with PAP to cash the compensation cheque);
- (iv) Assistance in the post payment period to secure the compensation money and reduce risks of misuse/robbery;
- (v) Assistance in moving: providing vehicle, driver and assistance at the moving stage; and
- (vi) Monitoring and continuation of assistance after resettlement and/or compensation, if required.

### **37. Livelihood Restoration Planning**

A Livelihood Restoration Plan (LRP) will be prepared, depending on the magnitude of impacts, to ensure that PAPs are provided with opportunities to improve or at least restore lost livelihoods, income earning capacity, and production levels.

### **38. Proof of Eligibility**

The following shall be used to establish eligibility for compensation and other forms of resettlement packages under the Project:

- i. *Affected persons with formal legal rights*, as documented in the form of land title registration certificates, leasehold indentures, tenancy agreements, rent receipts, building and planning permits, business operating licenses, utility bills among others. Unprocessed/unregistered formal legal documents will not bar eligibility and procedures for confirming the authenticity of such documents will be established in the RP, in accordance with the requirements of ESS 5, the laws of Ghana, including customary law/practices.
- ii. *Affected persons with no formally recognized legal rights*: criteria for establishing non-formal, undocumented or unrecognized claims to eligibility shall be established, paying particular attention to the peculiarities of each situation. Alternative means of proof of eligibility will include:
  - a. Affidavits signed by landlords and tenants; and
  - b. Witnessing or evidence by recognized traditional authorities.

Annex G presents the Entitlement Matrix for the project.

## **G. Methods of Valuing Affected Assets**

39. This section details the methods for valuing assets affected by subprojects or project components, ensuring compensation meets the ESS5 requirement of replacement cost.

40. **Compensation shall be based on Replacement Cost.** Replacement cost is a valuation method that provides sufficient compensation to replace affected assets and cover all necessary transaction costs associated with that replacement.

- **In Functioning Markets:** Replacement cost is the asset market value, as determined by professional real estate valuation, plus applicable transaction costs.
- **Where Functioning Markets Are Absent:** Replacement cost can be calculated through alternative methods. These may include determining the output value of land or productive assets, or assessing the undepreciated value of materials and labor required to rebuild structures or other fixed assets, with all transaction costs added.

41. **Substandard Housing:** If physical displacement results in the loss of substandard housing, the replacement cost must always be sufficient to allow for the purchase or construction of housing that meets minimum community standards for quality and safety (i.e., as if new).

42. **Consideration for Compensation and other Forms of Resettlement Assistance**

### **Achieving replacement cost compensation and resettlement assistance in Ghana.**

- **Livelihood Assistance/Loss of Income**

The estimation for loss of income (referred to as “livelihood assistance”) for affected businesses will be generally based on the following factors:

- Estimated production levels, income of business or daily sales of the business.
- Estimated period of construction or activity that will disrupt business or commercial activity (if impact is temporary).
- Loss of income for businesses will be estimated from net monthly/annual profit of the business, as verified by an assessment of visible stocks and activities or taxes receipts.
- Where impact on livelihood is permanent, losses will be estimated such as restoring PAPs to their pre-project production levels and income earning-capacity.
- Livelihood support must also include transitional allowance to cover the upkeep of PAPs who have lost their livelihood and are not making any significant earnings during the period of re-establishing themselves at a new business location.

- **Resettlement/Relocation Assistance**

Where PAPs are to be physically displaced or relocated, resettlement assistance should be provided to cover the costs of mobilizing (loading and offloading) and moving the affected properties and wares to a new location and/or accommodation assistance where affected persons must rent accommodation, business space (locations) or shops.

- **Transition Allowance**

Transitional support will be provided, as necessary, to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production

levels, and standards of living. Normally, a period of 3-6 months is considered as the transition period.

- **Disturbance Allowance**

Cost of disturbance is one of the components to be considered in determining compensation for PAPs (especially for affected structures, crops, and livelihoods). By convention in Ghana, disturbance allowance is estimated at 10% of the value of the affected property/compensation. However, this is subject to the approval of LVD of the Lands Commission. The method of valuation is summarized in Table 2.

**Table 2: General Guidelines and Methods for Valuing Lost Assets**

Item	Types	Method
<b>Land</b>	Community lands, private land	<ul style="list-style-type: none"> <li>• Prevailing market value of the land to be acquired, if there is a vibrant and active land market</li> <li>• Otherwise, a negotiated price for land replacement to be agreed</li> <li>• The value should include labor and other investment costs in the land</li> </ul>
<b>Structures</b>	Any type of structure (e.g., mud houses, wooden structures, sandcrete block houses, etc.)	<ul style="list-style-type: none"> <li>• Full Replacement Cost method.</li> <li>• No depreciation will be applied</li> <li>• Owner is free to keep any materials they can salvage</li> </ul>
<b>Crops/Plants</b>	Food and cash crops/economic plants	<ul style="list-style-type: none"> <li>• Most current LVD Crop Value rates or better</li> <li>• Crop rates will include labor and equipment invested in crop cultivation and number of years required for crops to reach maturity and generate income</li> </ul>
<b>Loss of income and Livelihood</b>	Businesses, livelihoods activities, e.g. farming, vendors etc.	<ul style="list-style-type: none"> <li>• Estimation of net monthly/annual profit for business/farm based on records; application of net monthly/annual profit to the period when business/farm is not operating</li> <li>• Where loss of income is temporal, the affected parties will be compensated in cash</li> <li>• When loss of livelihood is permanent, transitional allowance is estimated based on a reasonable estimate of the time required to restore their income-earning capacity, production, levels, and standards of living</li> </ul>
<b>Disturbance Allowance</b>	Business, crops, land and Structures	<ul style="list-style-type: none"> <li>• 10% of affected crop/property/land value</li> </ul>

### 43. Compensation Payment/Claim

Payments will be made through the Ghana Integrated Financial and Management Information System (GIFMIS) direct to the PAP's bank account. For PAPs without bank accounts and verifiable national ID, other forms of payments like the use of Ezwich, mobile money and secure cash payments via arrangements with local banks would also be explored. For couples, compensation may be paid through joint accounts when the relationship is confirmed. In cases where compensation will have to be paid in-kind, the Social Safeguards Specialist at the Ministry

of Education, Project Technical Team and the PAPs (including a Witness) shall confirm that such in-kind compensation has been received by the PAP.

PAPs will be given reasonable time to salvage any valuable items when vacating the site. The Ministry of Education, Project Technical Team will prepare a resettlement dossier and compensation payment form or receipt for each PAP in which all payments shall be documented. Compensation will be paid prior to PAPs vacating the site. The identities of PAPs will be verified either by their voter or the national identity cards (see Annex B: Framework for the Census of Affected Assets and Affected Persons, and Annex C: Compensation Claim and Commitment Form).

#### **44. Valuation Responsibility**

The Lands Valuation Division of the Lands Commission is responsible for asset valuation for government's compulsory acquisitions, validating compensations claims, payment of compensation, as well as the review of the resettlement plans pursuant to the Land Act, 2020 (Act 1036). While projects that involve compulsory acquisitions can engage Independent Professional Valuers for the compensation of valuations, their valuation reports must be validated and approved by the Lands Valuation Division of the Lands Commission.

## H. Organizational Arrangements for Land Acquisition and Resettlement

45. This section outlines the organizational arrangements for managing land acquisition and resettlement activities related to subprojects or project components. While this framework provides a general structure, specific, detailed arrangements will be further defined in individual Resettlement Plans (RPs), tailored to the scale and complexity of land acquisition and resettlement for each subproject or project component.

46. Effective land acquisition and resettlement require a well-defined, adequately resourced, and collaborative management structure. This structure must prioritize the rights and well-being of affected people, ensuring transparency, accountability, and the restoration or improvement of their living standards and livelihoods.

47. The Ministry of Education, Project Technical Team will ensure that robust organizational arrangements are in place for:

- **Stakeholder Engagement and Consultation:** Ongoing, meaningful dialogue with affected persons and communities.
- **Census and Socioeconomic Surveys:** Accurately identifying affected persons, households, and their assets.
- **Asset Valuation and Compensation:** Fair, transparent, and timely processes for valuing assets and delivering compensation.
- **Livelihood Restoration:** Designing and implementing programs to help economically displaced persons restore or improve their incomes and livelihoods.
- **Relocation and Site Development:** Planning and providing adequate housing, infrastructure, and access to services at resettlement sites if physical relocation is necessary.
- **Grievance Redress Mechanism (GRM):** Establishing accessible, transparent, and effective processes for resolving complaints and disputes.
- **Monitoring and Evaluation (M&E):** Systematically tracking progress, identifying issues, and ensuring desired resettlement outcomes.
- **Budgeting and Financial Management:** Ensuring adequate and timely allocation and disbursement of funds for all resettlement activities.
- **Capacity Building:** Providing necessary training and technical assistance to all staff involved in resettlement planning and implementation.

