

**Government of the Democratic Republic of the
Congo**

**Ministry of Primary, Secondary, and Technical
Education (MEPST)**

**DR Congo Emergency Equity and System
Strengthening in Education/P172341**

Draft

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

May 7, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Democratic Republic of the Congo (DRC) will implement the *DR Congo Emergency Equity and System Strengthening in Education Project* (P172341) (EESSE) with the involvement of the following Ministries/agencies/units: The Ministry of Primary, Secondary, and Technical Education (MEPST); in collaboration the Office of the President of the DRC, the Ministry of Finance, the Ministry of Budget, and the Provincial Education Directorates in the Provinces of Kinshasa, Kongo Central, Kwilu, Nord Kivu, Sud Kivu, Ituri, Lomami, Kasai, Kasai Central and Kasai Oriental. The *International Development Association (hereinafter the Association)* has agreed to provide financing for the Project.
2. The DRC through the MEPST 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 DRC 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), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Sexual Exploitation and Abuse/Harassment (SEA/H) risk mitigation measures included in the this ESCP and the ESMP, and the timelines specified in those E&S documents.
4. The DRC 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 DRC as required by the ESCP and the conditions of the legal agreement, and the World Bank 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 DRC, 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 DRC, through the PIU or other delegates, 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 DRC, through the PIU or other delegates. The DRC, through the PIU or other delegates, 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 DRC, through the PIU, shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include *specify risks and impacts that are relevant to the Project, such as environmental, health, and safety impacts, waste management, gender-based violence (GBV), including sexual exploitation and abuse/sexual harassment (SEA/H), the current insecurity situation in some project regions (mainly Kasai and Eastern Regions; and poor coordination among sector stakeholders.*

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The Government of DRC, through the PIU, will 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, status of preparation and implementation of Environmental and Social instruments required under the ESCP (including ESMPs, LMP, SEP, and grievance mechanism(s)).</p>	Quarterly reporting throughout Project implementation.	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The Government of DRC, through the PIU, will 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 road incidents, GBV/SEA/H, discrimination in the recruitment of teachers, as appropriate for the type of operation.)</p> <p>The Government of DRC 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 Association's request, the PIU will prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association within 48 hours after learning of the incident or accident (for serious and indicative incidents), and within the 24 hours after learning of the incident (for severe incidents) in line with the World Bank Environment and Social Incidence Response Toolkit (ESIRT). An incident report would be provided within a timeframe acceptable to the Association as requested</p>	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>
C	<p>CONTRACTORS MONTHLY REPORTS</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. Such monthly monitoring reports would be submitted to the Association by the Borrower upon request.</p>	Monthly reporting for contracted work(s) throughout contract/sub-contract period.	Contractor(s)/Subcontractor(s).

