

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

SIERRA LEONE FREE EDUCATION PROJECT

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

June 20, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (the Recipient) is implementing FREE Education Project (the Project), with the involvement of the Ministry of Basic and Secondary School Education (MBSSE), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the Original Financing (P167897) and Additional Financing (P178704) for the Project, as set out in the referred agreement. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the Original Financing and the Additional Financing for the Project referred to above.
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.
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 support, 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 as 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 Minister of MBSSE, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's authorized representative. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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, the status of preparation and implementation of E&S instruments required under the ESCP (including, inter alia, the Environmental and Social Management Plan (ESMP), Labor Management Procedures (LMP), Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) Action Plan), stakeholder engagement activities, functioning of the grievance mechanisms.</p> <p>An Environmental and Social Management and Reporting System (ESMRS) using digital tools shall be established to coordinate E&S reporting for all sub-project</p>	<p>Quarterly reporting to the Association is ongoing for the parent project and will be extended to cover the Additional Financing throughout project implementation. Each report shall be submitted to the Association no later than five (5) days after the end of each reporting period.</p> <p>Maintain ES reporting system throughout project implementation.</p>	<i>FEPs/MBSSE</i>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. Provide 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, 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.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	<i>FEPs/MBSSE</i>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and Clerk of works to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p> <p>Conduct annual E&S audit of civil works by a third party.</p>	<p>Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.</p> <p>Annually throughout project implementation</p>	<p><i>FEPs/Clerk of works/ Contractor</i></p> <p><i>FEPs/MBSSE</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>Maintain the existing Free Education Secretariat (FEPs) at MBSSE with the qualified Environmental Specialist and Social and Gender Specialist to support the management of E&S risks for both the parent project and AF.</p> <p>The FEPs have recruited and shall maintain the 18 Clerks of Works positions to support construction supervision.</p> <p>Additionally, the E&S Specialists at the national level in FEPs shall be supported by Environment and Social Officers (ESOs) at the Local Councils to implement the project.</p>	<ul style="list-style-type: none"> a. The Project has staffed the required E&S specialists. These positions shall be maintained throughout Project implementation. b. The Clerks of Works have been recruited and these positions will be maintained throughout the constructions. c. MOU with Local councils on the terms of engagement with the project will be approved by June 15, 2023. Thereafter, ESOs will be supporting E&S supervision throughout project implementation. 	<p><i>FEPs/MBSSE</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ul style="list-style-type: none"> a. Update the existing ESMF to include risk assessment and management measures supported under the additional financing. Thereafter, disclose, consult upon, and implement the updated ESMF, consistent with the relevant ESSs. b. Prepare and update as relevant, disclose, consult upon, adopt and implement an Environmental and Social Impact Assessment (ESIA), and/or Environmental and Social Management Plan (ESMP) for infrastructure/works under Component 3 of the Project for which the ESIA/ESMP is required, consistent with the relevant ESSs. c. Cause other implementing entities such as the ministry of health and the NGO consortium to adopt and implement requirements of the ESCP including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and the SEA/SH Action Plan into their contracts. Thereafter ensure that these entities comply with the ES requirement of their respective contracts. d. Secure environmental permits for all new construction and rehabilitation under the Project. 	<ul style="list-style-type: none"> a. The ESMF of the Original Financing project was prepared and disclosed on June 7, 2019. This ESMF shall be updated and redisclosed within 1 month after the Effective Date of the Additional Financing. The Recipient shall implement the updated ESMF throughout Project implementation. b. Prepare and update as relevant, disclose, consult upon, adopt the ESIA and or ESMP prior to initiation of construction activities, and thereafter implement the ESIA and or ESMP throughout Project implementation. c. As part of respective entities contract thereafter supervise implementation throughout project implementation. d. Secure environmental permits prior to initiation of construction. Thereafter, abide by the terms of permits throughout project implementation 	<p><i>FEPs/MBSSE</i></p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	<p><i>FEPs/MBSSE/ contractors</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and the code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> <p>Contractors will submit C-ESMPs prior to the start of the construction works for the approval of FPEs</p>	Before the commencement of the construction activities.	
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	FEPs/MBSSE
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update the existing Labor Management Procedures (LMP) annexed to the ESMF of the parent project and implement the LMP, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	An LMP prepared and disclosed as part of the ESMF of the Original Financing on (June 7, 2019) shall be updated and redisclosed within 1 month after the Effective Date of the Additional Financing and implemented throughout Project implementation.	FEPs/MBSSE/ Contractors