48. **Roles and Responsibilities of Key Actors.** Institutions such as the PVLMD and LVD of LC, EPA, District, Municipal and Metropolitan Assemblies, local community leaders and Affected Persons must be involved in the process of resettlement and land acquisition and their roles clearly spelled out. The following paragraphs identifies the key entities and their anticipated roles in the land acquisition and resettlement process:

**Overall Responsibility:** The Ministry of Education, Project Technical Team (comprising technical representatives of the MoE implementation agencies and key departments (including GES, CTNET, TVET Service, NaSIA, NaCCA, NTC, CENDLOS, and CEA)) will hold overall responsibility for effective planning, coordination, and implementation of RPs. Social and environmental safeguards technical officers/consultants will be procured/seconded to support the

MoE/PTT in carrying out its duties. The Social consultants and officers within the PTT will directly facilitate implementation of the RF.

The MoE will designate the M&E lead within its Planning, Budgeting, Monitoring and Evaluation Department (PBMED) to coordinate the MoE/PTT. The MoE/PTT will liaise with the Project Oversight Committee (POC) which will have members of the heads of agencies (including GES, NaSIA, NaCCA, NTC, CENDLOS, CEA, and NSS), MoF and the MoE, and will be chaired by the Minister/Chief Director of MoE.

With respect to this RF, the PTT's main functions include:

- (i) assume project control,
- (ii) coordinating with all relevant government agencies, local authorities, and other stakeholders involved in land acquisition and resettlement;
- (iii) allocating sufficient human, technical, and financial resources for all resettlement activities
- (iv) review reports submitted by the supervising consultants and bring up issues to the Project Oversight Committee (POC) for resolution;
- (v) liaise with the regional and district directorates to ensure their full participation in the supervision of the project;
- (vi) facilitate preparation of TORs for the RPs as needed;
- (vii) facilitate the preparation and disclosure of RPs in-country;
- (viii) ensuring timely disclosure of resettlement information to affected persons and other stakeholders
- (ix) ensuring that environmental and social management clauses are inserted into contracts and bidding documents during construction phase of subprojects;
- (x) coordinate training of regional and district actors, School Boards, and contractors to monitor safeguards implementation, compilation and preparation of safeguards report; and
- (xi) establishing and managing robust mechanisms for addressing grievances from affected persons and other stakeholders.

**49. Key actors in Compulsory Land Acquisition:** If land for a project activity or subproject or component is acquired through expropriation, the process will be handled as outlined in paragraph 16 of this RF.

**50. Key Actors in the Imposition of Land Restrictions:** If subprojects or project components are expected to restrict land use, the process will be handled as outlined in paragraph 19 of this RF.

**51. Other Key Actors and Their Roles:** For components of RPs that fall outside or supplement the compulsory land acquisition process or the process for restricting land use (e.g., relocation of informal settlers, livelihood restoration programs), the organizational arrangements are envisioned as follows:

**Table 3: Roles and Responsibilities in Implementation of RP**

<b>Stage of RP Implementation</b>	<b>Responsible Party(s)</b>
<b>Identification of project site</b>	Ministry of Education, Project Technical Team
<b>Screening for Physical and Economic Displacement</b>	Ministry of Education, Project Technical Team (specifically, the Social Specialist)
<b>Determine the need for RP</b>	Ministry of Education, Project Technical Team (specifically, the Social Specialist) – with concurrence from the World Bank
<b>Preparation of ToR for RP</b>	Ministry of Education, Project Technical Team (specifically, the Social Specialist)
<b>Approval of ToR for RP</b>	World Bank TTL on advise of the Social Specialist
<b>Procurement of Consultant for RP</b>	Ministry of Education, Project Technical Team
<b>Preparation of Draft RP</b>	Consultant
<b>Review of Draft RP</b>	Ministry of Education, Project Technical Team (specifically, the Social Specialist)
<b>Review of Final Draft RP and clearance</b>	World Bank Social Specialist
<b>Final RP disclosure</b>	Ministry of Education, Project Technical Team
<b>Payment of Compensation and other forms of Resettlement Assistance</b>	Ministry of Education, Project Technical Team
<b>Monitoring and Evaluation of RP implementation</b>	Ministry of Education, Project Technical Team (specifically, the M&E Specialist)
<b>RP Completion Audit</b>	Ministry of Education, Project Technical Team (through independent consultant)

### 52. Notification of Land Resource Holders

A formal search on the affected lands shall be conducted at the LC to establish the owners on record for subsequent engagement. Similarly, persons and entities occupying the affected lands shall be identified and located for subsequent engagement. All affected property owners or users shall be identified and located. The owner(s), user(s) or their representatives shall be informed through both formal notification in writing and by verbal notification delivered in the presence of other stakeholders or their representatives.

### 53. Documentation of Holdings and Assets

The MoE-PTT and LVD shall arrange meetings with affected individuals and/or households to discuss the affected assets inventory, assessment and compensation process. For each individual or household affected, MoE-PTT and LVD shall compile a compensation dossier containing necessary personal information on the affected party and those that s/he claims as household members, total land holdings, inventory of assets affected, and information for monitoring their future situation. This information shall be confirmed and witnessed by the school management and District/Municipal Assemblies. Dossiers will be kept current and will include documentation of lands surrendered. This is necessary because it is one way in which an individual can be monitored over time. All claims and assets will be documented in writing.

#### **54. Agreement on Compensation and Preparation of Contracts**

The aforementioned processes will be part of the Resettlement Plan preparation process and culminate in a comprehensive Resettlement Plan outlining all the losses, assessed compensation and other mitigation measures, processes and procedures for delivery of entitlements, and elaborate implementation arrangements.

The MoE-PTT shall prepare and distribute offer letters to all PAPs two (2) weeks after the RP is approved, stating the types and amounts of compensations being offered and the grace period or deadline to vacate from the premises. PAPs will be informed about the contents of the letters in a language that they understand. After receiving the offer letters, PAPs will have one (1) week to accept or reject the offer, make a counterclaim, and seek a remedy through the grievance processes. Those that accept will sign and submit acceptance letters (to be witnessed by third party CSO/NGO/traditional authority) to get their compensation. Those who refuse will be invited to negotiate with the MoE-PTT and will be allowed to make a counteroffer.

#### **55. Capacity Assessment and Capacity-Building Measures for Framework Implementation**

Implementation of the Resettlement Framework (RF) will rely on the capacities of the Ministry of Education (MoE), Ghana Education Service (GES), TVET Services, Environmental Protection Agency (EPA), Metropolitan/Municipal/District Assemblies (MMDAs), and school management bodies. Some of these institutions have long-standing experience implementing World Bank-financed operations, including the Secondary Education Improvement Project (SEIP) and GALOP, and possess established systems for financial management, procurement, and M&E. Since 2017, MoE has maintained a Safeguards Team comprising an Environmental Officer and a Social Officer seconded from EPA to support the GALOP project; however, these officers also carry responsibilities within their parent institution, limiting availability across the growing education portfolio.

A World Bank capacity review indicates the need to strengthen social, environmental, and gender staffing within the MoE Project Technical Team (MoE-PTT). In preparations for STARR-J, however, plans are underway to recruit one Social Specialist, one Env. Specialist and one GBV specialist. These 3 staff will cover both GALOP and STARR-J. The MoE-PTT Social Officer will facilitate day-to-day RF execution, with the safeguards team integrated into the project management structure and reporting to the Chief Director.

Capacity at the regional, district, and school levels requires targeted enhancement to ensure effective land acquisition management, stakeholder engagement, grievance handling, and compliance with ESS5 requirements. Training interventions will focus on clarifying institutional roles, strengthening understanding of the RF, and equipping local actors to identify, mitigate, and monitor social risks. Emphasis will be placed on collaborative problem-solving and community-based conflict resolution to minimize resettlement-related disputes.

#### **Regional and District-Level Training:**

Twice-yearly structured training workshops will be led by the national safeguards team for Regional Directorate of Education (RDE) staff, MMDA Environmental Officers/Engineers, school management representatives, and contractors. Sessions will address anticipated environmental and social issues during project implementation and provide orientation on World Bank ESF and ESS

requirements relevant to resettlement, including STARR-J guidelines and institutional responsibilities.

**National-Level Training:**

A national one-day training workshop will convene key project stakeholders to discuss policy-level issues, exchange implementation experiences, and harmonize approaches to RF application across agencies. The MoE-PTT safeguards officers will coordinate, deliver, and document all capacity-building activities.

## I. Arrangements for Funding Land Acquisition and Resettlement

56. The MoE will ensure that adequate funding is available to implement RPs to ensure that displaced persons are compensated and assisted to restore or improve their livelihoods and living standards. These arrangements are outlined below, based on the information that is currently available, and will be detailed in RPs.

