

Public Disclosure Authorized

REPUBLIC OF CÔTE D'IVOIRE

Union-Discipline-Work



**MINISTRY OF NATIONAL EDUCATION
AND LITERACY**

Strengthening Primary Education System Program

P177800

Draft for negotiations

**ENVIRONNEMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

October 31, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the Republic of Côte d'Ivoire (the "Recipient") will implement the Investment Project Financing component of the Strengthening Primary Education System Program (the "Project") with the involvement of the Ministry of Education and Literacy (MENA), as set out in the Financing Agreement. The International Development Association (the "Association"), has agreed to provide financing for the Project, as set out in the referred agreement(s).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of National Education and Literacy and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient represented by the Minister of National Education and Literacy. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTS</p> <p>The Recipient shall 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 : (i) the implementation of the ESCP; (ii) status of preparation and implementation of E&S instruments required under the ESCP, (iii) stakeholder engagement activities, and the functioning of the grievance mechanism(s) for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH); (iv) cases of SEA/SH and violence against children; and (v) occupational health and safety (OHS).</p>	<p>Quarterly and annual reports, prepared throughout Project implementation, commencing no later than 3 months after the Effective Date.</p> <p>Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Project Implementation Unit (PIU) / National Education and Literacy Program Coordination Office (BCPENA)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The Recipient shall promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse impact on the environment, the affected communities, the public or Project workers. These incidents or accidents may be related to: discrimination (e.g., discrimination against women, young people, people with disabilities, minority groups, migrant populations from other parts of the country or from abroad), exclusion of vulnerable or disadvantaged individuals or groups, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, working conditions, child labor, forced labor, handling of Project-related complaints, etc.</p> <p>The Recipient shall provide the Association with sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm or oversight entity, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident, and no later than 24 hours for severe incidents including fatalities and SEA/SH allegations.</p> <p>A subsequent report will be prepared and provided to the Association within a maximum of 5 working days.</p> <p>This systematic reporting system shall remain in place throughout the Project implementation.</p> <p>Ensure the provision of assistance to survivors of SEA/SH for medical care, psychosocial support, and legal assistance by way of referral to relevant SEA/SH service providers in the Project area within 48 hours.</p>	<p>PIU/BCPENA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		The reporting of SEA / SH cases shall be based on the principle of confidentiality and security of the survivor's identity and shall be kept in a secure location with limited access.	
ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURES:</p> <p>The Recipient shall establish and maintain a Project Implementation Unit within the National Education and Literacy Program Coordination Office (BCPENA) of MENA, with qualified staff and sufficient resources to support management of ESHS risks and impacts of the Project, including an environmental specialist, a social specialist, and a gender specialist (including SEA/SH and stakeholder engagement aspects) to ensure the implementation of E&S documents prepared under the Project.</p> <p>The qualifications, experience, and terms of reference for the recruitment of all these E&S specialists shall be approved by the Association.</p>	The PIU under the BCPENA shall be in place prior to the Project Effective Date and be maintained, along with environmental and social specialists and GBV specialist supporting the current Education Services Delivery Enhancement Project (ESDEP - P163218), throughout project implementation	<ul style="list-style-type: none"> - MENA - PIU/BCPENA
1.2	<p>ENVIRONNEMENTAL AND SOCIAL INSTRUMENTS</p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the following risk and impact assessment and management tools and instruments in accordance with the ESSs and in a manner acceptable to the Association:</p> <ol style="list-style-type: none"> 1. Stakeholder Engagement Plan (SEP), including the Grievance Mechanism (GM) at Project level; 2. SEA/SH Prevention and Management Action Plan <p>This ESCP includes ESS2 principles</p>	<ol style="list-style-type: none"> 1. The SEP shall be developed and disclosed prior to the Project Appraisal. 2. The SEA/SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date. Adopt and disclose these procedures no later than 30 days after project effectiveness. All these instruments shall be implemented throughout Project duration. 	PIU/BCPENA