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>The Government of DRC will maintain an organizational structure, the PIU, with qualified staff and resources to support management of Environmental and Social risks: in addition to the environmental specialist already on board, the PIU will hire one (1) social specialist with a strong background in stakeholder engagement and in conflict and violence prevention; (1) one specialist in gender-based violence and gender equality, and provide resources to support management of Environmental and Social risks.</p>	<p><i>The PIU is already in place.</i> <i>The Social Specialist and GBV/gender equality Specialist will be in place no later than 3 months after Effectiveness.</i> <i>The organizational structure, including specialists, are to be maintained throughout Project implementation</i></p>	<p>PIU Coordinator/ Environmental and Social Specialists</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>The Government of DRC, through the PIU, will carry out, adopt, and disclose an environmental and social assessment of the Project including the following instruments: A Generic Environmental and Social Management Plan (ESMP), a Social Assessment, Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP). A Sexual Exploitation and Abuse/Harassment (SEA/H) Action Plan has been developed and will be included in the project's ESMP and Operations Manual</p>	<p><i>The generic ESMP will be prepared within the six months after Effectiveness and thereafter implemented throughout Project implementation.</i> <i>The initial SEP was prepared before Appraisal.</i> <i>The LMP and Terms of Reference for the Social Assessment were prepared before Board Approval.</i> <i>The Social Assessment overview will be completed by Effectiveness. The comprehensive Social Assessment will be finalized no later than one year after Effectiveness.</i> <i>The SEA/H Action Plan was developed prior to Appraisal and is described in this ESCP (see sections. 4.3 and 4.4) and in the PAD, and will be included in the ESMP.</i></p>	<p>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>The Government has developed and will implement risk management and assessment tools (Plans), including, but not limited to the following:</p> <ul style="list-style-type: none"> - This ESCP - Generic ESMP - Social Assessment - SEP - LMP - SEA/SH Action Plan <p>Where necessary and in accordance with the ESCP, a screening for specific risks will be carried out risks and impacts will be managed in accordance with the generic ESMP.</p>	<p><i>The following documents were prepared and submitted to the World Bank for approval prior to the appraisal of the project: ESCP and Initial version of SEP</i></p> <p><i>An initial draft SEP was prepared, consulted and disclosed before appraisal and will be updated before effectiveness and periodically thereafter as needed.</i></p> <p><i>The LMP was prepared prior to Board Approval.</i></p> <p><i>The Terms of Reference (TORs) for the Social Assessment was prepared, consulted upon and disclosed before Board approval of the project. The Social Assessment will be carried out after Board approval and completed no more than one year after Effectiveness.</i></p> <p><i>The SEA/H Action Plan was developed prior to Appraisal and is described in this ESCP (see action 4.3 and 4.4 below) and in the PAD, and will be included in the ESMP.</i></p> <p><i>The Generic ESMP will be prepared consulted upon and disclosed in the country and the World Bank external website within six months after Effectiveness, and thereafter implemented throughout Project implementation</i></p>	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>In case contractors and sub-contractors are hired for the Project activities or sub-activities, the PIU will incorporate the relevant aspects of the ESCP and ESMP, including the relevant environment and social documents and/or plans, and the Labor Management Procedures, 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><i>Prior to the preparation of procurement documents.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p>	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The PIU will develop disclose and implement Labor Management Procedures (LMP) covering project workers, including information on Occupational Health and Safety Standards (OHSS) and measures to be included in the ESMP, and mitigation measures to address SEAH risks as indicated in the SEA/H Action Plan, as well as measures to be taken as a result of the COVID-19 virus.</p> <p>All project staff will be required to attend information and awareness sessions on GBV/SEAH throughout project implementation.</p>	<p><i>The LMP was prepared by Board Approval and will maintained throughout Project implementation.</i></p>	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>The PIU will establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. This will include reporting and allegation procedures regarding SEA/H and an accountability framework and response to complaints.</p>	<p><i>Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.</i></p>	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the generic ESMP.</p>	<p><i>Same timeframe as the implementation of the generic ESMP.</i></p>	<p>Responsibility: PIU Environment & Social Team</p> <p>Accountability: PIU Coordinator</p> <p>Funding: Project Funds</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	WASTE MANAGEMENT PLAN: As part of the generic ESMP, measures for waste management in schools will be set out.	<i>Same timeframe as the preparation and implementation of the generic ESMP and thereafter implemented throughout Project implementation</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the generic ESMP to be prepared under action 1.2. above.	<i>Same timeframe as the preparation and implementation of the generic ESMP, and thereafter implemented throughout Project implementation</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
3.3	MANAGEMENT OF HAZARDOUS MATERIALS: Measures to ensure the effective management of the distribution, storage and use of potentially hazardous materials for hygiene, sanitation and disinfection as part of the maintenance of school facilities.	<i>Same timeframe as the preparation and implementation of the generic ESMP, and thereafter implemented throughout Project implementation</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks in the surrounding of schools as required in the generic ESMP.	<i>Same timeframe as the preparation and implementation of the generic ESMP, and thereafter implemented throughout Project implementation</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
4.2	COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the schools workers and students arising from Project activities, including risks of communicable diseases and other health and hygiene issues related to the influx of additional school children which will lead to overcrowding of classrooms and other school facilities, behavior of Project workers, response to emergency situations such as Ebola and COVID-19, and include these measures in the generic ESMPs to be prepared, in a manner acceptable to the Association.	<i>Same timeframe as the preparation and implementation of the generic ESMP and thereafter implemented throughout Project implementation</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
4.3	SEA/H RISK: The Project has piloted the SEA/H risk assessment tool for the education sector. The risk screening carried out by the team indicated that SEA/H risk is high. Preliminary risks identified relate to the potential sexual abuse of children by teachers and school staff and school staff. An overview of key risks is outlined in the SEA/H Action Plan prepared by the team. A summary of this plan has been included by the team in an Annex to the PAD. The full version of the document will be included in the ESMP and Project Operations Manual	SEA/H Action Plan has been included in the PAD, and will be included in the ESMP and Project Operations Manual	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds

4.4	<ul style="list-style-type: none"> • SEA/H RISKS DURING PROJECT IMPLEMENTATION: Ensure that clear codes of conduct are signed by teachers outlining the accountability and response framework in case of non-compliance and accompanied by brief, but informative, explanatory scripts outlining key SEA/H prevention and response concepts; • Conduct awareness-raising, to be complemented by broadcast radio programming, on SEA/H prevention and response, including codes of conduct and complaint mechanisms, for communities, families of students attending schools, students, and teaching personnel; • Train a female guidance counsellor, teacher or PTA member at school level to enable safe and confidential disclosure of SEA/H incidents, provide basic psychosocial support and referral to services; • Develop SEA/H specific GRM procedures to allow the safe and ethical disclosure, documentation, response, management and closure of SEA/H grievances, with agency at national level to recruit and train personnel to handle SEA/H complaints and to identify service partners for referrals at provincial level; • Ensure that gaps identified in terms of PEP kit coverage in targeted provinces are addressed by the external agency who will be brought on board to provide support on SEA/H services; and • Ensure that SEA/H prevention and mitigation measures outlined above are monitored by a specialized agency/NGO to be hired by the project. <p>The key challenge faced by the Project is the phasing of these risk mitigation measures considering the large geographical area and numbers of schools covered by the project. The team proposes to follow a phased approach to risk mitigation over a three-year period as indicated in the time-line column.</p>	<p><i>The project will put in place a basic package of SEA/H measures in the 10 Project provinces. The package includes signed codes of conduct, identification and training of focal points at school level, and awareness-raising activities regarding SEA/H prevention and response for communities and schools, including complementary radio broadcasts. These will be put in place as early as implementation realities on the ground allows and will be done in three phase with a Phase 0 (the latter will be in place before effectiveness through a PPA). Phasing will be as follows:</i></p> <p><i>Phase 0 – The Project will immediately establish a contingency facility with external agencies once the Project is approved by the Board. This will allow the project to have basic capacity to refer SEA/H complaints to emergency support services for survivors through a provisional project hotline. During this period, the Project will also leverage existing services where available – primarily in the Kivu and Kasai provinces from humanitarian agencies and the World Bank GBV Prevention and Response Project (P166763). Given the scarcity of services across the DRC, the Project will also contract external agencies to provide basic emergency services, namely, psychosocial support and medical care in the case of sexual assault.</i></p> <p><i>Phase I -First 9 months of implementation</i></p>	
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		<ul style="list-style-type: none"> • <i>Codes of conduct and accompanying informative explanatory scripts are reviewed and signed by all relevant personnel in 10 Provinces.</i> • <i>SEA/H channel in the GRM hotline is established.</i> • <i>In line with ethical principles for the management of SEA/H cases, the establishment of a SEA/H channel in the project's GM will be preceded by the establishment of contracts for the provision of psychosocial support and referral for medical services (for cases of sexual assault) for potential survivors who come forward, in all 10 Provinces.</i> • <i>Purchase and prepositioning of PEP in three Provinces. While 7 of the 10 Provinces are currently covered by PEP kit provision through USAID/IMA health support, this support is not extended to Kinshasa, Kwilu and Congo Central.</i> • <i>Rolling out of the basic package as well as follow-up measures to be implemented under Phase II will be monitored by a Third-Party Monitor/Independent Verification Agency to be hired by the Ministry of Education from year 1.</i> <p>End of year 1 and 2 of implementation</p>	
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		<i>The Project will progressively complement the phase I services with additional school-level support. To facilitate: (i) entry points for complaints at school level through the training of focal points and; (ii) more robust awareness raising activities at school and community level, the project will put in place a series of contracts with a new set of NGOs focusing on SEA/H prevention. These additional activities will be put in place in five provinces by the end of year 1 and in the remaining five by the end of year 2.</i>	
4.4	SECURITY PERSONNEL: No security personnel are currently planned to be deployed to the project areas. But if required, the PIU will prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the World Bank.	<i>Prior to engaging security personnel and thereafter implemented throughout Project implementation</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS: There are no actions under the project likely to result in land acquisition, restrictions on land use, or involuntary resettlement, therefore there are no Resettlement Plans or mitigation measures planned at this point in the project.		
5.2	GRIEVANCE MECHANISM Since no resettlement or restrictions on land use are anticipated, any relevant grievances that may subsequently arise during project implementation will be addressed through the overall project GRM described in the SEP and ESMP	<i>GRM procedures (if needed) to be included in SEP, prepared prior to Board approval, and the ESMP, prepared during project implementation.</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS: There are no actions under the project resulting in biodiversity conservation and sustainable management of living natural resources, therefore there are no mitigation measures to be undertaken under this ESS6		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