57. **Preparation and review of Cost Estimates:** RPs will include itemized cost estimates for all resettlement activities. This includes:

- **Compensation costs:** For land, houses, structures, crops, trees, and other assets, calculated at full replacement cost. This means the amount needed to replace the asset with an equivalent asset, or to purchase it on the market, without depreciation or deduction for transaction costs.
- **Relocation costs:** Including moving allowances and transport.
- **Resettlement site preparation costs:** If new sites are provided, this covers land acquisition, infrastructure development (e.g., water, sanitation, roads), and public services (e.g., schools, health clinics).
- **Income restoration and improvement costs:** Measures to help displaced persons re-establish their livelihoods, such as training, credit, access to new land, or employment opportunities.
- **Administrative costs:** For planning, implementation, supervision, and monitoring of resettlement activities.
- **Consultation and participation costs:** For meaningful consultations with affected persons.
- **Grievance redress mechanisms:** Costs associated with establishing and operating mechanisms for addressing complaints.

58. **Review and approval:**

Resettlement plans under this project will undergo dual review and approval, first by the Land Valuation Division of Lands Commission, and then by the World Bank. Only after disclosure and compensation payment can project works proceed.

59. **Flow of funds:**

The Government of Ghana (GoG) will finance land acquisition and compensation through the Consolidated Fund; however, reliance on this mechanism frequently results in delays, as funds are not always available when required. To mitigate this risk, the Ministry of Education will establish an escrow account for all subprojects, ensuring that resources allocated for resettlement activities are ring-fenced and can be accessed promptly.

All site-specific Resettlement Plans (RPs) will include a detailed budget, clearly defined funding sources, and a time-bound schedule for compensation payments. Where necessary, GoG—through the Ministry of Finance and relevant agencies such as the Lands Commission—will provide supplementary financial and institutional support. This may include direct budgetary allocations to cover compensation obligations and infrastructure needs, as well as technical and administrative assistance from MMDAs to facilitate land acquisition, relocation, and community integration.

***In-Kind Contributions***

Certain aspects of the land acquisition and resettlement process may be supported through in-kind contributions from local authorities, beneficiary communities, and private entities.<sup>1</sup> These contributions will supplement financial resources and enhance the overall effectiveness of the land acquisition and resettlement strategy.

***Contingency Arrangement***

To address unforeseen resettlement-related costs, a contingency fund will be established and managed by the MoE in collaboration with MoF. This fund will ensure timely access to financial resources for:

- Addressing unexpected grievances or disputes related to land acquisition, compensation and resettlement.
- Unforeseen costs, inflation, and potential changes in the scope of displacement or assistance required.
- Supporting emergency measures in cases where resettlement conditions require urgent intervention.

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<sup>1</sup> Subject to World Bank voluntary land donation protocols

## J. Grievance Redress Mechanism (GRM)

60. The MoE-PTT will ensure that an accessible Grievance Redress Mechanism (GRM) is available to all persons displaced by subprojects or project components. The GRM will provide a transparent and effective means for displaced persons to voice their concerns, complaints, and grievances regarding the project's activities, especially those related to land acquisition, restrictions on land use, and involuntary resettlement. It will also ensure these issues are addressed and resolved in a timely and fair manner.

61. The GRM for each Resettlement Plan (RP) will be described in detail during the RP preparation, and its specifics may vary depending on the RP's complexity. However, at this stage, the MoE-PTT is committed to developing GRMs with the following essential features:

- **Multiple uptake channels:** Displaced persons can submit grievances through various means, including in-person at community/project offices, by mail, email, phone, SMS, suggestion boxes, and via trusted intermediaries.
- **Proximity:** Uptake locations will be established in areas where displaced people live.
- **Publicity and awareness:** Information about the GRM (purpose, process, and contact details) will be widely disseminated to all displaced persons in a timely manner and using culturally appropriate methods.
- **Clear procedures and timelines:** The GRM will have a well-defined process with clear steps and reasonable timeframes for receiving, processing, investigating, and resolving grievances.
- **Accountability:** Clear roles and responsibilities for GRM staff and committees will be established, along with a transparent reporting chain.
- **Feedback mechanism:** Complainants will be regularly informed about the progress of their grievance and the final decision/resolution.
- **Impartiality:** The GRM will operate independently of interested parties to avoid conflicts of interest or perceptions of bias.
- **Confidentiality and protection from retribution:** Grievances will be treated confidentially, and measures will protect complainants from any form of retaliation.
- **Inclusion of vulnerable groups:** Specific efforts will ensure that vulnerable and marginalized groups have equal access to and confidence in the GRM.
- **No cost to complainant:** There will be no formal or informal charge for submitting a grievance.
- **Prompt acknowledgment and response:** Grievances will be acknowledged promptly upon receipt, and efforts will be made to resolve them efficiently.
- **Problem-solving focus:** The GRM will be designed to facilitate solutions rather than just processing complaints.

62. RPs will describe in detail the **key operational components/steps** of the GRM, including:

- **Uptake (receiving grievances):** Methods for collecting grievances (e.g., hotlines, dedicated staff, complaint boxes, community meetings) and ensuring accessibility.
- **Sorting and processing:** Categorization of grievances (e.g., related to compensation, relocation, livelihood restoration); logging and assigning tracking numbers; prioritization of urgent or sensitive grievances; and initial assessment to determine admissibility.

- **Acknowledgement and follow-up:** Providing acknowledgment of receipt to the complainant; informing them about the process and expected timeline for resolution; and providing regular updates on the grievance status.
- **Verification, investigation, and action:** Fact-finding and investigation of grievances, engaging relevant project staff, community representatives, and other stakeholders; developing a proposed resolution or action plan; and escalating to higher levels or independent bodies if the grievance cannot be resolved initially or if the complainant is unsatisfied.
- **Monitoring and evaluation:** Tracking the number, type, and status of grievances received; monitoring resolution rates and timeliness; analyzing grievance data to identify trends, recurring issues, and systemic problems; and using this data to inform project management and make necessary adjustments to prevent similar grievances in the future.
- **Providing feedback and closure:** Communicating the final resolution or actions taken to the complainant; ensuring the complainant is satisfied with the outcome, if possible; and documenting the closure of the grievance.

63. RPs will also describe the **institutional arrangements** made to ensure the GRM functions effectively, including:

- **Dedicated personnel:** Clearly defined responsibilities for GRM management and operation.
- **Training and capacity building:** Training provided to GRM staff on grievance handling, communication, conflict resolution, and other relevant skills.
- **Coordination with external mechanisms:** Integration of the GRM with existing dispute resolution mechanisms at the local or national level.
- **Record keeping and information management:** Steps taken to maintain an effective system for recording, tracking, and managing grievance data.

## **K. Stakeholders Engagement / Consultations During Resettlement Planning and Implementation**

64. **Meaningful consultation framework:** Meaningful consultations with all persons affected by physical and/or economic displacement will be fundamental components of the preparation and implementation of RPs. The MoE-PTT views these consultations as a crucial tool for ensuring that project design and implementation effectively address the specific needs and concerns of displaced persons, thereby contributing to satisfactory resettlement outcomes. The Constitution of the Republic of Ghana, Lands Act 2020 (Act 1036), Environmental Protection Act, 2025 (Act 1124) and the Environmental Protection (Environmental Assessment) Regulations, 2025 (L.I. 2504) prescribe stakeholder engagement and consultation as integral parts of project design, implementation, monitoring and evaluation. The application of these laws in conjunction with World Bank ESS5 and ESS10 - which require that meaningful consultation and disclosure take place throughout the project cycle, will guide the planning and execution of the resettlement program. Stakeholder engagement and consultations under the RF and subsequent RPs aligns with the project Stakeholder Engagement Plan (SEP).

65. **Consultations prior to RP finalization:** Prior to the finalization of RPs, the MoE-PTT will carry out comprehensive consultations to ensure the RP accurately reflects the specific needs and preferences of affected persons and incorporates their informed choices. Each RP must include a clear summary of the following aspects of the consultation process:

- a. Views and concerns expressed by displaced persons and a clear explanation of how these views were systematically considered and integrated into the RP.
- b. Options offered to displaced persons (e.g., forms of compensation for lost assets, alternative relocation sites) and documentation of their chosen preferences.
- c. Arrangements made to enable displaced people to communicate their concerns to project authorities.
- d. Measures taken to ensure the adequate representation and inclusion of vulnerable groups (e.g., Indigenous Peoples, ethnic minorities, the landless, women, persons with disabilities, elderly, youth, and female-headed households) throughout the consultation process.

66. **Documentation of Consultations:** All consultation activities will be thoroughly documented in RPs. This documentation will include information on all meetings held with displaced persons, detailing: dates, locations, participant numbers, a summary of comments made, questions asked, concerns expressed by displaced persons, and the official responses provided. This level of detail will ensure transparency and accountability. Pictures and signed minutes of consultations must be attached in the Annexes of the RP.

A summary of the consultations undertaken during the project preparation phase can be tabulated as shown below.