1.3	TECHNICAL ASSISTANCE	Throughout Project implementation	PIU/BCPENA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>The Recipient shall ensure that consultancies, studies (including feasibility studies, if applicable), capacity and skills building, trainings, and any other technical assistance activities under the Project, including the development of preschool and primary school curricula, materials, and teacher professional development guides are carried out in accordance with terms of reference acceptable to the Association and consistent with the ESSs.</p> <p>Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>		
ESS 2 : LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement in the area of project workers procedures that consist of the following requirements:</p> <ul style="list-style-type: none"> • Ensure that Project Workers, as defined under ESS2, i.e. directly engaged by the Borrower or through third-parties to work specifically in relation to the project a (direct and contracted workers) will be hired, promoted and their employment, where needed, terminated based on principles of non-discrimination and equal opportunity, no-harassment, and freedom of association; • Ensure that all Project Workers are provided with information and documentation that is clear and understandable regarding their terms and conditions of employment, their rights under national labor and employment laws (including payment of wages and deductions, periods of rest and leaving, written notice of termination and severance payments, among others) at the beginning of the working relationship or whenever a material change to the terms or conditions of employment occurs. • Ensure the adoption of appropriate occupational health and safety measures, in line with ESS2, at the workplace, which shall consider inter alia an assessment of the potential OHS risks associated with the tasks to be carried out and include mitigation measures, such as protocols for protection against communicable diseases and COVID-19 transmission as issued by the Ministry of Health and the World Bank; • Ensure the adoption of a code of conduct that sets out measures against practices related with sexual harassment, abuse, and exploitation in the workplaces, 	Adopt and disclose these procedures no later than 30 days after project effectiveness and thereafter implement throughout Project implementation.	PIU/BCPENA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	including the dissemination of the referral services available in the country to respond to such behaviors. The Code of conduct will be included in the project operations manual. <ul style="list-style-type: none"> • Prohibit and ban child labor as well as forced labor, per ESS2 requirements and applicable national laws. The minimum age for this project is 18. 		
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS The Recipient shall establish, maintain, and operate a Grievance Mechanism (GM) for Project workers, sensitive to SEA / SH, as described in the project operations manual , and consistent with ESS2 and the applicable national legislation. The Recipient shall ensure that workers who use this GM are not subjected to any form of discrimination or retaliation by employers.	The GM shall be established prior engaging Project workers and thereafter maintained and operated throughout Project implementation.	PIU/BCPENA
ESS 3 : RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
NOT APPLICABLE			
ESS 4 : COMMUNITY HEALTH AND SAFETY			
4.2	COMMUNITY HEALTH AND SAFETY The Recipient shall develop, adopt, and implement an action plan including precautionary measures for the prevention and management of risks related to the spread of COVID-19, to manage this risk during stakeholder consultations and Program implementation.	Three (3) months after the Project Effective Date and throughout Project implementation. The COVID-19 Prevention Action Plan shall be updated as necessary to respond to the contexts of the Project areas.	PIU/BCPENA
4.3	SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARASSMENT RISKS The Recipient shall develop, disclose, consult upon, adopt, and implement the SEA/SH prevention and management action Plan to assess and manage SEA/SH risks referred to in Section 1.2 above.	The SEA/SH prevention and management action plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date, and thereafter the action plan shall be implemented throughout Project implementation.	PIU/BCPENA
ESS 5 : LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
NOT APPLICABLE			
ESS 6 : BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	NOT APPLICABLE		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	NOT APPLICABLE		
ESS 8 : CULTURAL HERITAGE			
	NOT APPLICABLE		
ESS 9 : FINANCIAL INTERMEDIARIES			
	NOT APPLICABLE		
ESS 10 : STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>The Recipient shall prepare, disclose, consult upon, adopt, and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. The Recipient shall recruit a local NGO or a local specialized agency to support the implementation and monitoring of the SEP.</p>	<p>The SEP shall be disclosed and adopt prior to Project Appraisal.</p> <p>SEP shall be implemented throughout Project implementation.</p>	PIU/BCPENA
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>The Recipient shall establish, publicize, maintain, and operate an accessible Grievance Mechanism (GM) to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers in the Project area, all in a safe, confidential, and survivor-centered manner.</p>	<p>The GM shall be established prior to the Project Effective Date.</p> <p>The GM shall be maintained and operated throughout Project implementation.</p>	PIU/BCPENA with the support of other Psycho-social and legal assistance centers (GBV service providers) hired by the Project if necessary

