

Directorate of Primary Education (DPE)  
Ministry of Primary and Mass Education (MOPME)

**COVID-19 School Sector Response Project (GPE)**

**DRAFT**

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

**July 16, 2020**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. People's Republic of Bangladesh (GoB) (hereinafter **the GOB**) will implement the COVID-19 School Sector Response Project (the **Project**), with the involvement of Directorate of Primary Education (DPE) under Ministry of Primary and Mass Education (**MOPME**) as the lead implementing agency in collaboration with Directorate of Secondary and Higher Education (DSHE) under Ministry of Education (**MOE**) who will work in close cooperation with the DPE. The International Development Association (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. **The GOB** 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 GOB** is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the MoHFW referenced in 1 above.
4. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the **Bank** by the **GOB** as required by the ESCP and the conditions of the legal agreement, and the **Bank** will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the **Bank** and **the GOB**, 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 **GOB** will agree to the changes with the **Bank** 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** and the **GOB**. The **GOB** will promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the **GOB** shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<b>REGULAR REPORTING:</b> Prepare and submit to the <b>Bank</b> regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, but not limited to, stakeholder engagement activities and grievances log.	Half Yearly (every six months) throughout the Project implementation period.	Project Implementation Unit (PIU).
B	<b>INCIDENTS AND ACCIDENTS</b> The PIC will promptly notify the Bank 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 cases of GBV/SEA, serious mismanagement in handling disinfectant related waste, security breach, death/disability or any incident or accident from any activities as would be executed by the Contractor etc. PIC will 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 Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Notify the Bank within 24 hours of learning of the occurrence of such accidents or incidents. A report on action taken to be provided on the same by 07 (Seven) days of notifying the Bank.	PIU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ORGANIZATIONAL STRUCTURE:</b> The Implementing Agency (IA) (Directorate of Primary Education of Ministry of Primary and Mass Education) will recruit an Environmental as well as a Social Specialist in the Project Implementation Unit (PIU), who are responsible for preparing the required environmental and social (E&S) documents as well as addressing environmental and social risks/impacts which include among others: the monitoring of the implementation of all E&S instruments, community health and safety measures, stakeholder engagement and the functioning of the Grievance Redress Mechanism (GRM) etc.	Recruitment will be completed within 45 days of Project effectiveness. The specialists will be retained throughout the implementation of the Project. Until the recruitment, the IA's in house capacity will support the Project's E&S due diligence and other E&S related issues. World Bank teams will also provide interim support.	IA
1.2	<b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS MANAGEMENT TOOLS AND INSTRUMENTS</b>		IA

