



*Kingdom of Tonga*

**TONGA SAFE AND RESILIENT SCHOOLS  
PROJECT (P174434) and  
ADDITIONAL FINANCING (P P178849)**

**ENVIRONMENTAL and SOCIAL  
COMMITMENT PLAN**

DRAFT: 1 April 2022

## Abbreviations and Acronyms

CESMP	Contractor Environmental and Social Management Plan
CERC	Contingency Emergency Response Component
ESCP	Environmental and Social Commitment Plan
ESHS	Environmental Social Health and Safety
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
E&S	Environmental and Social
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GOT	Government of Tonga
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
LMP	Labour Management Procedures
MET	Ministry of Education and Training
MLNR	Ministry of Lands and Natural Resources
MOF	Ministry of Finance
MOI	Ministry of Infrastructure
OHS	Occupation Health and Safety
PMU	Project Management Unit
PSC	Project Steering Committee
SEP	Stakeholder Engagement Plan
TOR	Terms of Reference
TSRSP	Tonga Safe and Resilient Schools Project (the Project)
VAC	Violence Against Children
WB	World Bank

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Tonga (hereinafter the **Recipient**) is implementing the Tonga Safe and Resilient Schools Project (the **Parent Project**), , including the activities to be supported under the Additional Financing to the Parent Project (hereinafter collectively, the **Project**), with involvement of: (a) the Ministry of Education and Training (**MET**) as the implementing agency for Components 1,2 and 4 of the Project; and (b) the Ministry of Finance as the implementing agency for Component 3 of the Project. The International Development Association (hereinafter the **Association**) has agreed to provide financing for the Project.
2. The Recipient shall 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 Recipient will also comply with the provisions of any other environmental and social (**E&S**) documents required under the Environmental and Social Framework (**ESF**) and referred to in this ESCP, such as Environmental and Social Management Plans (**ESMP**), Resettlement Action Plans, Indigenous Peoples Plans, and Stakeholder Engagement Plans (**SEP**), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when the implementation of specific measures and actions is conducted by the Ministries referenced in paragraph 1 above.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess progress and completion of the material measures and actions throughout the implementation of the Project.
6. As agreed by the Association and the Recipient, 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 the assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient, shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient. The Recipient shall 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 Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (<b>ESHS</b>) performance of the Project, including but not limited to the implementation of the ESCP, the status of preparation and implementation of environmental and social instruments (e.g., ESMP, SEP, Labour Management Procedures (<b>LMP</b>), Contingency Emergency Response Component ) Environmental and Social Management Framework (<b>CERC ESMF</b>) and COVID 19 Safety Protocol required under the ESCP, Operational Environmental Management Plans (OEMPs) stakeholder engagement activities and grievances log, contractor’s ESHS implementation, ESHS incidents, functioning of the grievance mechanism(s).</p>	Six-monthly throughout Project implementation beginning from the effective date of the Parent Project.	MET PMU/MOF
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>a. 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.</p> <p>b. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or 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, prepare a report on the incident or accident and propose any measures to prevent its recurrence. These activities are outlined in the Project’s Grievance Mechanism (<b>GRM</b>).</p>	<p>Minor incidents shall be reflected in the six-monthly reports required to be delivered to the Association throughout Project implementation. Major issues and/or severe incidents shall be reported to the Association within 24 hours of their occurrence.</p> <p>A report shall be provided within a timeframe acceptable to the Association, as requested.</p>	MET PMU
C	<p><b>CONTRACTORS REPORTS</b></p> <p>a. Require (via inclusion in ESHS specifications for bidding documents) the contractor to notify MET 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.</p> <p>b. Require (via inclusion in ESHS specifications for bidding documents) contractors to provide monthly monitoring reports to MET.</p>	<p>a. Serious and severe incidents to be reported to the PMU Project Manager or her/his alternate and the Association within 24 hours of their occurrence throughout Project implementation and minor incidents shall be reflected in the monthly reports to be delivered to the Association throughout Project implementation; and b. shared with the Association</p>	MET PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
