**REPUBLIC OF SIERRA LEONE**

**Ministry of Basic and Secondary School Education (MBSSE)**

**FREE EDUCATION PROJECT**

**ENVIRONMENTAL and SOCIAL**

**COMMITMENT PLAN (ESCP)**

**May 2019**

**World Bank MBSSE/ FREE Education Project**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Ministry of Basic and Secondary School Education (MBSSE) of Sierra Leone is planning to implement the FREE Education Project (the **Project**). The International Development Association hereinafter the Bank/the Association] has agreed to provide financing for the Project.
2. The MBSSE will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions.
3. Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the Environmental and Social Management Plan and Resettlement Action Plan that have been developed for the Project.
4. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. MBSSE 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 Bank/Association by MBSSE as required by the ESCP and the conditions of the legal agreement, and the Bank/Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank/Association and MBSSE, 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, MBSSE will agree to the changes with the Bank/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 Bank/Association and the MBSSE. The MBSSE will promptly disclose the updated ESCP. Depending on the project, the ESCP may also specify the funding necessary for completion of a measure or action.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the MBSSE shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, gender-based violence.

| **[FREE Education Project]****ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN** **DATE** |
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| ***Summary of the Material Measures and Actions to Mitigate the Project’s Potential Environmental and Social Risks and Impacts*** | ***Timeframe*** | ***Responsibility / Authority and Resources/Funding Committed*** |  ***Date of Completion***  |
| **ESCP Monitoring and Reporting** |
|  | **REGULAR REPORTING**: MBSSE will prepare and submit regular monitoring reports on the implementation of the ESCP. The report will among others include (i) status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions.  | *Quarterly throughout project implementations* |  *MBSSE, through the FREE Education Project Secretariat be responsible for funding and submitting updated ESCP for review, discussion and agreement with the Bank*  | Throughout the Project life time. |
|  | **INCIDENTS AND ACCIDENTS NOTIFICATION**: project will promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including situations of fatalities or serious bodily harm and incidents of Gender Based Violence. The report will include sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. Incidents and accidents include kidnapping, GBV, communicable diseases, violence, fatalities, infectious, all fires, and occupational injuries. | *Within 48 hours and no later than 72 hours after occurrence of the incident or accident.*  | Project Contractors will be responsible for submitting incident/accidents reports to the FREE Education Project Secretariat of MBSSEFREE Education Project Secretariat of MBSSE will submit incident reports to the Bank  | Throughout the Project life time. |
| **SUMMARY ASSESSMENT** |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| 1.1 | **ORGANIZATIONAL STRUCTURE**: FREE Education Project Secretariat of MBSSE shall establish an EHS desk with qualified E&S experts (Environmental Specialist, social and Gender Specialist) The FREE Education Project Secretariat E&S Specialists will be supported by Environment and Social Officers at the Regional and District levels to implement the project. This structure will be maintained throughout Project implementation.  | *The FREE Education Project Secretariat of the MBSSE with E&S Specialists will be set up at least 3 months after project effectiveness.*  | The MBSSE/FREE Education Project are responsible for funding the setting up and operations of the EHS Unit | The E&S Specialists at the Free Education Project Secretariat will be at post until project completion |
| 1.2 | **ENVIRONMENTAL AND SOCIAL ASSESSMENT:** Subprojects will be screened per the procedures outline in the ESMF as sites are identified. Based on the screening results, detailed environmental and social assessments may be conducted and accompanied by the relevant ESMPs to address any risks identified during the process. The ESIA will include the assessment of GBV risks. | *Undertaken once site project locations are identified and prior to the start of civil works which is part of the second- year investments.*  | FREE Education Project Secretariat of MBSSE to supervise the impact assessment studies. Funding for consultancy services shall be covered by the FREE Education Project | Prior to commencing of the Subproject civil works |
