

MINISTRY OF EDUCATION SUDAN

Sudan Education COVID-19 Response Project (P174220)

DRAFT

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

Federal Ministry of Education, Khartoum

June 06, 2020

Sudan Education COVID-19 Response Project (P174220)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Sudan will implement the **Sudan Education COVID-19 Response Project (the Project)**, with the involvement of the Federal and State Ministries of Education, Partners and Fund organizations, key implementing agencies, contracted CSO/NGOs, Interested Parties and direct stakeholders. The International Development Association (the Association) has agreed to administer the financing for the Project provided by the Global Partnership for Education.
2. The Government of Sudan 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, specific documents or plans, Institutional arrangements and capacity requirements, as well as the timing for each of these.
3. The Government of Sudan will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF) provided for the umbrella project (P172812) and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Government of Sudan is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the ministries, agencies or units 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 Sudan 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 Sudan, 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 Sudan 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 Sudan. The Government of Sudan 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 Sudan shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include, for example, environmental, social, health and safety, or gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: 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 implementation of ESMF procedure, the status of preparation and implementation of E&S documents required under the ESCP, Stakeholder Engagement activities, and functioning of the Grievance Redress Mechanisms.</p>	<p>Monthly Reports throughout Project implementation.</p>	<p>The Project Implementation Unit (PIU) of the Ministry of Education (MoE).</p>
B	<p>INCIDENTS AND ACCIDENTS: Promptly notify the Association of any Significant Event. A ‘Significant Event’ means:</p> <p>(a) any significant social, labour, health and safety, security or environmental incident, accident, or circumstance involving the Project, including, without limitation:</p> <ul style="list-style-type: none"> ○ explosions, spills, and any workplace accidents that result in death, serious or multiple injury, or material pollution, or ○ any violent labor unrest or dispute between the Borrower or security forces assigned to protect the Project and local communities or ○ any gender-based violence, sexual exploitation or abuse suffered by beneficiaries receiving education services at an education facility under the Project; or <p>(b) any other event or circumstance having, or which could reasonably be expected to have, a material adverse effect on the implementation or operation of the Project in accordance with the ESF.</p> <p>Provide sufficient detail regarding the Significant Event, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any supervising entity, as appropriate.</p> <p>Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notification: Notification to the Association will be made by electronic means within seventy-two (72) hours of the TASK FORCE of the MoE learning of the Significant Event. Notification will include: (a) information on any impacts resulting, or likely to result, from the Significant Event, and (b) identification of any part of the information for which confidentiality is required.</p> <p>Summary Report: As soon as reasonably practicable, but no later than thirty (30) days after such Significant Event, provide the Association with a Summary Report that includes (i) a description of such Significant Event, (ii) the measures, if any, that the Recipient is taking or plans to take to address such Significant Event and to prevent any future similar event, and (iii) identification of any part of the information for which confidentiality is required.</p> <p>Follow-up Reporting: Keep the Association informed of the on-going implementation of the said measures and plans.</p>	<p>The PIU of the Ministry of Education (MoE).</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	CONTRACTORS MONTHLY REPORTS: In the event that contracts are issued using the World Bank’s standard procurement documents requiring monthly reports, such reports will be submitted to the Association by the Government of Sudan upon request.	As required by te Association	PIU of the MoE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: Establish and maintain an organizational structure with qualified staff and resources to support the management of E&S risks The TASK FORCE in the MoE will maintain the two staff positions for environmental and social management.	The structures specified at MoE level will be maintained throughout Project implementation.	PIU
1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT: Adopt and implement, the updated Environmental & Social Management Framework (ESMF) of the parent project, and ancillary instruments covering risk management in specialized fields (see below) in a manner acceptable to the Association.	See 1.3 below.	See 1.3 below.
