



وزارة المالية

**The Palestine Liberation Organization (for the benefit of The
Palestinian Authority)**

**Palestinian Emergency Financing Facility
(P504704)**

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

Negotiation version

February 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Palestinian Liberation Organization (for the benefit of the Palestinian Authority, namely the Ministry of Finance) (hereinafter the “Recipient”) will implement the Palestinian Emergency Financing Facility Project (the Project). The Directorate General of International Relations and Projects (DGIRP) will be the Project Implementation Unit (PIU) for the project and will oversee project implementation, monitor progress, and ensure prompt delivery and reporting on project indicators. The International Development Association hereinafter (the Association), acting as the administrator of the Trust Fund for Gaza and West Bank, has agreed to provide the original financing (P504704) for the Project, as set out in the referred agreement.
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 Grant 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, 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 and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.
5. If 60 days prior to the Closing Date, the World Bank determines that there are measures and actions specified in the ESCP which will not be completed by the Closing Date, the Borrower shall: (a) not later than 30 days before the Closing Date, prepare and present to the World Bank, an action plan satisfactory to the World Bank on the outstanding measures and actions, including a timetable and budget allocation for such measures and actions (which action plan shall be deemed to be considered an amendment of the ESCP); and (b) thereafter, carry out said action plan in accordance with its terms and in a manner acceptable to the World Bank.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	REGULAR REPORTING		
	Prepare and submit to the World Bank 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, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.	Submit bi-monthly reports to the Association throughout project implementation, commencing a month after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.	MoF
B	INCIDENTS AND ACCIDENTS		
	<p>Promptly notify the World 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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury.</p> <p>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 reports to the Association within a timeframe acceptable to the Association</p>	MoF
ESS I: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
I.1	ORGANIZATIONAL STRUCTURE		
	MoF shall appoint one of the MoF environmental and social (ES) existing staff as an ES focal point to support the management of ESHS risks and impacts of the Project.	Appoint the ES focal point by the Effective Date and retain said specialist throughout Project implementation.	MoF
I.2	ENVIRONMENT AND SOCIAL ASSESSMENT		
	The environmental and social risks and impacts of the project are assessed as moderate. Identify eligibility criteria to which World Bank financing will be applied. Only Eligible Employees - that is education employees in the West Bank (including staff that work in institutions providing basic, secondary, pre-primary, and vocational education as defined in the Education Sector Strategic Plan (ESSP). Employees include teachers and other staff including school principals, janitors, administrative assistants, counselors and other	Eligibility criteria to be included in the POM not later than the Effective Date.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	support staff) - are eligible for payment/reimbursement. Describe the eligibility criteria in the Project Operations Manual (POM). Social issues will be examined, as part of the verification which will be performed by an independent monitoring agent, for the retroactive financing, to verify any issues related to grievance redress and information disclosure/feedback. Corrective measures (if any) identified will be implemented.	The verification shall be carried out 3 months from the date the funds are transferred by the Bank to MOF. Corrective measures, if identified, will be implemented throughout project implementation.	
1.3	TECHNICAL ASSISTANCE (a) MoF shall contract an auditing firm to conduct an Audit for the retroactive financing. (b) Ensure that the studies, including, inter alia, the preparation of an Audit, 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. (c) Incorporate relevant aspects of the ESCP, including Labor Management measures, data privacy clauses in the E&S specifications of tender files submitted to potential firms. Then, ensure that providers comply with the ESCP specifications of their respective contracts.	(a) By the Effective Date. (b) Throughout Project implementation. (c) Throughout Project implementation.	MoF
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES MoF Employees will be governed by the terms and conditions of their existing contractual arrangements. However, the provisions of ESS2 related to protection in the work force (i.e. regarding child labor, minimum age and forced labor) and OHS will apply to MoF employees. These provisions will be included in the POM. Workers of the Audit firm are considered project contracted workers and applicable ESS2 provisions, including for grievance redress, will be included in the POM and in the firm contract.	Provisions included in the POM by Effective Date. To be implemented throughout project implementation.	MoF
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY MoF to include non-disclosure/data privacy agreements in the bidding documents for audit firms to maintain confidentiality of private information, including, inter alia, personal data, salaries etc. Audit firm to implement and adhere to data privacy requirements.	During preparation of procurement documents for the auditing firm. To be implemented throughout the contract period.	MoF

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Stakeholder Engagement during project preparation: Bilateral consultations with key institutions (IT Financial Department, Development Expenditure Unit, Budget General Directorate, Compliant Unit) were held over the phone on January 28, 2024 (prior to appraisal) to get feedback about the project. Representatives were informed about the proposed project and anticipated risks/impacts and potential mitigation measures. Discussions also focused on the availability and functioning of the grievance mechanism at MoF. All contacted representatives verified that there are no project activity related social issues to be reported from the retroactive financing period. The project will be of overall benefit to thousands of education personnel families.</p> <p>The MoF representative explained that information disclosure is mainly done through a Facebook page: https://www.facebook.com/PMOFPS?locale=ar_AR. This mechanism will also be used for the project as required.</p> <p>10.1 Stakeholder Engagement during project implementation: Engagement with stakeholders also including vulnerable groups (within education personnel vulnerable categories include (but are not limited to) women headed households, households with family members with disabilities, and households in areas affected by security challenges) will be ensured during the project implementation. Specifically, feedback from these groups will be included in the project audit. Accessible and functioning mechanisms for grievance redress will also be ensured.</p> <p>a. Stakeholder engagement measures for the Project, including for information disclosure/feedback and grievance redress, will be described in the POM.</p> <p>b. Status of complaints received for the retroactive financing period will be examined in the verification undertaken by the project (under 1.2 above) and corrective actions (if any) will be implemented to resolve (as possible) eligible/admissible complaints (pertaining to the retroactive financing period) and strengthen the information disclosure/feedback mechanism.</p>	<p>(a) Include stakeholder engagement measures in the POM and adopt these measures by Effective Date and thereafter implement the measures throughout Project implementation.</p> <p>(b) The verification to be done 3 months from the date the funds are transferred by the Bank to MOF and corrective actions to be implemented (as required) throughout project implementation.</p>	MoF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>MoF has a Complaints Unit for addressing complaints and this will be used for the project. Project affected parties will be able to raise their concerns and submit their inquiries or complaints through the MOF centralized complaint system. Affected beneficiaries can submit their complaints electronically via the electronic grievance form that is available at the MoF website http://www.pmf.ps/pmf/internal.php?var=60 or through the government electronic complaint portal available at the https://cs.pmo.gov.ps/. Complainants can also reach out to the Head of the Complaint Unit at the MoF, to file a complaint in person. Complainants can also file a complaint through email at ikhlasbader2018@gmail.com or reach out to the Head of the Complaint Unit on the mobile number at +972 (0) 599370517. The complaints mechanism also deals with complaints regarding sexual exploitation and abuse/sexual harassment (SEA/SH) and includes a referral mechanism for survivors through the Ministry of Social Development.</p>	Maintain the existing grievance mechanism and operate it throughout Project implementation.	MoF