**Table 4: Previous Consultation Matrix**

Date of Consultation	Name of Organization/ Group	Number of Consultees			Summary of Issues Discussed	Summary of Conclusions Reached	Next Steps/Areas of Further Discussions
		Males	Females	Total			
Feb, 10, 2026	Government project preparation team	14	8	22	Project objective, scope, implementation arrangement, E&S risks and impacts, costing and budgeting, etc.	Agreement to continue further engagement on project design	Further engagement proposed
Feb. 11, 2026	Government project preparation team	18	9	27	Project objective, scope, implementation arrangement, E&S risks and impacts, costing and budgeting, etc.	Agreement to continue further engagement on project design	Further engagement proposed
Feb. 12, 2026	<ul style="list-style-type: none"> <li>• MoE</li> <li>• GES</li> <li>• NaCCA</li> <li>• NaSIA</li> <li>• NTC</li> <li>• CTVET</li> <li>• TVET Service</li> <li>• GhLA</li> <li>• FPMU</li> </ul>	43	16	59	Project objective, scope of activities, implementation arrangements, required E&S instruments, criteria for selection of schools, etc.	Agreement on PDO and scope of activities	Further engagements to agree on results framework and indicators
	T-TEL, EU, UNESCO, GIZ, UNICEF, Solidaridad, World University Service				Project objective, scope, implementation arrangement, costing and budgeting, etc.		

	of Canada (WUSC), MasterCard Foundation, British Council and JICA						
Feb. 13, 2026	<ul style="list-style-type: none"> <li>Ghana Federation of Disability Organizations</li> </ul>	31	12	43	Project objective, scope of activities, implementation arrangement, E&S risks and impacts, Disability inclusion and accessibility for new infrastructure	Infrastructure designs to be subjected to disability and safety audits before approval	Further engagements when selection of beneficial schools completed
Feb. 17 – 21, 2026	<ul style="list-style-type: none"> <li>MoE</li> <li>GES</li> <li>NaCCA</li> <li>NaSIA</li> <li>NTC</li> <li>CTVET</li> <li>TVET Service</li> <li>GhLA</li> <li>FPMU</li> </ul>				PDO, indicators, scope of activities, schedule for field stakeholder engagements, E&S instruments and project appraisal		

#### **67. Stakeholder Engagement/Consultation Strategy for Resettlement Framework and Plan Preparation and Implementation**

The main goal of the stakeholder consultations under RF/RP preparation and implementation is to ensure inclusivity in the decision-making process at every stage of the project, create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner. This will also provide sufficient opportunity for the various stakeholder groups to voice their opinions and concerns to influence project decisions during the project design, implementation, and closure stages.

At each stage of the RP preparation and implementation process, the MoE-PTT will ensure meaningful engagement, consultation, and disclosure of project information to all relevant stakeholders in line with the requirements of ESS 10 and national laws (see Table 5 for details). Disclosure and consultation activities will be designed in accordance with the following key guiding principles:

- Consultations must be widely publicised, particularly among project affected stakeholders/communities, preferably two (2) weeks prior to any public engagements.
- Non-technical information summary must be accessible prior to any event, to ensure that people are informed of the assessment and conclusions in advance.
- The location and timing of meetings must be determined to maximise stakeholder participation and availability.
- The information presented must be clear, non-technical, and presented in all appropriate local languages where necessary.
- Engagements must be facilitated in ways that allow stakeholders to raise their views and concerns without constraints or fear of reprisals; and
- Issues raised must be addressed at the meetings themselves or later.

**Table 5: Stakeholder Engagement Strategy for Resettlement Activities**

<b>Key Activities</b>	<b>Target Stakeholders</b>	<b>Expected discussions/ decisions</b>	<b>Mode of Engagement/ Consultation</b>	<b>Responsible Party</b>
<b>Preparation of RF/ project design and planning</b>	Ministry of Education (MoE), GES, TVET Services, RCCs, RDEs, MMDAs, School Boards/PTAs, Traditional Authorities, Landowners, EPA, CSOs, World Bank	<ul style="list-style-type: none"> <li>• Project objectives and scope</li> <li>• Potential land acquisition risks</li> <li>• Roles and responsibilities</li> <li>• Resettlement principles and eligibility</li> <li>• Alignment with ESS5 and national laws</li> <li>• Initial stakeholder inputs to inform RF</li> <li>• Stakeholder workshops</li> <li>• Key informant interviews</li> <li>• Virtual and physical consultations</li> <li>• Review and comment periods</li> </ul>	<ul style="list-style-type: none"> <li>• Technical meetings</li> </ul>	MoE-PTT (Social & Environmental Safeguards Team); GES/TVET; World Bank support
<b>Screening process</b>	MMDA Planning and Works Departments, School Management, Traditional Authorities, Landowners, PAPs, Survey/Valuation Officers	<ul style="list-style-type: none"> <li>• Identification of project impacts</li> <li>• Confirmation of land ownership and boundaries</li> <li>• Identification of affected persons/assets</li> <li>• Determination of need for RAP/ARAP</li> <li>• Agreement on cut-off date</li> <li>• Community entry meetings</li> <li>• Focus group discussions</li> <li>• Asset inventory consultations               <ul style="list-style-type: none"> <li>• Screening forms and documentation</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Site inspections</li> </ul>	MoE-PTT, MMDA E&S Focal Persons, School Management, Lands Commission
<b>Resettlement and compensation planning</b>	PAPs (landowners, tenants, farmers, encroachers), Traditional Authorities, Women's Groups, PWD groups, School Management, MMDA Authorities, Land	<ul style="list-style-type: none"> <li>• Confirmation of PAP eligibility</li> <li>• Valuation methodology and compensation options</li> <li>• Livelihood restoration measures</li> <li>• Preferences for compensation (cash/in-kind)</li> <li>• Grievance redress arrangements</li> </ul>	<ul style="list-style-type: none"> <li>• Household/individual consultations</li> <li>• Focus group discussions (women, PWDs, youth)</li> <li>• Valuation consultations</li> <li>• Community meetings</li> </ul>	MoE-PTT Safeguards Team, Valuation Experts, MMDA Social Officers, School Management

	Valuation Division, Survey Department	<ul style="list-style-type: none"> <li>• Draft RAP/ARAP content</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of draft findings</li> </ul>	
<b>Implementation of RP</b>	PAPs, MMDA Staff, Payment/Finance Units, Traditional Authorities, Contractors, School Management, Security Agencies (if needed)	<ul style="list-style-type: none"> <li>• Final agreements on compensation</li> <li>• Verification and sign-off of affected assets</li> <li>• Payment procedures and timelines</li> <li>• Livelihood restoration plan rollout</li> <li>• Transition/relocation assistance</li> <li>• Monitoring of PAP satisfaction <ul style="list-style-type: none"> <li>• Witnessed payments</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Compensation meetings and sign-offs</li> <li>• GRM interactions</li> <li>• Livelihood support workshops <ul style="list-style-type: none"> <li>• Field monitoring visits</li> </ul> </li> </ul>	MoE-PTT, MMDA Finance & Works Units, Land Valuation Division, Contractors (for site access), Traditional Authorities
<b>Disclosure of RP</b>	PAPs and communities, MMDA Offices, School Boards/PTAs, Traditional Authorities, CSOs, World Bank	<ul style="list-style-type: none"> <li>• Final entitlements for PAPs</li> <li>• Implementation schedule</li> <li>• Rights and responsibilities of PAPs</li> <li>• GRM mechanisms and contact points <ul style="list-style-type: none"> <li>• Opportunities for appeals and corrections</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Public meetings and community fora</li> <li>• Website and noticeboard posting</li> <li>• Distribution of information leaflets</li> <li>• Disclosure at MMDA offices and schools <ul style="list-style-type: none"> <li>• World Bank external website (as required)</li> </ul> </li> </ul>	MoE-PTT Safeguards Team, MMDA, GES/TVET, World Bank (for official disclosure)

68. **Disclosure of draft RP:** Following review and acceptance by the World Bank, the MoE-PTT will disclose the draft Resettlement Plan to all displaced persons and the wider public. Opportunities for displaced persons to provide comments and feedback on the proposed plan will be actively solicited and documented.

69. **Principles of effective disclosure:** All critical information contained within RPs will be disclosed in a timely, accessible, and culturally appropriate manner. To this end, the MoE-PTT will:

- Utilize relevant local languages, understandable formats, and accessible locations conducive to participation.
- Consider the characteristics of the persons being consulted and address information needs related to disability, literacy levels, gender, mobility limitations, and linguistic or accessibility differences.

70. **Disclosure of final RP:** The final Resettlement Plan will be officially disclosed following full consideration of all received comments and subsequent acceptance by the World Bank.

71. **Consultations during the implementation of RPs.** Consultations remain vital during implementation to ensure that the resettlement process is responsive to evolving needs and challenges. For this reason, the MoE-PTT is committed to maintain regular and continuous communication with displaced persons and host communities to monitor progress, address emerging issues, and gather feedback on the effectiveness of implemented measures.