7.1	INDIGENOUS PEOPLES PLAN: Given the project design, this Standard is not currently relevant. However, the SEP will include outreach measures to ensure indigenous populations, including those living in remote areas, are aware of the new free primary education opportunity.	<i>Outreach to IPs included in the SEP, prepared prior to Appraisal.</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
7.2	GRIEVANCE MECHANISM: Any grievances that may subsequently arise during project implementation will be addressed through the overall project GRM described in the SEP and ESMP. The SEP will also contain outreach measures to ensure IPs receive information in timely and culturally appropriate ways to ensure they are aware of project opportunities and risks linked to free primary education.	<i>Outreach to IPs included in the SEP, including project GRM, prepared prior to Appraisal.</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
ESS 8: CULTURAL HERITAGE			
8.1	There are no actions under the project with potential impact on Cultural Heritage, therefore there are no mitigation measures to be undertaken under this ESS8.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	There are no actions under the project resulting in financial intermediaries, therefore there are no mitigation measures to be undertaken under this ESS9		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION The PIU will prepare, adopt, and implement a stakeholder engagement plan (SEP). Prepare a draft Stakeholder Engagement Plan (SEP). Update, adopt, and implement Stakeholder Engagement Plan (SEP) and ensure SEP is incorporated into the project's management system, adequate staffing and budget is allocated to implementing the SEP. Specific consultations with all key stakeholders, including women and girls to gather their perspectives on the project and potentially related risks will be planned and included as part of the project SEP. The SEP also includes ADDITIONAL guidance on public consultations/stakeholder engagement which takes into account the social distancing measures for COVID-19.	<i>An initial SEP was prepared and disclosed prior to Appraisal and will be updated within six months of Effectiveness, and subsequently as required throughout life of project. The SEP will be implemented following Effectiveness and throughout the life of the project.</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds

10.2	PROJECT GRIEVANCE MECHANISM The PIU will prepare, implement, and maintain a grievance mechanism, as described in the SEP.	<i>A GRM was prepared, consulted, validated with MoE and included in the SEP prior to Appraisal, and will be maintained through project implementation.</i>	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
CAPACITY SUPPORT (TRAINING)			
CS1	The PIU will need training in the following areas: (i) Environmental and Social Commitment Plan (ESCP): how to prepare and implement it (ii) Development and implementation of the Stakeholder Engagement Plan (SEP) and in its monitoring & evaluation, (iii) The development and implementation of Labor Management Procedures (LMP) (iv) Training in mitigation, prevention and response and the development and implementation of the SEA/H Action Plan (v) Capacity building in other specific aspects of assessment and implementation of environmental and social risk management practices, as identified through needs assessments of key project actors during project implementation. (vi) Health, safety and security risks, including risks related to road traffic in the zones surrounding schools with high pedestrian traffic (including schoolchildren).	Training on ESCP and SEP: prior to appraisal Training on other subjects: as soon as possible after Effectiveness and throughout project implementation.	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds
CS2	<i>The PIU will develop a training program for project and school workers in preventive and contingency measures in the workplace, such as workplace accident management and incident reporting, with specific examples for the management of health, safety and security, The PIU will ensure that schools have information program and measures for students on health, safety and security issues, including road safety.</i> <i>Training for school workers and other project staff related to SEA/H is described in the SEA/H Action Plan.</i>	As soon as possible after project effectiveness and throughout project implementation.	Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds