

**Government of São Tomé & Príncipe**

**Ministry of Education**

**The Girls Empowerment and Quality Education  
for All Project (P169222)**

**Draft**

**ENVIRONMENTAL and SOCIAL  
COMMITMENT PLAN (ESCP)**

**January, 8, 2020**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of São Tomé and Príncipe will implement the Girls Empowerment and Quality Education for All Project with the involvement of the Ministry of Education (MoE), Ministry of Finance (MoF), Ministry of Public Works (MoPW) and Project Supporting Fiduciary Agency. The International Development Association (IDA), hereinafter the Association, has agreed to provide financing for the Project.
2. The Government of São Tomé and Príncipe 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 Government of São Tomé and Príncipe 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), Resettlement Action Plans (RAP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents. All of these E&S documents must include an assessment of the underlying gender-based violence (GBV) risks and social situation, using the GBV risk assessment tool to provide guidance and keeping to safety and ethical considerations related to GBV data collection. This includes ensuring that the team member responsible for all social evaluations/risk assessments has GBV expertise. GBV risks need to be adequately reflected in all environmental and social risk instruments (i.e., Project ESMP, C-ESMP) inclusive of a mapping of GBV prevention and response actors in project adjoining communities. This should incorporate an assessment of the capabilities of the service providers to provide quality survivor centered services including GBV case management, acting as a survivor advocate, providing referral services to link to other services not provided by the organization itself. Finally, the Government of São Tomé and Príncipe will be responsible for including a GBV Action plan, including the Accountability and Response Framework, as part of the ESMP and ensuring that the accompanying mitigation measures are reflected in contractors' C-ESMP.
4. The Government of São Tomé and Príncipe 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 Government of São Tomé and Príncipe 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 Government of São Tomé and Príncipe, 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 Government of São Tomé and Príncipe 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 Government of São Tomé and Príncipe. The Government of São Tomé and Príncipe 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 Government of São Tomé and Príncipe shall provide

additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include mapping the availability of services and referral pathways for survivors, ensuring the availability of an effective grievance redress mechanism (GRM) with multiple channels to initiate a complaint with specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases (given the context of this project, the project should consider a parallel GRM outside of the project GRM is warranted), ensuring Codes of Conduct (CoC) are developed, signed, and all teachers and project staff receive continuous training on the CoC, ensuring a clear Accountability and response framework for those that breach the CoC, including a well-trained guidance counselor (female if possible) at school sites that can enable disclosure and safe referral to services, including Sexual Exploitation and Abuse/Sexual Harassment in teacher, school director, and inspector training programs, and ensuring separate WASH facilities for women/men, boys/girls.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit regular monitoring reports on the activities and performance of the environmental, social, health and safety (ESHS) commitments and performance on the project, including the implementation of the ESCP, stakeholder engagement activities, and the functioning of the approved grievance mechanism in accordance with legal agreement, including the requirements of ESCP, and ESSs.</p>	<p>Every six months, throughout project implementation</p>	<p>MoE/ PIU</p> <p>The monitoring costs will be incorporated in the overall project management costs.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <ul style="list-style-type: none"> <li>Notify within 48 hours any incident or accident related to the project or that has an impact on it, and that has or could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example: occupational accidents that could result in death or serious injury; falls and vehicle accidents; cases of gender-based violence or violence against minors.</li> <li>For GBV related-incidents, the survivor should be referred immediately to services (at the same time this is reported to the project team and World Bank: within 48 hours) following a survivor-centered protocol to be developed in the aforementioned GBV-adapted GRM.</li> <li>Provide sufficient details regarding the incident or accident, and indicate immediate measures taken to address it. Note that for GBV incidents, confidentiality should be ensured for the survivor and accused with no identifying information for either provided (i.e. include date of incident, GBV form, general description of survivor such as age/gender, general description of accused such as age/gender/where work, if incident is linked to the project in the survivor’s own words, what services the survivor was referred to/what s/he accepted, if the perpetrator signed a CoC and sanctions taken against him/her).</li> <li>A report of the incident shall be submitted, detailing summary findings of the Root Cause Analysis (RCA).</li> <li>An incident register shall be maintained at all construction sites, throughout the duration of the works.</li> </ul>	<p>Notify the Association within 48 hours of learning about the incident or accident, in line with the World Bank’s Environment and Social Incidence Response Toolkit (ESIRT).</p> <p>An incident and accident report would be provided by the Government of STP within a time frame acceptable to the Association, as requested.</p> <p>Maintained throughout Project implementation.</p>	<p>Contractor/sub-contractors; supervisor MoE/ PIU</p> <p>Implementation funding to be part of the ESMPs budgets (inclusive of costs to ensure services for survivors/complaints/grievances of GBV).</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>In case contractors and sub-contractors are hired for the Project activities or sub-activities, PIU will require such contactors/sub-contractors to submit monthly monitoring reports to the PIU regarding ESHS performance of the contracted work. The Borrower upon request would submit such monthly monitoring reports to the Bank.</p>	<p>Monthly reporting for contracted work(s) throughout contract/sub-contract period.</p>	<p>Contractor(s)/Sub-contractor(s).</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The MoE will be responsible for the overall implementation of project activities. The MoE will work closely with the Ministry of Finance and AFAP, on project implementation and monitoring and Ministry of Public Works during execution. A PIU shall be established under the MoE and will appoint and maintain an environmental and social specialist (E&amp;S).</p> <p>Additionally, once project is under implementation, the PIU shall hire short term consultants to support project’s implementation and supervision. This includes the need to engage at least on a punctual basis GBV experts as part of social assessment/evaluation teams to adequately assess and ensure continued monitoring of project-related GBV risks.</p>	<p>E&amp;S Specialist shall be hired or appointed after project effectiveness.</p> <p>Short-term consultants shall be in place two months before commencement of the project and to be maintained as necessary throughout Project implementation.</p>	<p>MoE/ PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>The PIU’s Project Coordinator shall ensure E&amp;S specialist shall be responsible for (not limited to):                      the disclosure of the environmental and social instruments (ESMF, LMP, ESMP’s, etc.); implement and maintain a functional grievance-redress mechanism; constantly engage with project’s stakeholders; conduct the screening activities prior to the commencement of civil works; work in collaboration with the Directorate General of Environment on the monitoring of mitigation measures of the activities under implementation; ensure the inclusion of E&amp;S aspects into the bidding documents; preparation of trimestral reports; and incorporate E&amp;S aspects into the operational manual <sup>1</sup>.</p>		