| 1.3 | **MANAGEMENT TOOLS AND INSTRUMENTS:** Develop, adopt, consult on and disclose an Environmental and Social Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholder Engagement Plan and Environmental and Social Commitment Plan (ESCP) satisfactory to IDA.Secure environmental permits for all new construction and rehabilitation under the FREE Education Project*Develop sub* *Subprojects Screening Forms and Impacts Checklist Forms as part of the ESMF to be used to screen all sub-project to determine requirement for follow ESHIA, ESMPs, RAPs etc**Environmental and Social Management Plans (ESMPs) and Resettlement Action Plan will be prepared and disclosed.* *Environmental and Social Assessment process for subprojects will be done after Subprojects screening.*Draft Labor Management Procedures to be included in ESMF. Contractor is required to Update this into a Labor Management Plan and ensure compliance during implementation.Implement ESMP, RPF, SEPDetailed GBV Assessment to be carried out during ESHIA studies and action plan to be developed by contractor as part of contractor ESMP. | *The ESMF, RPF, and SEP will be completed prior to project appraisal**prior to the start of civil works* *Prior to construction of school infrastructure which is part of the second-year investments.**prior to the start of civil works* *Throughout project implementation**Throughout project implementation**Prior to commencement of civil works* | MBSSE/ through consultants / funding from the Project budget MBSSE/ through E&S consultantsMBSSE/ through consultantsFREE Education Project E&S specialists. MBSSE/ consultant/ contractor/ funding from project budgetMBSSE/ FREE Education secretariat/ funding from project budget. MBSSE/ through consultants/ contractor. | Before project appraisalPrior to commencement of civil works.Prior to commencement of civil worksPrior to commencement of civil worksThroughout project implementationThroughout project implementationPrior to commencement of civil works |
| 1.4 | **MANAGEMENT OF CONTRACTORS:** MBSSE shall develop and implement Labor management Plan for managing contractors and subcontractors:* environmental and social requirements will be included in the procurement and contracting process including bidding documents, for potential civil works*.*
* relevant requirements are included in contracts and subcontracts (reflecting ESSs and ESCP);
* codes of conduct are required of contractors and subcontractors and their workers to prohibit sexual harassment and exploitation and training of workers on their obligations under the CoC.
* Contractor to prepare a costed GBV Action Plan as part of the contractor ESMP.
* Preparation of a detailed contractor ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&S risks
* Monitor Contractor commitment and compliance
* Ensure contractors provide details on contractor’s oversight on environmental, social, health and safety (ESHS) performance
* Contractor to develop a grievance redress mechanism to handle concerns of their employees
* MBSSE has developed a Labor Management Procedure Which Contractors shall update into a plan and comply with during Implementation.
 | *prepared together with C-ESMP before commencement of civil works.* | MBSSE /FREE Education Project Secretariat, E&S specialist, procurement officer. Funding from the project budget.  | Throughout the Project implementation  |
| 1.5 | **PERMIT, CONSENTS AND AUTHORIZATIONS**: MBSSE shall facilitate the issuance of the environmental permits and all necessary authorization from ministries, departments and agencies (MDA), such as EPASL. MBSSE shall ensure that the contractor complies with the conditions established in these permits, consents and authorizations throughout Project implementation. | *All authorization shall be obtained prior to mobilization of contractors**Renewal of permits will be the responsibility of the MBSSE* | MBSSE is responsible for obtaining Environmental licenses. The cost of obtaining the licenses shall be covered by the project. Contractor shall obtain any other relevant license during implementation. | Permits will be renewed as stipulated in the permit condition until the end of the project  |
| 1.6 | **THIRD PARTY MONITORING***:* a third party shall be engaged to complement and verify the monitoring of environmental and social risks and impacts of the Project. Project will also conduct RAP completion audit following completion of RAP implementation and ESMP audit 3 months before completion of civil works.   | *Third party monitoring will be done annually.* *RAP completion audit done after RAP implementation and ESMP Audit done 3 months before completion of works.* | MBSSE to hire the services of a consultant. Payment for monitoring is to be covered by the project | Monitoring continues until completion and decommissioning of project |
| 1.7 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | None |  |  |
| **ESS 2: LABOR AND WORKING CONDITIONS**  |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**: Labor management procedures (LMP) has been developed by the MBSSE. The LMP set out the way in which project workers will be managed, in accordance with the requirements of Sierra Leone national law and ESS 2. The plan will address the way in which ESS2 will apply to different categories of project workers, including direct workers, and the way in which the Borrower will require third parties to manage their workers. The contractor will be required to update the Labor Management Procedure into a Plan during implementation and comply with its requirement.  | *Prior to the preparation of procurement documents.* *Maintain procedures throughout Project implementation.* | MBSSE/ E&S specialists shall ensure that the selected contractor meets these requirements | Effective throughout the project life, and reviewed on a quarterly basis |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**: The contractor shall develop and implement a GRM for their staff, and this shall be approved by the FREE Education Project Secretariat of MBSSE and the Bank. | *prior to recruitment of staff or workers and implemented throughout Project implementation.* | MBSSE shall ensure that the mechanism is in place before recruitment of staff is conducted by contractor; | Effective throughout the project life, and reviewed as and when necessary |