72. **Consultations during RP implementation:** Ongoing consultations are vital throughout the implementation of RPs to ensure the resettlement process remains responsive to evolving needs and challenges. To this end, the MoE-PTT is committed to maintaining regular and continuous communication with displaced persons and host communities. This commitment extends to:

- Relocation and income restoration programs will be implemented in a flexible and adaptive manner to allow for adjustments based on the feedback received during ongoing consultations.
- Monitoring and evaluation activities will be carried out with the participation of displaced persons or their representatives to ensure transparency and accountability.
- Conduct monitoring and evaluation activities with the active participation of displaced persons or their legitimate representatives to ensure full transparency and accountability.

## L. Monitoring and Evaluation of the Implementation of Resettlement Plans

73. The MoE-PTT will ensure that RPs include robust M&E programs to systematically track the progress in their implementation and to determine if their objectives have been achieved. M&E programs will also identify areas where improvements and adjustments are needed and provide project managers and other stakeholders with continuous feedback on implementation to facilitate adaptive management.

74. **M&E benchmarks and baseline data.** The MoE-PTT recognizes that a prerequisite of an adequate M&E program is the availability of complete information on the baseline conditions of displaced persons. For this reason, the MoE-PTT will ensure that this information is collected during the preparation of RPs through comprehensive socioeconomic surveys of all project-affected persons and households before displacement. Complete baseline data collection is critical for establishing a benchmark against which to measure project impacts and the effectiveness of resettlement interventions.

75. M&E programs included in RPs will include the following components:

- **Monitoring indicators:** Indicators to track progress and outcomes, covering:
  - *Inputs:* Resources provided (e.g., funds disbursed for compensation, number of houses built, training provided, etc.)
  - *Outputs:* Direct results of interventions (e.g., number of persons compensated, relocated, or receiving rehabilitation assistance, land handover completed)
  - *Outcomes:* Changes in the well-being and living standards of displaced persons (e.g., restoration/improvement of income levels, living standards, housing quality, access to services, restoration of social networks).
- **Implementation monitoring:** Systematic tracking of activities and processes:
  - *Compensation tracking:* Verification of compensation rates against replacement cost principles, timeliness of compensation payments (cash or in-kind), and addressing any discrepancies or grievances related to compensation.
  - *Relocation monitoring* (if applicable): Monitoring the relocation process, assessing the adequacy and quality of new housing and infrastructure at resettlement sites, and evaluating access to essential services (e.g., water, sanitation, electricity, transportation, education, healthcare).
  - *Income and livelihood restoration monitoring* (if applicable): Tracking the implementation of economic rehabilitation programs (e.g., provision of agricultural inputs, vocational training, access to credit, job placement, business development support) and their initial uptake.
  - *Consultation and Participation:* Monitoring ongoing consultations with affected persons to ensure their feedback is effectively incorporated into implementation and that their concerns are addressed.
  - *Grievance Redress Mechanism (GRM):* Monitoring the functioning of the GRM, including its accessibility, timely registration, and effective resolution of grievances.
  - *Budget Tracking:* Monitoring the financial resources allocated and disbursed for compensation, relocation, and rehabilitation activities against approved budgets.

- *Compliance with RP*: Regular checks to ensure all activities are carried out in accordance with the approved RP, relevant national laws, and World Bank environmental and social standards.
- **Outcome evaluation**: Periodic assessment of resettlement program effectiveness:
  - *Post-relocation assessment (if applicable)*: Periodic socioeconomic surveys (e.g., 6, 12, 18 months post-relocation) to assess the effectiveness of the relocation program in achieving its objectives. This involves comparing current socioeconomic conditions of relocated households or businesses with baseline data.
  - *Livelihood restoration assessment (if applicable)*: Evaluation of whether the displaced households have been able to restore and preferably improve their income-generating activities and living standards to pre-displacement levels or better, as defined by the RP objectives.

76. **Independent monitoring and evaluation.** In the case of RPs involving complex compensation, relocation or economic rehabilitation programs, the MoE-PTT will appoint an independent party with the necessary expertise to conduct periodic reviews and evaluations of the progress towards attaining the objectives of the RPs, and to provide advice on any necessary corrective actions. The scope, methodology, and reporting frequency of such independent M&E will be clearly defined in the RP.

77. **M&E Institutional arrangements and reporting.**

The MoE-PTT shall oversee general monitoring of the RF/RPs by means of both internal and external checks to ensure optimum performance. The internal performance-monitoring milestones will afford a MoE-PTT chance to judge physical progress against indicators and report on these indicators as part of the monthly /quarterly progress reports to the World Bank and other relevant stakeholders. The reports will capture records of RPs/RF activities. Independent External Consultants shall be procured to facilitate the monitoring process.

The MoE-PTT will make all necessary arrangements for monitoring the implementation of RPs and evaluating their results. To this end, the MoE-PTT will:

- Clearly delineate the roles and responsibilities for M&E within the MoE-PTT and other relevant stakeholders, including the establishment of a dedicated M&E unit or focal point if deemed necessary.
- Ensure that the MoE-PTT has the necessary technical and human resources for effective M&E or that it has access to external expertise to carry out this task, including training and capacity building where required.
- Facilitate the meaningful participation of displaced persons or their representatives in monitoring and evaluation activities, including data collection and validation.
- Provide periodic monitoring reports to the World Bank regarding the status of land acquisition, relocation, and livelihood restoration programs. Reports should be transparent, data-driven, and highlight both achievements and challenges, along with proposed corrective actions and timelines.

**Table 6: Monitoring Roles for RP Implementation**

<b>Actors</b>	<b>Role</b>
<b>MoE-PTT</b>	Lead agency and coordinating institution for monitoring the implementation of RPs under the project Regular monitoring of PIU RP implementation and its impacts
<b>Lands Commission</b>	Monitoring to ensure the approved assessed compensation is paid Periodic monitoring of RP implementation and its impacts
<b>External Consultant(s)</b>	Periodic monitoring, evaluation, and auditing of RP implementation

## M. Resettlement Framework Budget

### Budget for Implementation of Resettlement Framework

It is estimated that a total amount of *one million one hundred thousand US Dollars (\$1,100,000)* will be required to implement activities identified in the Resettlement Framework (see Table 7 for details). A template for budget preparation for Resettlement Plan Preparation and Implementation is presented in Annex E.

**Table 7: Estimated Budget for RF Implementation**

<b>Activity</b>	<b>Description</b>	<b>Item</b>	<b>Total Cost (Indicative) US\$</b>
<b>Screening</b>	Screening of sub-project sites and preparation of Screening Report and Terms of Reference for Resettlement Plan	Local travel, allowances, community engagements, stakeholder meetings etc.	No Separate Cost ( <i>Included in Environmental and Social Screening in the ESMF</i> )
<b>Cost of Preparing/ maintaining GRM</b>	Setting up of the GRM framework, developing tools and outlining roles and responsibilities of implementing entities		No Separate Cost ( <i>Included in sector-wide GRM in Stakeholder Engagement Plan</i> )
<b>Cost of sensitization and Implementing the GRM</b>	To popularize the GRM among PAPs and public, receive and register complaints, investigate and redress complaints, etc.	Local travel, allowances, community engagements, stakeholder meetings, IEC materials, data capture and storage, reporting, etc.	No Separate Cost ( <i>Included in sector-wide GRM in Stakeholder Engagement Plan</i> )
<b>Capacity Building</b>	Training of PTT staff, relevant project stakeholders on land acquisition and resettlement implementation and GRM	Cost of organizing training at various locations across the country	300,000
<b>RF/RP Disclosures</b>	Production of documents for distribution, disclosure in at least two widely circulated national newspapers, discussion with PAPs and	Printing, newspaper publication, local travel, media engagement, etc.	50,000

	other stakeholder engagements to share information		
<b>Preparation of RPs</b>	Field work, Stakeholder Engagement and Preparation of RP	Consultancy Fees (including professional fees and reimbursable costs)	500,000
<b>Monitoring and Evaluation</b>	To engage a local consultant who will be responsible for external monitoring and evaluation of the implementation of the ESS5 provisions during RP Implementation	Consultant's fees and Monitoring	250,000
<b>Total Cost</b>	-	-	<b>1,100,000</b>

## Annexes

### Annex A: Screening Checklist for Involuntary Resettlement

<b>A PROJECT NAME</b>				
1.	Project Location (Province, District, Town)			
2.	Safeguard officer filling Form			
3.	Date of Screening			
<b>B DESCRIPTION OF ACTIVITY</b>				
1.	Type of Activity (including objectives and outputs)			
2.	Land area to be taken by project activity, in hectares (include location coordinates)			
3.	Any existing property to be affected, and by how much (total, partial demolition etc.)			
4.	Any plans for construction, movement of earth, changes in land cover			
5.	Date of commencement and expected completion date and estimated cost			
<b>C PRELIMINARY ENVIRONMENTAL INFORMATION</b>				
		YES	NO	COMMENT
1.	Is there adjacent/nearby critical natural habitat?			
2.	Are there activities at the project site?			
3.	What is the current land use			
4.	Will the proposed activities have any impact on any ecosystem services, biodiversity issues or natural habitats?			
5.	Will there be restrictions or loss of access to community facilities or resources?			
6.	Will there be restrictions or loss of access to community facilities or resources?			
<b>D PRELIMINARY SOCIAL INFORMATION</b>				
		YES	NO	COMMENT
1.	Has there been litigation or complaints of any environmental nature directed against the proponent or subproject?			
2.	Will the subproject require the acquisition of land?			
3.	What is the status of the land holding required by the project (customary, lease, community lands, etc.)?			
4.	Is there evidence of land tenure status of landowners and/or occupants (affidavit, other documentation)?			
5.	Are there outstanding land disputes?			
6.	Has there been proper consultation with stakeholders?			
7.	Is there a grievance process identified for PAPs and is this easily accessible to these groups/individuals?			
8.	Will there be any changes to livelihoods?			