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>a. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with Environmental and Social Standard-1 (ESS1) and an Environmental and Social Management Framework (ESMF) (including a template for site specific Environmental and Social Management Plan (ESMP)) to be prepared, disclosed and adopted for the Project, including to 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.</p> <p>b. Prepare, disclose, adopt, and implement a Labor Management Procedure (LMP), Small Ethnic Community Planning Framework (SECPF), and any other environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the Environmental and Health Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP) including relevant WHO and Ministry of Health and Family Welfare (MoHFW) Guidelines on COVID-19.</p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHG measures into the ESHS specifications of the procurement documents and contracts with consulting firms. Thereafter ensure that the consulting firms comply with the E&amp;S specifications of their respective contracts.</p>	<p>a. ESMF (including a template of ESMP for schools to be prepared before engaging entity responsible for school disinfecting program. Site specific ESMP to be prepared before carrying out the respective Project activity (communication campaign and school disinfection) as per the ESMF.</p> <p>b. Before engaging entity responsible for school disinfecting program.</p> <p>c. Before initiating the procurement process for the relevant activities and thereafter throughout the implementation of such Project activities.</p>	
<p>1.3 <b>EXCLUSIONS:</b> Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>• Activities that may cause long term, permanent and/or irreversible adverse environmental or social impacts</li> <li>• Activities that may affect lands or rights of indigenous people or other vulnerable minorities,</li> </ul>	<p>During Planning phase of the Project</p>	<p>IA</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<ul style="list-style-type: none"> <li>Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage</li> </ul>		
<p>1.4 <b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures (<b>LMP</b>), into the Environmental, Social, Health and Safety (<b>ESHS</b>) specifications of the respective procurement documents with consulting firms/contractors. Thereafter, ensure that the consulting firms/contractors comply with the ESHS specifications of their respective contracts.</p> <p>Bidding documents and contracts to include relevant measures of the ESMF, including written Codes of Conduct, COVID-19 and other communicable diseases risks with respect to its workers and surrounding communities.</p> <p>Preparation of Contractors-ESMP including Disinfectant and PPE usage and disposal plans, community engagement plan during communication campaign etc.</p>	<p>Prior to issuance of EOI notice for contractors</p> <p>During Bid document preparation</p> <p>Prior to commencement of civil works</p>	<p>IA</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>		
<p>2.1 <b>LABOR MANAGEMENT:</b> The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety (OHS) measures (including emergency preparedness and response measures), ensuring appropriate working conditions, during and post public health emergency (outbreak of COVID-19); provision of training on handling emergency situation especially health related issues; and setting out grievance arrangements for Project workers, and incorporating labor requirements in the procurement documents and contracts with consulting firms/contractors and supervising firms.</p>	<p><b>LMP</b> will be prepared before engaging entity responsible for school disinfecting program and implemented throughout Project implementation. All other ESS2 measures will also be implemented throughout Project implementation.</p>	<p>IA and Consulting firms/Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	The IA will be required to develop and follow a Labor Management Procedures (LMP).		
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p>Relevant aspects of this standard shall be considered including measures to manage waste related to transportation/ storage and usage and final disposal and cleaning of disinfecting equipment and PPEs. The IA will ensure approved protocol and practice to store, transport, use and disposal of disinfectants and PPEs. The chemical used for disinfection will also need to be selected from approved list of government/WHO or any other relevant international organizations or in absence of such approved list need to be vetted by Ministry of Health and Family Welfare (MoHFW).</p> <p>The Borrower will ensure the Firm/ Service Provider assigned for disinfection works has adequate experience, personnel and resources to carryout disinfection activities following Good International Industry Practice/ approved protocol</p>	An Environmental and Social Management Framework (ESMF) will be developed before engaging entity responsible for school disinfecting program that will include measures and protocol to address this issue.	IA
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p>Relevant aspects of this standard shall be considered including, inter alia, measures to minimize the potential for community exposure to disinfecting chemicals and disposed PPEs; to ensure that community is safe from potential wastes emanating from PPEs and disinfectants including their transportation, storage, use and disposal.</p> <p>The Borrower will put measures in place to prevent or minimize the spread of the infectious disease/COVID-19 to the community and the school children during and post communication campaign and school resumption.</p>	An ESMF will be developed before engaging entity responsible for school disinfecting program as above	IA
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	Not currently considered relevant.	NA	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	Not currently considered relevant.	NA	
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	Project activities affecting small ethnic communities/IPs will be implemented in a culturally sensitive manner in accordance with the provisions of ESS7. A Small Ethnic Community Planning Framework (SECPF) will be developed addressing issues related to small ethnic communities/IPs meeting the criteria of ESS7 and their special circumstances such as language, cultural norms and values.	A SECPF will be prepared within 45 days of Project effectiveness	IA
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	Not currently considered relevant	NA	
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not relevant.	NA	
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN:</b> Prepare, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Bank.	A draft SEP has been prepared and will be disclosed before Appraisal. The SEP will be updated every six months and implemented throughout Project implementation.	IA
10.2	<b>GRIEVANCE MECHANISM:</b> Accessible grievance arrangements through a Grievance Redress Mechanism (GRM) using multiple channels shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.	Throughout Project implementation	IA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>CAPACITY SUPPORT (TRAINING)</b>			
	<p>Training topics will among others include (for IA/PIU Officials, administrative and operational personnel, Communication personnel and Disinfectant personnel and Contractors)</p> <ul style="list-style-type: none"> <li>• Use and disposal of disinfectants and PPE (<b>for Communication and Disinfectant Workers and Contractors</b>)</li> <li>• Working in COVID-19 environment (<b>for all</b>)</li> <li>• Risk communication, prevention and community engagement (<b>Administrative, operational personnel and communication campaign workers</b>)</li> <li>• WHO and Ministry of Health and Family Welfare (MoHFW) guidelines on quarantine and social distancing (<b>for all</b>)</li> <li>• Environmental and Social Framework (ESF) with special emphasis on Labor, Gender-Based Violence (GBV) and Community Health and Safety Issues (<b>for all</b>)</li> </ul>	<p>First – within 45 days of Project Implementation Thereafter every six months</p>	IA