| 2.3 | **OHS MEASURES**: Contractors working on the Project shall develop and implement approved occupational, health and safety (OHS) plan/measures. Contractor’s Health and safety officer and MBSSE E&S specialists shall train/orient employees of Project Contractors on various aspects of OHS relevant to the project  | *Prior to initiating construction, and implemented throughout Project life* | MBSSE/ FREE Education Project Secretariat / E&S Specialists/ Contractors  | Effective throughout the project life, and reviewed as and when necessary |
| 2.4 | **EMERGENCY PREPAREDNESS AND RESPONSE**: Emergency Preparedness and Response measures incorporated in OHS measures guideline as part of subproject screening ESIAs/ESMPs prior to commencement of works. | *Prior to initiating construction. Maintained throughout Project implementation.* | MBSSE/ FREE Education Project Secretariat / E&S Specialists/ Contractors. This is covered by the project | Effective throughout the project life, and reviewed as and when necessary |
| 2.5 | **PROJECT WORKERS TRAINING**: Health and Safety training shall be provided to employees of Project Contractors by the contractor Health and Safety officer.  | *Prior to initiating construction, with quarterly refresher and task-specific training sessions during the entire construction phase* | MBSSE/ FREE Education Project Secretariat / E&S Specialists/ are responsible for providing oversight of compliance with Health and Safety Requirements  | Periodically throughout the project life, and revisited as and when necessary |
| 2.6 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | None |  |  |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  |
| 3.1 | **MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:** Project Contractors shall develop and implement a general waste management plan including hazardous materials and chemicals. The plan would be annexed to the ESMP.  | *Waste management plan as part of ESMP and applied throughout Project implementation.* | Contractor/ MBSSE FREE Education Project Secretariat/ Project Environmental specialist. funding covered by the project | Effective throughout the project life, and reviewed as and when necessary |
| 3.2 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project***  | None |  |  |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** |
| 4.1 | **TRAFFIC AND ROAD SAFETY**: Project Contractors shall be required to develop and implement measures and actions in the sub project ESMPs to assess and manage traffic and road safety risks.  | *Prior to initiating construction. Maintained* *throughout Project implementation.* | MBSSE/ FREE Education Project Secretariat / E&S Specialists/  | Effective throughout the project life, and reviewed as and when necessary |
| 4.2 | **COMMUNITY HEALTH AND SAFETY:** The Project ESMF shall guide the Contractors to develop and implement adequate measures and actions to assess and manage specific risks and impacts to the community and beneficiary schools arising from project activities. Contractors measures, and work methods shall be validated by the local authorities and SMCs and approved by the FREE Education Project Secretariat MBSSE  | *Prior to initiating construction and employee recruitment. Maintained* *throughout Project implementation.* | MBSSE/ FREE Education Project Secretariat / E&S Specialists/ shall ensure that the document is approved and available prior to commencement of construction activities as well as supervise implementation of the CHS by the contractor. | Effective throughout the project life, and reviewed as and when necessary |
| 4.3 | **GBV AND SEA RISKS**: GBV and SEA risks to be assessed as part of social assessment and ESHIA. Project to hire a local NGO to assist in GBV response including supporting the design of GBV sensitive GRM, training and awareness raising on GBV for the local communities and MBSSE, ensure that care seeking behaviors and knowledge of how and where to report GBV cases are known and support survivors to receive appropriate support services (medical/physical-social counseling and legal aid as agreed with the survivor). While the services of a gender-based NGO working in the project area is solicited to handle GBV and SEA, the contractor shall develop a well costed GBV action Plan and strictly abide by the measures provided.  | *Services of a GBV/SEA service provider NGO will be recruited prior to contractor mobilization and Maintained throughout Project implementation.* | MBSSE/ FREE Education Project Secretariat / project E&S Specialists/ Contractors. Funding as part of project cost. | Effective throughout the project life, and reviewed as and when necessary |
| 4.4 | **GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION**: GBV action plan will be required by the contractor as part of C-ESMP with adequate funding for implementation. | *Monitoring of compliance to contractor GBV Action Plan throughout the implementation period of the project* | MBSSE/ FREE Education Project Secretariat / project E&S Specialists/ Contractors/ GBV service provider. Funding as part of contractor cost for ESMP implementation | Effective throughout the project life |
| 4.5 | **EMERGENCY RESPONSE MEASURES**: The contractor shall implement emergency preparedness and response plan in project ESMPs.  | *ESMPs will be available prior to initiating construction. Maintained throughout Project implementation.* | MBSSE/ FREE Education Project Secretariat / project E&S Specialists/ Contractors. | Effective throughout the project life, and reviewed as and when necessary |
| 4.6 | **SECURITY PERSONNEL**: The project and its contractors will not use military or paid security forces for site security.  | *Not relevant for this**project* |  |  |
| 4.7 | **TRAINING FOR THE COMMUNITY:** MBSSE through the consultant shall conduct training for the community designed to heighten awareness of risks and to mitigate impacts specified including:* communicable diseases/HIV-AIDS/STI awareness and prevention