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<sup>1</sup> For GBV the assessment should include understanding and addressing issues related to: Cultural, gender, and social norms and practices, particularly those which are harmful to women and girls and that would be exacerbated as a result of project implementation. This includes power dynamics, division of labor and participation in decision-making processes in both professional and private spheres; Existing data regarding Gender-based Violence (GBV), including data on partner/non-partner sexual violence and physical violence, Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), intimate partner violence, family violence, early marriage, and harmful traditional practices, especially those particularly at risk of being exacerbated by project implementation. Availability and accessibility of safe and ethical GBV response services, including medical care, psychosocial services, legal aid, protection services and livelihood opportunities; Data regarding access to employment, educational and economic opportunities for traditionally marginalized populations, especially women and girls; A summary of labour and working conditions, including the risk of SEA/SH and other forms of abuse.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>MoE/PIU shall prepare and implement the following instruments:</p> <ul style="list-style-type: none"> <li>• Environmental and Social Management Framework (ESMF);</li> <li>• Stakeholder Engagement Plan (SEP);</li> <li>• Labor Management Procedures (LMPs).</li> </ul> <p>All subprojects associated with the rehabilitation/construction of toilet facilities, water points etc.) must be systematically screened from both environment and social standpoint including ensuring adequate consideration of gender and mitigation of GBV-related risks.</p>	<ul style="list-style-type: none"> <li>• SEP to be prepared, consulted and disclosed, including draft GRM before Appraisal;</li> <li>• ESMF to be prepared, consulted and disclosed after Board Approval</li> <li>• LMP to be prepared and disclosed after Board approval</li> </ul>	MoE/ PIU
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <ul style="list-style-type: none"> <li>• Develop and implement Environmental and Social Management Plans (ESMPs) in accordance with the ESMF;</li> <li>• Develop and implement LMPs, including an Occupational Health and Safety (OHS) management plan;</li> <li>• Develop and implement a screening tool for all subprojects, which will be conducted and cleared prior to commencement of the subproject.</li> </ul> <p>All of these plans need to include the Codes of Conduct that address Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) risks (inclusive of: ensure requirements in CoCs are clearly understood by those signing; Have CoCs signed by all those with a physical presence at the project site; Train project-related staff on the behavior obligations under the CoCs; Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.).</p>	Instruments to be prepared prior to the commencement of subprojects and implemented throughout project's implementation.	MoE/ PIU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>MoE shall ensure that the Contractor ToR's and bidding documents include environmental and social requirements (including CoCs, including on GBV and child protection; reports; monitoring and GRM);</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the LMPs, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>MoE shall also ensure that Contractors and subcontractors prepare and implement the following:</p> <ul style="list-style-type: none"> <li>• Construction-Environmental and Social Management Plan (C-ESMP). A GBV risk assessment and mitigation measures need to be included in the C-EMSP;</li> <li>• OHS Plan.</li> </ul> <p>The procurement documents should set out clearly how adequate GBV costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined GBV activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers, if necessary)</p>	<p>Prior to the preparation of procurement document and supervise contractors throughout Project implementation.</p>	<p>MoE/ PIU</p>
1.5.	<p><b>PERMIT, CONSENTS AND AUTHORIZATIONS:</b></p> <p>Obtain, the permits, consents and authorizations that are applicable to the Project from relevant national authorities. The permits to be issued are:</p> <ul style="list-style-type: none"> <li>• Environmental license</li> <li>• Construction license</li> </ul>	<p>The Environmental and construction license need to be obtained prior to commencement of civil works.</p>	<p>MoE/ PIU (The E&amp;S focal point)</p>
<p><b>ESS 2: LABOR AND WORKING CONDITIONS</b></p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b> Prepare and implement Labor Management Procedures (LMP) including Occupational Health and Safety (OHS) measures and grievance mechanism.</p>	LMP to be finalized after Board Approval and implemented throughout project's implementation.	MoE/ PIU (The E&S focal point)
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The project should consider a parallel GRM for GBV related complaints to ensure fast, effective, safe, ethical, and survivor-centered responses to GBV grievances.</p>	Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	MoE/ PIU (The E&S focal point)
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> MoE shall ensure that Contractors prepare and implement an OHS plan. The OHS plan shall include:</p> <ul style="list-style-type: none"> <li>• Identification of potential hazards to project workers, particularly those that may be life-threatening;</li> <li>• Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;</li> <li>• Training of project workers and maintenance of training records; Documentation and reporting of occupational accidents, diseases and incidents;</li> <li>• Emergency prevention, preparedness and response arrangements.</li> <li>• These measures should be inclusive of measures to mitigate risks of GBV such as having separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. Visibly displaying signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited. As appropriate, public spaces around the project grounds should be well-lit.</li> </ul>	Preparation of OHS plan to be prior to commencement of civil works.	MoE/ PIU (The E&S focal point)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> MoE shall ensure that Contractors/Subcontractors prepare and implement measures for improving efficiency in consumption of water, as well as other resources and material inputs. Resource efficiency and pollution prevention and management measures will be covered under the ESMF to be prepared under action 1.2 above.</p>	<p>Measures shall be included in the ESMF and the C-ESMP. C-ESMP to be prepared prior to commencement of works.</p>	<p>MoE/ PIU (The E&amp;S focal point) Contractors</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b> The potential traffic and road safety risks to workers and potentially affected communities throughout the project life-cycle will be identified, evaluated and monitored  The appropriate measures and plans will be identified, developed and implemented to address potential traffic and roads safety risks, including appropriate training to workers on driver and vehicle safety.  The regular maintenance of project vehicles will be ensured.</p>	<p>Prior to commencement of construction and maintain during the project timeline</p>	<p>MoE/ PIU (The E&amp;S focal point) Contractors</p>
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b> Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.  Community Exposure to disease namely water borne diseases, vector borne diseases and communicable diseases will be avoided or mitigated taking into consideration higher sensitivity of vulnerable groups.</p>	<p>Measures shall be included in the ESMF and the C-ESMP. C-ESMP to be prepared prior to commencement of works.</p>	<p>MoE/ PIU (The E&amp;S focal point) Contractors</p>