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Maintain worker's grievance mechanism and operate it throughout Project implementation.	FEPs/MBSSE
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>a. Prepare, adopt and implement a Waste Management Plan (WMP) as part of contractor ESMP, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	a. same timeframe for the adoption and implementation of the C-ESMP.	FEPs/MBSSE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b. The ESMF shall be updated to reflect risk management of activities specifically supported under the AF, in particular, those related to use and disposal of first aid kits in schools.</p>	<p>b. Same timeframe as for the adoption and implementation of the updated ESMF under action 1.2 above.</p>	
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	<p>Same timeframe as for the adoption and implementation of the ESMP.</p>	<p>FEPs/MBSSE</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p>	<p>Same timeframe as for the adoption and implementation of the ESMP.</p>	<p>FEPs/MBSSE</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, accidents and pollution, sexual exploitation and abuse, sexual harassment, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	<p>Same timeframe as for the adoption and implementation of the ESMPs.</p>	<p>FEPs/MBSSE</p>
4.3	<p>SEA AND SH RISKS</p> <p>a. Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.</p> <p>b. A service provider has been hired to support the SEA/SH prevention and response efforts and shall be maintained for the AF.</p> <p>c. Train Project workers and conduct stakeholder sensitization activities on Project activities and relevant SEA/SH mitigation processes.</p> <p>d. Undertake regular monitoring and evaluation of progress on SEA/SH measures, including reassessment of risks as appropriate.</p>	<p>a. The SEA/SH Action Plan has been prepared and shall be updated and disclosed one month after effectiveness of the Additional Financing, and thereafter implemented throughout Project implementation.</p> <p>b. Service provider has been recruited and will be maintained for the AF.</p> <p>c. Throughout Project implementation</p> <p>d. Throughout Project implementation</p>	<p>FEPs/MBSSE</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	e. Contractors shall adopt the Project SEA/SH Action Plan as part of Contractor ESMP and shall implement these provisions. The Recipient shall supervise contractors throughout Project implementation.	e. Contractors shall adopt the Project SEA/SH as part of the C-ESMP prior to the recruitment of contractor workers. Supervision of contractors throughout Project implementation.	
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities. Such measures are reflected in the ESMP and shall be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	FEPs/MBSSE
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK The project has prepared and disclosed a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	The RPF of the Original Financing was prepared and disclosed June 7, 2019) and shall be implemented throughout Project implementation.	FEPs/MBSSE
5.2	RESETTLEMENT PLANS Prepare, disclose, consult upon, adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.	Prepare, disclose, consult upon, and adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.	FEPs/MBSSE
5.3	GRIEVANCE MECHANISM The grievance mechanism (GM) to address the Project including resettlement-related complaints shall be described in the RPF, RAPs and SEP.	Operationalize the GM prior to initiating the RAP process.	FEPs/MBSSE
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS	Screen for Biodiversity risk prior to initiation of any sub-project.	FEPs/MBSSE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The ESMF includes a procedure for screening biodiversity risks and impacts. In the unlikely event, that significant biodiversity risk is observed from the screening, the site shall be declared ineligible for construction.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant.		
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Describe and implement the chance finds procedures as part of the ESMF of the Project.	The chance find procedures are already described in the ESMF for the original financing. Implement these procedures throughout Project implementation.	FEPs/MBSSE
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 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 that is free of manipulation, interference, coercion, discrimination and intimidation.	The SEP of the Original Financing was prepared and disclosed (June 7, 2019). It was updated and redisclosed for the first additional financing on September 11, 2020. The SEP shall further be updated for the second additional financing prior to project appraisal and be implemented throughout Project implementation.	FEPs/MBSSE
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism to receive and facilitate the 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. The GRM will incorporate digital platforms for grievance recording, tracking and reporting.	Project GRM has been established for the original financing. This shall be maintained for the AF and operated throughout Project implementation.	FEPs/MBSSE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism 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, all in a safe, confidential, and survivor-centered manner.		
CAPACITY SUPPORT			
CS1	<p>The following types of training will be provided to the relevant target groups, such as project staff, stakeholder community, project workers, consultants, contractors, and sub-contractors:</p> <ul style="list-style-type: none"> • E&S screening • Preparatin and implementation of ESMPs • E&S management of construction impacts • stakeholder mapping and engagement • emergency preparedness and response • community health and safety. • GBV/SEA/SH awareness, prevention, reporting and management protocols • Social inclusion • Labor and Management Procedure • Occupational Health and Safety • Waste management (domestic solid wastes and sewage) • School Health Management Training • Contractor management • Additional training that will be identified during implementation. 	<i>Quarterly and as needed throughout Project implementation</i>	<i>FEPs/MBSSE</i>
CS2	Conduct training for Project workers on Labor and working conditions, health and safety, incident and accident report	Quarterly and as needed throughout Project implementation	<i>FEPs/MBSSE</i>