1.3	MANAGEMENT TOOLS AND INSTRUMENTS <ul style="list-style-type: none"> - Screen all proposed subprojects in accordance with the ESMF procedure contained in the ESMF updated for the Project; - Develop for each subproject an ESMP, as appropriate; - After approval in accordance with the ESMF, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Association. 	<ul style="list-style-type: none"> - Each sub-project will be Screened according to the ESMF procedure, and the preliminary design modified as required in the form of an Environmental & Social Management Plan (ESMP) to reflect any required mitigating measures, prior to approval and implementation of the subproject. - The mitigating measures specified during the subproject Screening will be implemented <i>during subproject implementation and before finalization of the subproject.</i> - The number of subprojects planned, screened and mitigating measures implemented will be reported <i>in Quarterly and Monthly Reports.</i> - All subprojects will be supervised <i>throughout implementation</i> - Neither the subproject screening report forms nor the subproject ESMPs require the Association’s prior review or approval. 	<p>A member of the State PIU is responsible for the Screening. This may be delegated to the School director but responsibility remains with the PIU.</p> <p>A member of the State PIU is responsible for ensuring that the mitigating measures are implemented. This may be delegated to the School Director but responsibility remains with the PIU.</p> <p>Reporting to the Association is the responsibility of the PIU in the MoE.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Adopt and implement measures as specified in the agreement for managing contracts regarding the supply and distribution of digital tools and materials that would be financed by the proposed project.</p>	<p>Implementation of the measures will take place in subprojects involving contractors <i>during on-site implementation, throughout the Project.</i></p> <p>Implementation of the measures will be reported <i>in the Monthly Reports.</i></p>	<p>Implementation of the measures is the responsibility of the School Director, with State MoE oversight.</p> <p>Reporting to the Association is the responsibility of the PIU in the MoE.</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Plan (LMP) that has been developed for the parent Project. The Sudan Education COVID-19 Response Project (P174220) will use update the LMP prepared for Sudan Basic Education Emergency Support Project (P172812).</p>	<p>Implementation of the LMP will take place in all the subprojects <i>during on-site implementation, throughout the Project life.</i> The LMP will be updated if needed anytime during the project implementation.</p> <p>Implementation of the LMP will be reported <i>in the Monthly Reports.</i></p>	<p>Implementation of the LMP is the responsibility of the School Director, with State MoE oversight.</p> <p>Reporting to the Association is the responsibility of the TASK FORCE in the MoE.</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>The grievance redress mechanism (GRM) for sub-project workers will be operational <i>prior to engaging the sub-project workers</i> and will be maintained <i>for all sub-project implementation throughout the Project.</i></p> <p>Implementation of the LMP will be reported <i>in the Monthly Reports.</i></p>	<p>Implementation of the GRM is the responsibility of the School Director, with State MoE oversight.</p> <p>Reporting to the Association is the responsibility of the PIU in the MoE.</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Adopt, and implement Occupational Health and Safety (OHS) measures (including emergency preparedness and response), as specified in the ESMF.</p>	<p>The OHS measures will be operational <i>prior to engaging the sub-project workers</i> and will be maintained <i>for all sub-project implementation throughout the Project.</i></p> <p>Implementation of the OHS measures will be reported <i>in the Monthly Reports.</i></p>	<p>Implementation of the OHS measures for sub-project workers is the responsibility of the School Director, with State MoE oversight.</p> <p>Reporting to the Association is the responsibility of the PIU in the MoE.</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT [the relevance of ESS3 is established during the ESA process. ESS3 may require the adoption of specific measures to cover energy, water and raw materials use, management of air pollution, hazardous and nonhazardous wastes, chemicals and hazardous materials and pesticides. Depending on the project, these measures may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS3-related measures are covered under an existing document or as stand-alone actions. See examples below].</p>		
3.1	<p>E-WASTE MANAGEMENT PLAN: Since the project is utilizing electronic devices (I Pads), then it is expected that the project activities may generate e-waste</p>	<p>During <i>implementation</i> of the project any potential e-waste generation need to be reported on monthly bases.</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Include in the sub-project ESMP, adopt and implement mitigation measures, if any.</p>	<p>During the implementation and operation of the project.</p>
<p>ESS 4: COMMUNITY HEALTH AND SAFETY [the relevance of ESS4 is established during the ESA process. As with ESS3, ESS4 may require the adoption of specific measures that may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS4-related measures are covered under an existing document or as stand-alone actions. See examples below].</p>		
4.1	<p>TRAFFIC AND ROAD SAFETY: Though it is not expected that project activities will involve traffic and road safety risks, the project, in collaboration with relevant agencies, will develop and conduct a road safety session for teachers, students and other key players.</p>	<p>During the implementation and operation of the project.</p> <p>Implementation of the road safety sessions will be reported <i>in the Monthly Report</i>.</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, as specified in the ESMF, and include such measures, as appropriate, in the sub-project designs and ESMPs in a manner acceptable to the Bank.</p>	<p>Adoption of the Community H&S measures will be <i>prior to commencing implementation</i> of all sub-projects and will <i>continue during the operations of such sub-projects</i>.</p> <p>Implementation of the Community H&S measures will be reported <i>in the Monthly Reports</i>.</p>
<p>Regular reporting by PIU.</p>	<p>Regular reporting by PIU</p> <p>Implementation of the road safety sessions is the responsibility of the School Director, with State MoE oversight.</p> <p>Reporting to the Association is the responsibility of the PIU in the MoE.</p> <p>Implementation of the Community H&S measures is the responsibility of the School Director, with State MoE oversight</p> <p>Reporting to the Association is the responsibility of the PIU in the MoE.</p>	