* community grievance redress mechanism as described in the Stakeholder Engagement Plan/ ESMF/RPF
* process for resolving conflicts between workers and community members
* GBV and SEA and Child protection.
 | *Prior to initiating construction, with regular refresher training sessions* | MBSSE/ FREE Education Project Secretariat / project E&S Specialists/ Contractors. cost covered by the project | Periodically throughout the project life, and revisited as and when necessary |
| 4.8 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | None |  |  |
| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** |
| 5.1 | **LAND ACQUISITION AND RESETTLEMENT:** *The Project has prepared a Resettlement Policy Framework (RPF) which will be disclosed prior to appraisal. The RAP will be prepared as required when subproject locations are identified* | *Prior to the construction of school physical infrastructure which is part of the second- year investments* | MBSSE/ FREE Education Project Secretariat / project E&S Specialists/ will ensure that the RAP has been done consistent with ESS 5 before mobilization of contractor | Before commencement of construction works |
| 5.2 | **RESETTLEMENT PLANS**: A RAP shall be developed by a consultant, appointed by MBSSE or consultancy firm as appropriate and implemented by MBSSSE and the consultant, *when subproject locations are identified, and it is determined that activities will involve involuntary resettlement.*  | *RAPS will be implemented Prior to the construction of school physical infrastructure which is part of the second-year investments.* | MBSSE/ FREE Education Project Secretariat / E&S Specialists/. Cost internalized as part of project cost | Before commencement of construction works |
| 5.3 | **MONITORING AND REPORTING:** MBSSE shall ensure that monitoring and reporting on land acquisition and resettlement activities are conducted throughout the project as part of project regular reporting channels and separately as requested by the World Bank. | *part of project quarterly reports* | MBSSE through the project E&S specialists and independent third-party monitors shall ensure that the RAP has been implemented, monitored and documented according to ESS5 before mobilization of contractor | Throughout project life |
| 5.4 | **GRIEVANCE MECHANISM**: A Grievance Redress Mechanism (GRM) is being developed as part of the ESMF and RPF will be completed before commencement of project activities. The GRM will incorporate existing GRM systems in place at the MBSSE and the local level.   | *In place and functional 3 months after project effectiveness and prior to mobilization of contractor for civil works.*  | MBSSE shall ensure a GRM has been set up and is being implemented before mobilization of contractor | Throughout project life |
| 5.5 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | *None* |  |  |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS**: The project will screen subproject activities using the screening tool developed under the ESMF to determine potential biodiversity risks and impacts and make recommendations.Sites within one (1) kilometre radius of natural and critical habitats or environmentally sensitive areas shall be declared ineligible for construction during the screening and site selection Work shall not be carried out in sensitive ecosystems/habitats/species, such as protected areas, forests, wetlands and IUCN listed species to avoid elaborate offsets and project delays. The Project will also consider the views, roles, and rights of groups, including local non-governmental organizations (NGOs) and local stakeholder communities, and involve such in planning, designing, implementing, monitoring, and evaluating the project. Involvement may include identifying appropriate conservation measures, managing protected areas and other natural habitats, and monitoring and evaluating specific actions | *Prior to commencing sub-project civil works.* | MBSSE/ FREE Education Project Secretariat, E&S specialist.  *funding from project budget*  | prior to commencement of civil works |
| 6.2 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | None |  |  |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** |
| 7.3 | **GRIEVANCE MECHANISM:** N/A | *NA* |  |  |
| 7.4 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project N/A*** |  |  |  |
| **ESS 8: CULTURAL HERITAGE** |
| 8.1 | **CHANCE FINDS**: The contractor shall implement a Chance Find procedure in line with the ESMF/ESMP in preparation for any ‘chance’ or accidental finds during the project. In the event of a find, the Monuments and Relics Commission (MRC) that is entrusted with the protection of cultural heritage in Sierra Leone shall be contacted. | *Prior to the Commencement of civil Works as part of the sub project screening and Site Selection* | MBSSE/ FREE Education Project Secretariat / E&S specialists  | Throughout project life |
| 8.2 | **CULTURAL HERITAGE**: The project will take cognizance of tangible and intangible cultural heritage sites and items, including potential archaeological heritage within the project’s area of influence. The Project will adopt measures such as undertaking meaningful consultations with stakeholders regarding cultural heritage and implementing basic mitigation measures at the construction phase, such as a chance find procedure. | *Prior to the Commencement of civil Works as part of the sub project screening and Site Selection*  | FREE Education Project Secretariat MBSSE/ Contractors  | Throughout project life |
| 8.3 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | None |  |  |