9.	What are the main issues associated with community benefits?			
10.	Will any restoration or compensation be required with Affected persons			
<b>E</b>	<b>IMPACT IDENTIFICATION AND CLASSIFICATION</b>			
		<b>Choose L, M or H</b>	<b>COMMENT</b>	
1.	Livelihood	LOW (No livelihoods affected, short project duration and persons may revert to business activities immediately)		
		MEDIUM (Livelihoods affected, and persons may require some minimal assistance)		
		HIGH (Livelihoods affected, and compensation payments required)		
2.	Land tenure	LOW (No conflicts, disagreements around use of land)		
		MEDIUM (Process of land regularization and rights to natural resources being worked out with clear communication and grievance process in place)		
		HIGH (Land conflicts historically unresolved, community/ persons being evicted, settlers losing rights and no transparency or grievance redress available)		
<b>F</b>	<b>SUMMARY OF SITE SENSITIVITY</b>			
		<b>Tick appropriately</b>	<b>Comments</b>	
	[A]	HIGH		
	[B]	MEDIUM		
	[C]	LOW		
<b>G</b>	<b>IMPACT MITIGATION</b>			
	Impact identified			
	Mitigation options			
<b>H</b>	<b>DETERMINATION OF ENVIRONMENTAL CATEGORY BASED ON SCREENING</b>			
			<b>Tick appropriately</b>	<b>COMMENT</b>
	[A]	REQUIRES RP		

	[B]	REQUIRES PREPARATION OF ADDITIONAL E&S INFORMATION TO SUPPORT RPF		
	[C]	DOES NOT REQUIRE FURTHER ENVIRONMENTAL AND SOCIAL DUE DILIGENCE – REFER TO RPF		
	PREPARED BY:	.....		
	DATE:	.....		

**Annex B: Framework for the Census of Affected Assets and Affected People**

**A. AFFECTED PLOT OR LANDFORM**

Reference/GPS Coordinates:

Location: Region: District Community/ Village:

Surface: Description of soil:

Crops:

Perennial Crops	1	Owner:
	2	Owner:
Annual Crops:	1	Owner:
	2	Owner:
Trees	1	Owner:
	2	Owner:

Structures: Owner  
 Channels: Owner:  
 Anti-erosive structures: Owner:  
 Buildings: Owner:

Users:

User 1: Surface used: Regime of tenure:  
 User 2: Surface used: Regime of tenure:  
 User 3: Surface used: Regime of tenure:  
 User 4: Surface used: Regime of tenure:

Valuation proposal (details of calculation on attached sheet):

Crops:

Structures:

Proposed distribution of compensation:

User 1:  
 User 2:  
 User 3:  
 User 4:

Date: Prepared By:

**B. AFFECTED BUILDING FORM**

Reference/ GPS Coordinates/Photograph number

Location: Region. District. Community/Village

Owner: Address:

Description:

Permanent Non-permanent

Surface: Number of rooms:

Walls: Material Condition

Roof: Material Condition

Floor:                      Material                      Condition  
Annexes outside:        Latrine:                      Bathroom:        Kitchen:  
Others: Additional features:

Permanently Inhabited:        By: Regime of occupation:  
Periodically Inhabited:        By: Regime of occupation:

Valuation proposal (details of calculation on attached sheet):

Proposed distribution of compensation:

User 1:

User 2:

User 3:

User 4:

Date:    Prepared By:

### **C. AFFECTED HOUSEHOLD FORM**

Household Reference:

Location:        Region:        District:        Village:

Photograph numbers for each household member

Reference of Affected Asset:

Type:    Structure        Plot    Crop

Reference of Affected Asset Sheet:

Location:        Zone:        Region:

Household Information:

Head of Household:    Name:    Age:    Sex:

Identity Document: Type: Number:

Composition of Household:

Socio-Economic Information:

Occupations:

Head of Household:

Other members of Household:

Number: Occupation:

Number: Occupation:

Total Estimated Household Cash Income:

Education level of Household Members:

Project Impact:

Assessment of the Impact of the Loss of the Affected Asset on Household's Livelihood:

Proposed Compensation or Resettlement Package

Household's Wishes

Proposed Package

Proposed Livelihood Restoration or Assistance Package:  
Household's Wishes  
Proposed Package

Date: Prepared By:

**Annex C: Compensation Claim and Commitment Form**

**COMPENSATION CLAIM & COMMITMENT FORM**

**Affected Person Information:**

Name of Claimant: ..... Sex: ..... Age: ..... years  
 Name of Representative/Contact Person: .....  
 Region: ..... Town: ..... Community/Suburb: .....  
 Affected property: .....

Affected Land (GHC)	Affected property Structure (GHC)	Disturbance/Transition Allowance (GHC)	Livelihood assistance (GHC)	Other supplementary assistance as necessary (GHC)	Total compensation (GHC)

**Total Compensation Due: ..... GHC**

**Compensation Payment Commitment:**

I, ....., having received the above total compensation amount for the land required/structures/crop(s) at the project site in question on .....(i.e. date of compensation payment), have agreed in principle to vacate or release the said land(s), for which compensation has been paid for the crops/structures/land thereon, on .....(agreed date when PAP should vacate or release the land).

Signature or Thumb print of claimant /recipient: .....Date: .....

Name of Administrator (Project Representative):  
 .....

Signature of Administrator: ..... Date:.....

Contact of Administrator: .....

Name of Witness: ..... Signature/Thumb print of Witness .....

Contact of Witness: .....

**Annex D: Model Complaint Registration and Resolution Form**

**A. Details of Complainant**

Name of Complainant): .....  
Type of Identity card .....  
ID Number (PAPs ID number if any): .....  
Contact Information (House number/mobile phone): .....

**B. Details of Grievance:**

.....  
.....  
.....  
.....  
.....  
.....

**C. Type of Grievance**

Type of Grievance .....

Anonymous Yes [ ] No [ ]

**Receiver Information**

Name of Receiver: ..... Signature/Thumb print: .....

Designation:..... Date: .....

Name of Filer (if different from Compliant): ..... Signature.....

Date: .....

Relationship to Complainant (if different from Complainant):

.....

**D. Review/Resolution**

**Level 1 (Community)**

.....  
.....  
.....  
.....  
.....

**Level 2 (District)**

.....  
.....  
.....  
.....

.....  
.....

Level 3 (Ministry/Implementing Agency)

.....  
.....  
.....  
.....  
.....

Level 4 (Court)

.....  
.....  
.....  
.....  
.....

Date of Conciliation Session: .....

Was Filer/Complainant Present:            Yes    No

Was field verification of complaint conducted? Yes    No

Findings of field investigation:

.....  
.....  
.....

**Summary of Conciliation Session Discussion Summary**

Issues

.....  
.....  
.....

Was agreement reached on the issues? Yes                    No

If agreement was reached, detail the agreement:

.....  
.....  
.....  
.....

If agreement was not reached, specify the points of disagreement:

.....  
.....  
.....

Name of Conciliator): .....

Signature/Thumb Print: .....

Signed: .....  
(Independent Observer e.g. Ward Committee representative/Opinion Leader)

Date: .....

**Implementation of Agreement**

Date of implementation:  
.....

Feedback from Filer/Complainant: Satisfied  Satisfied

If satisfied, sign off & date: .....  
(Filer/Complainant) (Conciliator)

If not satisfied, recommendation/way forward:  
.....  
.....  
.....  
.....

(Signature & date of Filer/Complainant)  
.....

### Annex E: Template for Budget for Preparation and Implementation of RPs

The preparation of a RP is normally informed by the output of the screening exercise the Feasibility and Detailed Design studies. These studies determine the project's scope and the extent of the proposed works and its impact on affected livelihoods, assets and displacement. This information is not currently available for the Project. The budget for RP cannot be determined at this stage however, an outline of the indicative costs of resettlement and compensation is indicated below and will be derived from expenditure relating to (1) the preparation of the resettlement instrument, (2) relocation and transfer, (3) income losses and livelihood restoration plan, and (4) administrative.