4.3	<p><b>GBV AND SEA RISKS:</b> Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan) including the Accountability and Response Framework as part of the ESMP. The contractor/consultant’s response to these requirements will be required to be reflected in their C-ESMP. The GBV action plan should assess and propose measures to manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).</p>	<p>Submit the GBV 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</p>	
4.4	<p><b>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</b> GBV mitigation measures should be implemented to address identified GBV risks. At the project level, this should include hiring well-trained guidance counselors (female if possible) to ensure disclosure and safe referral to services, clear and enforced CoCs signed by all project staff, teachers, and school staff, clear Accountability and response frameworks for breaches of CoCs, training on CoCs for school personnel, teachers, and students including how to safely and confidentially report cases, an accessible GRM for parents, teachers, students, and school staff, mapping of services for survivors for referrals, separate quality WASH facilities for men/women, boys/girls. Funding must be available for IA to recruit GBV Services Providers to facilitate access to timely, safe and confidential services for survivors (including money for transportation, documentation fees, and lodging if needed).</p>		
4.4	<p><b>SECURITY PERSONNEL:</b> Not applied</p>		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANS:</b> Not applicable</p>		
5.2	<p><b>GRIEVANCE MECHANISM:</b> Not applicable</p>		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b> Not applicable</p>		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES PLAN:</b> Not applicable</p>		

7.2	<b>GRIEVANCE MECHANISM:</b> Not applicable		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS:</b> Prepare, adopt, and implement the chance finds procedure described in the ESMF and subsequent ESMPs developed for the Project in case valuable artefacts or culturally valuable materials are found. Chance finds procedures will be part of all contracts involving any works under the project.	Prior to the commencement and maintain during construction	MoE/ PIU (The E&S focal point) Contractors
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	<b>ESMS:</b> Not applicable		
9.2	<b>FI ORGANIZATIONAL CAPACITY:</b> Not applicable		
9.3	<b>SENIOR MANAGEMENT REPRESENTATIVE:</b> Not applicable		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> A Stakeholder Engagement Plan (SEP) has been prepared, consulted upon and disclosed.	SEP has been finalized before Appraisal and will be implemented throughout the project's life	
10.2	<b>PROJECT GRIEVANCE MECHANISM:</b> Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.	GRM's design has to be finalized prior to Appraisal and functional till three months after Project effectiveness	
<b>CAPACITY SUPPORT (TRAINING)</b>			
	<b>Specify Training to be provided</b>	<b>Specify Targeted Groups and Timeframe for Delivery</b>	<b>Specify Training Completed</b>
	Grievance Mechanism	PIU staff and consultants including E&S Specialist stakeholders, communities, Project workers	At the beginning and during project implementation
	Stakeholder engagement	PIU staff an consultants including E&S Specialist, stakeholders, communities, Project workers	In the start phase and during project implementation
	Specific aspects of environmental and social assessment	PIU staff an consultants including E&S Specialist, stakeholders, communities, Project workers	In the start phase and during project implementation

	Labour influx, including Gender-based violence and sexual exploitation and abuse	PIU staff an consultants including E&S Specialist, stakeholders, communities, Project workers	In the start phase and during project implementation
	Community health and safety	PIU staff an consultants including E&S Specialist, stakeholders, communities, Project workers	In the start phase and during project implementation
	Environmental Awareness	All workers and project staff	Continuous throughout the project timeline
	Environmental and Social Framework (specific to the ESS's that apply to the project)	Environment and Social safeguards specialists	Continuous throughout the project timeline
	Emergency preparedness and response	Site Engineers and Project Manager, E&S Specialist	A month prior the project commencement
	Environment and social monitoring and reporting	PIU consultants including Environment and Social safeguards specialists	Continuous throughout the project timeline