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| **ESS 9: FINANCIAL INTERMEDIARIES** |
| 9.1 | ESMS: *Not relevant to this project since there are no FIs involved in this project. However, the project will be guided by this standard when applicable.* | *Not relevant* |  |  |
| 9.2 | FI ORGANIZATIONAL CAPACITY: *Not relevant* | *Not relevant* |  |  |
| 9.3 | SENIOR MANAGEMENT REPRESENTATIVE: *Not relevant* | *Not relevant* |  |  |
| 9.4 | Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project | None |  |  |

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| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| 10.1 | **SEP PREPARATION**: MBSSE has prepared and shall disclose a Stakeholder Engagement Plan (*SEP*) for the design and implementation of the project prior to appraisal. | *Prior to appraisal* | MBSSE/ FREE Education Project Secretariat. Cost is covered by the project | SEP was ready by appraisal but will be reviewed and updated quarterly |
| 10.2 | **SEP IMPLEMENTATION**: Implement the SEP. MBSSE resources, such as the communications office and the control room shall be leveraged in engaging stakeholders.Stakeholder engagement has commenced and shall continue throughout the life of the project | *Throughout Project implementation* | MBSSE/ FREE Education Project Secretariat. Cost is covered by the project | Throughout project life |
| 10.3 | **PROJECT GRIEVANCE MECHANISM**: Develop and implement the arrangements for the grievance mechanism.See sections 2.2 and 5.4 | *Grievance Mechanism in place prior to appraisal, to be updated and maintained throughout the Project implementation.* | MBSSE/ FREE Education Project Secretariat and grievance committee. Cost is covered by the project | Continuously throughout project duration |
| 10.4 | ***Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project*** | None |  |  |
| **Capacity Support**  |
| **Specify Training to be provided** | **Specify Targeted Groups and Timeframe for Delivery** | **Specify Training Completed** |
| Contractor Training may be required in:* Stakeholder engagement
* Subproject Environmental and Social screening
* Specific aspects of environmental and social assessment
* Occupational Health and Safety
* Emergency preparedness and response
* Community health and safety
* Monitoring and Reporting
* Gender-Based Violence Risk Mitigation
* Disability inclusion training
* GRM
* Waste management (domestic solid wastes and sewage)
* Documentation and reporting
* Labor management procedures
 | MBSSE, District Engineers and Environmental Health Officers, SMCs, Project Consultants, Contractors and workers. this will be done before commencement of civil works. | World Bank ESFCommunity Entry and MobilizationHandling Grievances Basic Health and Safety Procedures Environmental and Social Reporting  |
| Training for community people shall include:* Traffic safety and Road signage
* Grievance redress and conflict resolution
* Environmental, social and safety impacts of the project and their mitigation
* Community Health and Safety
* GBV and child protection
* All trainings cost will be costed as part of project and contractor costs as appropriate.
 | Regional and district representatives, a cross section of chiefdom and community people | Training shall commence at project implementation |