4.3	GBV AND SEA RISKS: [For projects with a moderate, substantial, or high prevalence of GBV risk] Update/Prepare, adopt, and implement the Gender-Based Violence Action Plan (GBV Action Plan), that will be prepared for the Sudan Basic Education Emergency Support Project (P172812) proportionate to the potential risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) for the Sudan Education COVID-19 Response Project (P174220).	Adoption and Implementation of the GBV Action Plan will be done within six months of effectiveness and during project implementation and will be maintained throughout the Project life. Implementation of the GBV Action Plan will be reported <i>in the Monthly Reports</i> .	Implementation of the GBV Action Plan is the responsibility of the PIU in the MoE. Reporting to the Association is the responsibility of the PIU in the MoE.
4.4	GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: [If necessary, specify additional funds available to implement measures to address GBV and SEA risks and impacts that may arise during Project implementation.] The need for additional funds is not anticipated.	Not applicable	Not applicable
4.4	SECURITY PERSONNEL: The need for Security personnel is not anticipated.	Not applicable	Not applicable
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT [the relevance of ESS5 is established during the ESA process. If during Project preparation, it is determined that resettlement documents need to be prepared, this should be reflected in the ESCP. See <u>examples</u> below]			
5.1	RESETTLEMENT PLANS: The Project will not involve any resettlement	Not applicable	Not applicable
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES [the relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the adoption of specific measures that may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS6-related measures are covered under an existing document or as stand-alone actions. See <u>examples</u> below].			
6.1	BIODIVERSITY RISKS AND IMPACTS: The ESMF procedure is designed to eliminate all subprojects that could potentially have biodiversity risks or impacts.	Not applicable	Not applicable
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [See examples of possible actions below, if determined that ESS7 is relevant].			
7.1	Social Assessment: The Sudan Education COVID-19 Response Project (P174220) content development for television, radio, newspaper will be informed by the Social Assessment being prepared for the Sudan Basic Education Project (P167169) and Sudan Basic Education Emergency Support Project (P172812). A separate Social Assessment is not anticipated for this project.	Not applicable	Not applicable
7.2	GRIEVANCE MECHANISM: All grievances will be managed by the Grievance Mechanism, 10.2 below.	See 10.2 below.	See 10.2 below.
ESS 8: CULTURAL HERITAGE [the relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the adoption of specific measures that may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS8-related measures are covered under an existing document or as stand-alone actions. See <u>examples</u> below].			

8.1	CHANCE FINDS: Not anticipated in the project.	Not applicable	Not applicable
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs). See below a couple of examples of actions that should be considered when FIs are involved.]			
9.1	The Project doesn't involve FIs	Not applicable	Not applicable
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt, and implement Stakeholder Engagement Plan (SEP) throughout the duration of the Project	The implementation of the SEP will commence during project implementation. The SEP implementation will be reported in <i>the Monthly Reports</i> .	Implementation of the SEP will be the responsibility of the PIU. Reporting will be the responsibility of the PIU
10.2	GRIEVANCE MECHANISM A Grievance Redress Mechanism (GRM) will be adopted, implemented and monitored for the duration of the Project, covering all potential grievances related to all aspects of the project.	The GRM will be rolled out <i>during Project implementation</i> The implementation of the GRM will be monitored and reported <i>in the Monthly Reports</i>	The PIU will be responsible for rolling out, implementing and monitoring the GRM Reporting to the Association is the responsibility of the PIU in the MoE.
CAPACITY SUPPORT (TRAINING)			
CS1	Training will be required for the PIU, state and locality MoE staff, on specific aspects of environmental & social risk management, stakeholder engagement, occupational health & safety and all other instruments necessary for compliance with the ESF.	ESS-related training will be delivered to relevant staff as required, including front-line implementers. Reporting on training will be <i>in the Monthly Reports</i> .	Responsibility for ensuring that the necessary training is provided lies with the PIU. Reporting will be the responsibility of the PIU.
CS2	[Specify training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.]	As CS1 above.	As CS1 above.