#### Indicative Outline of RP Budget

No.	ITEM Description	QTY	Unit Cost (USD)	Total Cost (USD)
<b>1.0</b>	<b>PREPARATORY PHASE COST</b>			
<b>1.1</b>	Inventory of affected persons, assets and livelihoods			
<b>1.2</b>	Valuation fees (LVD or private valuer)			
<b>1.3</b>	Stakeholder Consultation			
<b>1.4</b>	Preparation of resettlement plans or compensation reports			
<b>1.5</b>	<i>Subtotal 1 (Preparatory phase cost)</i>			
<b>2.0</b>	<b>COMPENSATION COST</b>			
<b>2.1</b>	Compensation for permanent acquisition of land			
<b>2.2</b>	Compensation for temporary occupation of land			
<b>2.3</b>	Compensation for the destruction of standing crops			
<b>2.4</b>	Compensation for the destruction of permanent immovable structures			
<b>2.5</b>	Compensation for temporary displacement of moveable structures			
<b>2.6</b>	<i>Subtotal 2 (Compensation cost)</i>			
<b>3.0</b>	<b>LIVELIHOOD RESTORATION /MITIGATION MEASURES COST</b>			
<b>3.1</b>	Compensation for PAPs loss of income			
<b>3.2</b>	Compensation for businessperson loss of income			
<b>3.3</b>	Cost of special assistance to vulnerable groups			
<b>3.4</b>	<i>Subtotal 3 (Livelihood restoration/mitigation cost)</i>			
<b>4.0</b>	<b>CAPACITY BUILDING &amp; IMPLEMENTATION COST</b>			
<b>4.1</b>	Capacity building for key stakeholders			
<b>4.2</b>	Disclosure of resettlement instrument			
<b>4.5</b>	Cost for compensation disbursement			
	Cost for RP Completion Audit			
<b>4.7</b>	<i>Subtotal 4 (Capacity building &amp; implementation cost)</i>			
<b>5.0</b>	TOTAL COST (addition of all subtotals 1&4)			
<b>6.0</b>	CONTINGENCY (5%-10% OF TOTAL COST)			
<b>7.0</b>	GRAND TOTAL COST (Total Cost + Contingency)			

## Annex F: Gap Analysis: Relevant Laws of Ghana and World Bank ESS5 Requirements

Key Issue	ESS Requirements	Ghanaian Legal Provisions	Identified Gaps	Gap-filling measures
Land Tenants/ Squatters	For those without formal legal rights to lands or claims to such land or assets that could be recognized under the laws of the country, the ESS 5 provides for compensation for the affected permanent structures; relocation or moving allowance for owners of the non-permanent structures to help them move from the project lands, and resettlement assistance in lieu of compensation for land, to help improve or at least restore their livelihoods	There is no constitutionally or legislatively recognized resettlement rights or assistance for those without recognized (formal) legal rights to land.	ESS 5 provides for compensation for the lost assets/ improvements owned by squatters, excluding land; Ghanaian laws do not. ESS 5 makes provisions for supporting vulnerable groups among the displaced; the Ghanaian laws have no provisions for special support for vulnerable people. Risk of making such PAPs worse off as compared to pre-displacement condition	All PAPs and owners of pre-cut off date assets, regardless of legal tenure, will be considered for some level of resettlement assistance (but there will be no compensation for land for squatters) and treated equally. Owners of non-permanent structures will be given supplemental assistance to remove their temporary structures from the project lands/RoW, and owners of permanent structures will be compensated for the replacement cost of the affected structures
Timing of Compensation Payments	Provide resettlement entitlements before displacement or restriction of access and use.	Prompt payment of adequate compensation (1992 Constitution of Ghana, Article 20, and Section 233 of Lands Act (Act 1036) of 2020)	Timing for payment of compensation is unspecified under Ghanaian law	All compensation payments will be made prior to displacement and before the commencement of civil works.
Calculation of Compensation and Valuation	Compensation determination is at full replacement cost for loss of assets attributable to the project, and livelihood restoration required.	Fair and adequate compensation (1992 Constitution of Ghana, Article 20 and Section 233 of Land Act, 2020 (Act 1036), and based on market value, improvement to the land, damages sustained because of acquisition, cost associated with change of residence or business as a result of the acquisition, other costs as necessary (Sections 255 and 256 of Land Act, 2020 (Act 1036)	There are no equivalent provisions in the Ghanaian legal framework specifying method of compensation calculation, or on providing relocation assistance, transitional support, or the provision of civic infrastructure. Determining what is fair and adequate is subjective.	The full Replacement Cost Approach (RCA) will be adopted for the calculation of compensation. Full Replacement Cost is calculated as the market value of the asset plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be considered. Livelihood restoration will be implemented.

Resettlement/ Relocation	Affected people who are physically displaced, are to be provided with residential housing, or housing sites, or, as required, agricultural sites at least equivalent to the old site. Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based. Assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels	In situations where inhabitants must be displaced, displaced persons are to be resettled on “suitable land with due regards for their economic wellbeing and social and cultural values”	World Bank Policy specifies that replacement properties must be equal or higher in value, and that there must be both a choice of properties, replacement in kind being the preferred option, and a cash alternative where appropriate.	Physically displaced PAPs are to be provided with sites at least equivalent to the old site. Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based (i.e. farmers, etc.)
Livelihood restoration	Livelihoods and living standards are to be restored in real terms to pre-displacement levels or better.	There are no specific laws or regulations explicitly specifying additional support for livelihood assistance	National Law does not specify assistance, but World Bank requires targeted assistance in terms of livelihood supports.	Applicable livelihood assistance for loss of land will form part of the entitlement framework
Vulnerable Groups	Particular attention to be paid to vulnerable groups during the development of the RP, especially those below the poverty line, the landless, the elderly, women and children, indigenous peoples, and ethnic minorities.	The laws do not make specific provisions for vulnerable persons. The Land Act does not explicitly prioritise vulnerable groups, though they are considered in the general compensation process.	Vulnerable PAPs are given the same treatment as all other PAPs under Ghanaian laws.	Vulnerable persons should be provided with further assistance to enable them to participate fully in the resettlement process and restore or enhance their living standards
Information and Consultations	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement.	Compulsory acquisition of land shall not be undertaken by the State without consultations with the persons of interest (Section 244 of the Lands Act, 2020 (Act 1036); Statutory Wayleaves Act, 1963, (Act 186).	There is no strict requirement in the Ghanaian law to keep affected persons abreast with the project timelines and stages, leaving them potentially unprepared to fit into implementation schedules.	Displaced people and their communities will receive timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. A stakeholder engagement plan will ensure informed participation throughout the project's life.
Disclosure	Draft RP should be submitted for public (in-country and external	Copies of the land acquisition and resettlement plan	No clear provision on the publication of the land	Draft RP should be submitted for public (in-country and

	website) for disclosure purposes. Encourages publication in the newspapers to indicate where the RP documents can be accessed.	shall be distributed to the displaced persons, the traditional authorities, community leaders, occupiers of the land and the District Assembly (Section 265(clause 4) The Lands Act (Act 1036), 2020.	acquisition and resettlement plan for wider publicity and access.	external website) disclosure purposes.
Grievance Redress Mechanism (GRM)	Appropriate and accessible grievance mechanisms to be established to receive and address specific concerns about compensation and relocation, including a recourse mechanism designed to resolve disputes in an impartial manner.	Use of Alternative Dispute Resolution (ADR) (Section 254 of Act 1036) and Access to Court of Law (Article 20 of 1992 Constitution of Ghana, and Section 254 of Act 1036)	Options are limited to ADR and a court of law. The Ghanaian law does not make specific requirements to establish local and project-level GRM.	An easily accessible, reliable, hierarchical and transparent grievance redress mechanism that is project-specific is to be implemented to resolve all grievances related to the project.. This will not supplant PAPs right to seek legal redress in the law court
Use of Resettlement Instruments	The proponent will develop a RP which will include a Livelihood Restoration Plan. The RP will be made available to the World Bank and the relevant national authorities.	In the event where inhabitants must be displaced, the state is to resettle them on “suitable land with due regard to their economic well-being and social and cultural values”. (1992 Constitution of Ghana, Article 20). Section 265(3) of Act 1036 provides for the resettlement of displaced inhabitants and the preparation of a Land Acquisition and Resettlement Plan.	The Land acquisition and resettlement plan in the Ghanaian context is for affected inhabitants who own the land/properties to receive compensation without livelihood restoration.	The Project RP shall include Livelihood Restoration Plan for affected persons whose livelihoods are affected as defined in the entitlement and eligibility matrix.
Monitoring and Evaluation	Requires monitoring/evaluation and reporting on effectiveness of RP implementation and take corrective action as necessary.	There is no specific mention of monitoring and evaluation in Section 265 (clause 3) of Act 1036.	Difficulty in assessing the effectiveness of prescribed mitigation, and in determining the types or system of monitoring and evaluation to be carried out.	Detailed monitoring and evaluation programs will be built into the RP and the overall project management process. An appropriate monitoring & evaluation system will include both an internal monitoring system to monitor the progress and implementation of the

				RP, and a completion audit will be undertaken by an external independent auditor.
--	--	--	--	-----------------------------------------------------------------------------------

### Annex G: Eligibility Criteria and Entitlement Matrix

Affected Assets	Type of Impact	Entitled Units	Eligibility criteria	Entitlement
Land	Permanent loss of land (Acquisition)	Landowner (individual, family, traditional authority, community)	Owns the affected plot of land under Ghana laws including customary laws, with or without land documentation	<ul style="list-style-type: none"> <li>• In-kind compensation based on displacement (land for land) at a suitable location comparable to the previous land or better with security of tenure; or</li> <li>• Cash compensation for land as determined by full replacement cost where primary livelihood is not land based and/or where there is a satisfactory demonstration of lack of adequate land and/or strong preference by the PAP. Compensation will be disbursed to various interest holders based on the formula established in Section 259 in Act 1036.</li> <li>• Land replacement for community lands or if unavailable, compensation (full replacement cost) be paid to the community with full consultation and participation.</li> <li>• cash compensation covering all administrative, land registration and transfer fees.</li> <li>• Support/facilitate land registration/documentation.</li> <li>• Right to salvage materials without deductions from compensation.</li> <li>• Disturbance allowance.</li> </ul>
	Temporary acquisition of land	Landowner (individual, family)/Squatter	Owns the affected plot of land under Ghana's laws, including customary laws	<ul style="list-style-type: none"> <li>• Compensation (in cash or kind) for the period of occupation based on occupancy as agreed among the parties. Compensation for loss of crops or assets on the land during the period of occupancy at full replacement cost.</li> <li>• Right to salvage materials without deductions from compensation.</li> </ul>

Affected Assets	Type of Impact	Entitled Units	Eligibility criteria	Entitlement
<b>Crops (food/cash crops and economic trees inclusive)</b>	Destruction of or damage to standing crops	Owner or Farmer	Have grown the affected crop (regardless of related plot ownership) or have recognized ownership rights to the crops	<ul style="list-style-type: none"> <li>• Cash compensation for standing crops counted at valuation date and valued based on the most current crop rates approved by LVD, or better.</li> <li>• Cost of replanting to the same maturity level, the estimated life and harvest from tree (fruit trees).</li> <li>• To the extent feasible, allow farmers to harvest or salvage crops before start of project interventions.</li> <li>• Right to salvage materials/harvest crops without deductions from compensation.</li> <li>• Disturbance/Transitional allowance.</li> </ul>
<b>Structures</b>	Destruction of immovable structures	Owner	Owns affected structure	<ul style="list-style-type: none"> <li>• Re-instatement (Construction of the structure on alternative land provided by owner, if land is available) or compensation at full replacement cost of structure.</li> <li>• Cost of moving (e.g. persons/goods in the structure under or belonging to owner including transportation, loading and offloading cost).</li> <li>• Disturbance/transitional allowance.</li> <li>• Right to salvage materials without deductions from compensation.</li> </ul>
		Occupant	Live in or use the affected structure on rental basis (when occupant is different from owner)	<ul style="list-style-type: none"> <li>• Cost of renting similar structure (e.g. for at least 1 year if the unexpired term is less than 1 year, or a term equal to the unexpired term of the rent, if the unexpired term is more than 1 year.).</li> <li>• Cost of moving out to a new place (including transportation, loading and off-loading cost).</li> <li>• Disturbance allowance of 10% of cost of renting similar structure or at a rate determined by the LVD.</li> <li>• Right to salvage materials without deductions from compensation.</li> </ul>

Affected Assets	Type of Impact	Entitled Units	Eligibility criteria	Entitlement
		Squatter	Live in or use the affected structure as at time of census	<ul style="list-style-type: none"> <li>• Cost of renting similar structure (e.g. for 1 year duration).</li> <li>• Cost of moving out to new place.</li> <li>• Disturbance allowance.</li> <li>• Right to salvage materials without deductions from compensation.</li> </ul>
	Partial Damage to Movable Structures/Properties	Owner or Occupier or Squatter	Live, use or work in the structure	<ul style="list-style-type: none"> <li>• Re-instatement to the original state or better</li> <li>• Disturbance/Transitional allowance</li> </ul>
	Movable Properties/structures	Owner	Owns the affected structure	<ul style="list-style-type: none"> <li>• Cost of moving affected structure to new site</li> <li>• Disturbance allowance</li> </ul>
		Occupant	Uses or occupies the affected structure	<ul style="list-style-type: none"> <li>• Cost of moving occupants to new site (transportation, loading and offloading cost)</li> <li>• Disturbance allowance (if owner is the same as occupant, he/she/they will not be entitled to this disturbance allowance)</li> </ul>
	Partial Damage to immovable Property	Owner or Occupier or Squatter	Lives, uses or works in the structure	<ul style="list-style-type: none"> <li>• Re-instatement to the original state or better.</li> </ul>
<b>Livelihoods</b>	Agriculture - destruction of economic or cash crop	Farmer	Use affected land for farming as livelihood sources (emphasis on perennial crops. Annual crops can be harvested prior to land entry or destruction)	<ul style="list-style-type: none"> <li>• Cash compensation for any temporary loss of income or livelihood incurred because of the project during the transition period (period required to reestablish farm elsewhere).</li> </ul>
	Permanent loss of business location	Business owner (maybe distinct from owner of structure where business takes place)	Operates a business on Project affected land, regardless of the land ownership situation (including squatters)	<ul style="list-style-type: none"> <li>• Compensation for loss of profit/ income during period of relocation.</li> <li>• Provide alternative resources with equivalent livelihood-earning potential and accessibility.</li> <li>• Provide cost of renting a new place (space) of similar locational characteristics for one year (if the unexpired term is less than 1 year, or a</li> </ul>

Affected Assets	Type of Impact	Entitled Units	Eligibility criteria	Entitlement
				term equal to the unexpired term of the rent, if the unexpired term is more than 1 year) <ul style="list-style-type: none"> <li>• Cost of moving wares to a new location</li> <li>• Assistance with finding alternative location (if feasible)</li> <li>• Disturbance/transitional allowance</li> </ul>
		Employees other than Business owner or owner of business structure	Works with business owner or operator	<ul style="list-style-type: none"> <li>• Six (6) months wages as paid by the employer</li> </ul>
	Temporary loss of business location	Business owner (maybe distinct from owner of structure where business takes place)	Operates a business on project affected land, regardless of the land ownership situation (including squatters)	<ul style="list-style-type: none"> <li>• Compensation for loss of profit/income/occupation during period of cessation of operations and/or due to reduced access by clientele.</li> <li>• Assistance in finding temporary work locations during period of disturbance</li> <li>• Cost of moving wares to temporary relocation site</li> </ul>
		Employees other than Business owner or owner of business structure	Works with business owner or operator	<ul style="list-style-type: none"> <li>• Provide wages equivalent to amount lost during period of cessation of operations and/or due to reduced access by clientele</li> </ul>
	Hawkers	Trades in the Project Zone	<ul style="list-style-type: none"> <li>• Flat rate established during PAPs socio-economic survey</li> </ul>	
<b>Cultural heritage resources (e.g. sacred site)</b>	Relocation or removal of cultural heritage resource	Owner (individual or community)	Use or pay homage for cultural heritage resource/ sacred site	<ul style="list-style-type: none"> <li>• Avoid any impact on cultural heritage resources by finding alternative locations.</li> <li>• If impact is unavoidable, ensure successful relocation or removal of cultural resource/ sacred site in accordance with Chance Find procedures and in consultation with affected parties and relevant stakeholders (owners, managers, responsible government agencies and users)</li> </ul>

Affected Assets	Type of Impact	Entitled Units	Eligibility criteria	Entitlement
<b>Communal Resources</b>	Loss of access to communal resource materials (e.g., fruit, wood, herbs, etc.)	Community	Resource that provide the foundation for livelihoods – whether these are used for domestic or productive use. PAPs losing access to resources shall be identified and notified as part of the compensation process.	<ul style="list-style-type: none"> <li>• Avoid any impact on communal resources by finding alternative locations.</li> <li>• If impact is unavoidable, provide alternative sources of income-generating activities for PAPs, particularly those identified as vulnerable.</li> </ul>
<b>Vulnerable Groups/ Individuals</b>	Loss of land, assets, business (livelihood) location, crops, and/or damage to structures, etc.	Land/structure owner, business owner or employee	Vulnerable persons or groups have not been given any special attention under Ghanaian laws	<ul style="list-style-type: none"> <li>• All entitlements in the category he/she falls within (i.e. tenant, structure owner, landowner business owner)</li> <li>• Payment of compensation at the premises of the vulnerable PAP</li> <li>• Arrangement of transportation (trucks and people to assist in loading and off-loading) to new location, if necessary</li> <li>• Support PAP in the search for new accommodation, land, space to do business and re-instatement of the affected structure.</li> </ul>