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The GM shall be supported by a communication plan to ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.		
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Environmental and social standards training:</p> <ul style="list-style-type: none"> - ESS 1: Assessment and management of environmental and social risks and impacts - ESS 2: Labor and working conditions and the Labor Management Procedures (LMP) - ESS 3: Resource Efficiency and Pollution Prevention and Management - ESS 4: Community Health and Safety, and the SEA/SH prevention and management plan - ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement - ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources - ESS 8: Cultural heritage - ESS 10: Stakeholder Engagement and Information Disclosure and the Stakeholder Engagement Plan (SEP) <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> - Project Steering Committee - PIU/BCPENA (social specialist, environmental specialist, gender/SEA/SH specialist, procurement specialist) - MENA central and regional directions - NGOs working in the environmental and social fields in the Project areas - Technical structures - National Environment Agency (ANDE) - Relevant territorial authorities 	Three (3) months after the recruitment of the environmental, social and gender specialists/EAS/HS and once every six (6) months throughout Project implementation	PIU/BCPENA with the support of other consultants/Training Centers hired by the Project if necessary.
CS2	<p>Training on labor and working conditions:</p> <ul style="list-style-type: none"> - Conditions of employment under national labor laws; - Code of conduct for suppliers/ service providers and subcontractors; - Workers' organizations; 	Prior to the start of employment for both newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.	PIU/BCPENA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> - Rules on child labor and minimum working age; - Workers' rights ; - Worker complaints and related SEA / SH complaints; - Discrimination and harassment, SEA / SH incidence in the workplace. <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> - Workers of service providers - NGOs working in the social field of the Project area. 		
CS3	<p>Training on the grievance mechanism The training shall cover the following modules:</p> <ul style="list-style-type: none"> - Registration and processing procedure ; - Complaint's Resolution Procedure; - Documentation and handling of complaints; - Use of the procedure by various stakeholders; - SEA/SH complaints <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"> - PIU/BCPENA (social specialist, environmental specialist, gender/SEA/SH specialist, procurement specialist) - Local or regional monitoring committees or grievance management committees - Local community representatives - Relevant technical structures - Relevant local governments - NGOs working in the social field in the Project area. 	<p>Prior to the start of employment for both newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p>	PIU/BCPENA
CS4	<p>SEA/SH Risk Training</p> <ul style="list-style-type: none"> - Awareness, prevention, and mitigation of SEA/SH risk - Topics, activities, and target audiences shall be defined in the SEA/SH Action Plan; - Dissemination of the SEA/SH Action Plan (activities, target groups); - Addressing SEA/SH complaints <p>The training shall target the following actors:</p>	<p>Prior to the start of employment for newly recruited workers and those already working, training would be provided quarterly to ensure that all staff, actors, and stakeholders involved are trained.</p>	PIU/BCPENA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> - BCPENA (social specialist, environmental specialist, gender/SEA/SH specialist, procurement specialist); - Relevant central and local technical structures; - ANDE ; - Authorities and local communities concerned; - NGOs working in the social field in the Project area. 		
CS5	<p>Information/awareness on potential environmental and social risks targeting local populations/communities: Information / awareness on potential environmental and social risks, including the Project SEA / SH, to elicit their commitment and participation in the identification of measures aimed at minimizing and mitigating negative environmental and social risks and impacts related to Project implementation.</p>	Before the start of the works (studies and consultations, etc.) and throughout Project implementation.	PIU/BCPENA