Republic of The Gambia

Emergency Education COVID-19 Response Project (P174035)

Draft for Appraisal

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

June 2020
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia will implement The Gambia Emergency Education COVID 19 Response Project P174035 (the Project), through the Ministry of Basic and Secondary Education. The Global Partnership for Education (GPE) (hereinafter the (Association) has agreed to provide financing for the Project.

2. The Republic of The Gambia will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.

3. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), and Stakeholder Engagement Plans (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.

4. The Republic of The Gambia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1, above.

5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by The Republic of The Gambia as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

6. As agreed by the Association and The Republic of The Gambia, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, The Republic of The Gambia will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Republic of The Gambia. The Republic of The Gambia will promptly disclose the updated ESCP.

7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Republic of The Gambia shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include work accidents, generation of solid waste, noise pollution, generation of sewage, land use change, dust generation, exclusion related risks (i.e. learners with disabilities), monitoring of provision of goods and services to households, as well as sexual exploitation and abuse (SEA), sexual harassment (SH), violence against children (VAC) and gender-based violence (GBV).
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<th>MATERIAL MEASURES AND ACTIONS</th>
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<td>MONITORING AND REPORTING</td>
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<td><strong>A</strong> REGULAR REPORTING</td>
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<td>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s), the implementation of the action plan to mitigate risks and responses to gender-based violence, sexual exploitation and abuse, sexual harassment and violence against children (as well as the preparation of reports of the consultations with illustrations, including photos and attendance list when safe and appropriate to do so).</td>
<td>Quarterly during the Project’s implementation in conjunction with the Project’s progress reports.</td>
<td>PCU</td>
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<td><strong>B</strong> INCIDENTS AND ACCIDENTS</td>
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<td>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including but not limited to loss time injuries, fatalities, water courses pollution, significant air pollution, inefficient sewage management, livelihoods and land, any allegations of gender-based violence (GBV), sexual exploitation and abuse/harassment (SEA/SH), violence against children. For incidents related to GBV/SEA/SH, to guarantee confidentiality, only non-identifiable information will be shared (type of violence, age/sex of survivor and link to the project - if known). Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</td>
<td>Notify the TTL within 48 hours after learning of the incident or accident with an initial report. A detailed report would be provided within a timeframe acceptable to the Bank, as requested.</td>
<td>PCU</td>
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### MATERIAL MEASURES AND ACTIONS

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<th>C</th>
<th>CONTRACTORS MONTHLY REPORTS</th>
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<td>Contractors recruited to support the project’s implementation will be required to provide monthly monitoring reports to the Project Coordination Unit on the implementation of the environmental and social clauses. The Recipient, upon request, will submit such monthly reports to the Association.</td>
<td>The implementation monitoring reports will be prepared and transmitted on a quarterly basis. These reports will be compiled on an annual basis.</td>
<td>PCU</td>
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### ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

#### 1.1 ORGANIZATIONAL STRUCTURE

The Ministry of Basic and Secondary Education (MoBSE) will be the implementing agency. The project will utilize the Project Coordination Unit (PCU) managing the current Education Sector Support Program (ESSP – P162890) which has been effective since August 2018. The PCU will be responsible for the day-to-day project implementation. A Project Coordinator heads the existing PCU however; the Unit does not have a qualified environmental specialist and a social specialist on staff. Currently, two consultants (an environmental specialist and a social development specialist) have been hired to provide interim support while the Unit arranges to recruit the two (2) specialists on a full-time basis to oversee the environmental and social risk management of the project.

The capacity of the MoBSE to manage the environmental and social (E&S) risks will be developed through ongoing support and training by World Bank officers and by environmental and social specialists in accordance with the assessment or institutional needs of the Project Concept Note, including specialists on the following subjects: gender-based violence, violence against children and sexual exploitation and abuse, and sexual harassment (GBV/SEA/SH) and Grievance Management.

The PCU will recruit the two (2) additional specialists within 30 days after project effectiveness and both shall be retained throughout Project implementation. They will support the E&S risk assessment and preparation of E&S risk management instruments and will oversee the E&S risks management of the project during the project implementation.

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<td>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</td>
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<td>a. Prepare, disclosed and implement an Environmental and Social Management Plan (ESMP) and other instruments required, in accordance with the requirements of the ESSs.</td>
<td>a. ESMP to be prepared 30 days after effectiveness.</td>
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<td>b. Update environmental and social management plans or other instruments based on updated guidance by WHO on COVID19, in accordance with the requirements of the ESSs and in a manner acceptable to the Association.</td>
<td>b. ESMP updated whenever necessary (change guidelines)</td>
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<td>1.4 MANAGEMENT OF CONTRACTORS</td>
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<td>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</td>
<td>During the preparation of the procurement documents</td>
<td>PCU</td>
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<td>ESS 2: LABOR AND WORKING CONDITIONS</td>
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<td>2.1 LABOR MANAGEMENT PROCEDURES</td>
<td>To be developed within the same timeframe as the ESMP and submitted to the Bank for review and approval before the implementation of related activities. The E&amp;S standards will be systematically applied as part of all the recruitment and human resources management processes mobilized within the framework of the project. These procedures will apply throughout Project implementation.</td>
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<td>The Recipient shall develop and implement Labor Management Procedures (LMP) for the project in accordance with the applicable requirements of ESS2. These procedures will be integrated into the ESMP and will make it possible to ensure the implementation of adequate occupational health and safety measures (including emergency preparedness and response measures) and set out grievance arrangements for Project workers. The Recipient will also be required to provide awareness raising workshops on the Codes of Conduct. All Project staff will sign the codes of conduct as soon as they take office and immediately for new employees upon hire. They will also be required to provide awareness raising workshops on the Codes of Conduct.</td>
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<td>MATERIAL MEASURES AND ACTIONS</td>
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<td><strong>2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS</strong></td>
<td>The grievance mechanism will be operational prior to engaging Project workers and maintained throughout Project implementation.</td>
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<td>Ensure that Project contractors and subcontractors implement a suitable Grievance Mechanism (GM) for labor grievances that will be prepared prior to the start of any project activities. This GM will deal with any work or employment related matter under the project, as it pertains to project staff or workers that are involved in the project. The GM must be widely disclosed in a manner appropriate for all workers, easily accessible and consistent with ESS 2. The Republic of The Gambia will ensure that project workers using this GM will not be subject to any form of discrimination or repression by employers and that their identity will be maintained undisclosed to the public. These workers will be informed of the existence of the complaint’s management mechanism at the time of hiring and of the measures taken to protect them from reprisals for having used it. The Project will ensure that the complaint management system is inclusive, participatory, transparent, and easily accessible to all. The GM will be sensitive to GBV/SEA/SH with safe and accessible entry points and complaint handling procedures, as well as referrals to GBV service providers.</td>
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<td><strong>2.3 OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</strong></td>
<td>The OHS specific plans will be developed before the start of work.</td>
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<td>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP as already provided for in activity 1.3 above.</td>
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<td><strong>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</strong></td>
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<td><strong>3.1</strong></td>
<td>Before starting the activities</td>
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<td>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: manage waste linked to the activities of sub-component 2.1 of the project (the cleaning and disinfection of schools) could generate the production of waste (product containers, contaminated materials, ordinary waste, etc.)</td>
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<td><strong>3.2</strong> RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMP to be prepared under action 1.3 above.</td>
<td>To be developed within the same timeframe as the ESMPs and submitted to the Bank for review and approval before the implementation of related activities. Once approved, the measures will apply throughout project implementation.</td>
<td>PCU</td>
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**ESS 4: COMMUNITY HEALTH AND SAFETY**

| **4.2** COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, measures to: minimize the potential for community exposure to communicable diseases including COVID 19; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project; prevent and respond to sexual exploitation and abuse, and sexual harassment and include these measures in the ESMP to be prepared in a manner acceptable to the Association. | To be developed within the same timeframe as the ESMPs and submitted to the Bank for review and approval before the implementation of related activities. Once approved, the measures will apply throughout project implementation. | PCU |

| **4.3** GBV AND SEA/SH RISKS: Organize awareness raising programs on SEA/SH issues and implement an effective grievance redress mechanism that deals effectively with SEA/SH issues. The Recipient will carry out a comprehensive GBV assessment, adopt and implement a GBV action plan to manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA), sexual harassment (SH), as well as a strategy to combat the recruitment of children. Moreover, codes of conduct will be signed by workers (including suppliers, subcontractors, service providers and their staff) and necessary training provided. Training will include information and workers will be made aware of the consequences of non-compliance. | Prepare and submit the GBV Action Plan (including mapping of referral services) for the Bank’s approval before the preparation of the procurement documents. Once approved, the GBV Action Plan will be implemented throughout Project implementation. | PCU |
### 4.4 GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:

There will be SEA/SH mitigation procedures in place, including training, awareness raising and monitoring before and during project implementation. This will be defined in a Risk Mitigation Action Plan to be included in the ESMP and responses to SEA/SH that the Project will ensure its development and its strict implementation.

Prepare and submit the SEA/SH Action Plan for the Bank’s approval before the preparation of the procurement documents. Once approved, the GBV Action Plan is implemented throughout Project implementation.  

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### 4.5 SECURITY PERSONNEL:

Prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Association.

The code of good conduct will be of strict enforcement for all those intervening, including the staff of suppliers and service providers.

Resorting to public security services (National Police), in case of “force majeure”, will be done in compliance with the conditions foreseen by the law. The Recipient will ensure that background checks are conducted for these security personnel, as well as trainings on the use of force, as well as respect for human rights and SEA/SH/VAC. The Recipient is required to promptly investigate any allegation of misconduct and to ensure that repetition of misconduct is avoided.

Prior to engaging security personnel and thereafter implemented throughout Project implementation.  

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### ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

Not Relevant

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### ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

Not Relevant

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### ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES

Not Relevant

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### ESS 8: CULTURAL HERITAGE

8.1 CHANCE FINDS: Not Relevant

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### ESS 9: FINANCIAL INTERMEDIARIES

Not Relevant

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### ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE
### 10.1 STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION

A draft stakeholder Engagement Plan (SEP) has been prepared which will be updated, adopted and implemented as needed, and as communications and stakeholder engagement and communications needs evolve.

As per the SEP, the Recipient will ensure a stakeholder engagement plan that includes culturally appropriate formats, takes into account literacy needs, language as well as ensure inclusive participation of vulnerable groups and individuals. Consultations will consider and respect COVID-19 social distancing and other health and safety measures in place by the Government and recommended by the WHO when required.

An approved SEP will be delivered by the decision meeting and will be updated no later than 30 days after project effectiveness to reflect options for engaging stakeholders during the pandemic.

The SEP will be applied throughout project implementation.

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### 10.2 PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.

This mechanism also includes a special channel for handling complaints related to issues of gender-based violence, sexual exploitation and abuse, sexual harassment, and violence against children. It should include several accessible and safe entry points, including access to communicate in local languages, specific and separate information sessions for women and girls, access to medical, psychosocial, and legal services through referral protocols and procedures for managing complaints that guarantee confidentiality and focus on survivors.

Will be operational prior to project activities and will apply throughout project implementation.

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### CAPACITY SUPPORT (TRAINING)

**CS1**

The ESCP proposes a training plan covering the topics presented below. The plan will be adapted to the needs of project stakeholders during the implementation of the Project.

Training on Environmental and Social Standards applicable to the project for the PCU staff and collaborating partners (government agencies, NGOs etc.) as well as monitoring and recording grievances and public engagement during and post COVID19, and project monitoring during and post-COVID.

A training plan will be developed two months after project effectiveness and shall be applied throughout project implementation.
<table>
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<tr>
<th><strong>CS2</strong></th>
<th><strong>Training on community health and safety for PCU staff, stakeholders, communities and Project workers</strong> on:</th>
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<tr>
<td></td>
<td>• Stakeholder mapping and engagement (including during COVID19)</td>
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<td>• Review of ESMP</td>
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<td>• Emergency preparedness and response</td>
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<td>• Community health and safety</td>
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<td>• Prevention of GBV/SEA/SH and violence against children</td>
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<td>• Identification of vulnerable groups and mitigation measures to enhance inclusion and accessibility to project benefits</td>
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<td>• Good practices in enhancing social inclusion, including incorporating local practices and traditional knowledge, culturally-informed gender sensitive approaches</td>
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<td>• COVID 19 protection measures</td>
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<th><strong>CS3</strong></th>
<th><strong>Training on grievance mechanism for PCU staff, stakeholders and communities</strong></th>
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<td>Design and realization of the module by integrating at least the following aspects:</td>
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<td>• Documentation, recording and processing procedures</td>
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<td>• Grievance uptake and resolution procedures</td>
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<td>• Use of the mechanism by the different stakeholders, especially vulnerable groups</td>
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<td>• Method of handling complaints related to GBV, SEA, SH, VAC</td>
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