		promptly upon request.	
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a PMU in MET in accordance with the Financing Agreement. The PMU shall be led by the Project Manager reporting to the Chief Executive Officer (CEO) of MET and will be staffed with qualified staff and with the necessary resources to support the management of ESHS risks and impacts of the Project.</p> <p>a. Recruit and retain a full-time local PMU E&amp;S Officer, with terms of reference, qualifications and experience satisfactory to the Association, and who have the necessary skill to manage the E&amp;S risks and impacts associated with the Project.</p>	E&S Officer to be maintained throughout Project implementation.	MET PMU
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS</b></p> <p>a. Carry out environmental and social screening/assessments to identify environmental and social risks and mitigation strategies required and implement Project activities in accordance with the ESMP prepared, disclosed and adopted on the basis of environmental and social screening assessments.</p> <p>b. Develop site specific environmental and social checklists for inclusion in CESMP which identify site specific E&amp;S risks.</p> <p>c. Support the development of and approve any Contractors Environmental and Social Management Plans (<b>CESMPs</b>) prior to the start of major works or an Environmental and Social Code of Practice (<b>ESCOP</b>) for minor works or any other E&amp;S instruments required for the respective Project activities based on the E&amp;S screening or assessment process, following the ESMP and other relevant Good International Industry Practice (<b>GIIP</b>) including the WBG EHS guidelines in a manner acceptable to the Association.</p> <p>d. Incorporate the relevant aspects of this ESCP, including, inter alia, any instruments or other measures required under the ESMP or ESCOP and any other ESS requirements into the ESHS specifications of the procurement documents and contracts with contractors.</p>	<p>a. E&amp;S screening reports/assessments to be approved by the MET PMU, and No Objection Letter (NOL) to be provided by WB E&amp;S specialists prior to the start of works for which a CESMP or ESCOP is required in accordance with the ESMP.</p> <p>b. CESMP or ESCOP or other E&amp;S instruments to be developed and adopted prior to the start of works for which a CESMP or ESCOP is required in accordance with the ESMP and thereafter implemented throughout the carrying out of such activities.</p> <p>c. Requirements for CESMPs or ESCOPs or any other ESS requirements to be included in bidding documents before launching the procurement process for the relevant Project activities.</p> <p>d. Requirements to be included in bidding documents before launching the procurement process for the relevant project activities.</p>	MET PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
	e. Undertake auditing of contractors for compliance with the ESHS specifications of their respective contracts.	e. During implementation of works contracts throughout Project implementation.	
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Update, adopt and implement the following set of prepared and disclosed E&amp;S instruments as required for Project purposes (e.g., if further updates are required by the Association):</p> <ol style="list-style-type: none"> <li>1. ESMP</li> <li>2. LMP</li> <li>3. SEP</li> <li>4. CERC ESMF</li> <li>5. COVID 19 Safety Protocol</li> </ol> <p>Screen each Project activity following the CESMP screening checklist. Include ESMP requirements in bidding documents via preparation of ESHS specifications for bidding documents.</p> <p>Prepare, disclose, and implement the relevant E&amp;S instruments based on the screening process. Component instruments include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• CESMP</li> <li>• Operational management plans within the CESMP to address specific activity risks as required (Waste Management Plans, Traffic Management Plans)</li> </ul>	<p>ESMP, LMP, and SEP, CERC ESMF and COVID 19 Safety Protocol (each dated August 2021) have been prepared, disclosed and adopted and shall be implemented in accordance with the respective terms of each such instrument throughout Project implementation.</p> <p>Location-specific and Component specific CESMPs and other instruments shall be prepared and approved by MET PMU before submission to the Association for review and no-objection prior to the start of works for which a CESMP or ESCOP is required in accordance with the ESMP.</p> <p>TORs and outputs for TA activities shall be submitted to the Association for its review and no-objection prior to their approval by MET.</p>	MET PMU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY
<p>Terms of Reference (<b>TORs</b>) and outputs of TA activities under the Project are to be submitted for review and no-objection by the Association so that the advice and other support provided is consistent with ESSs 1-10 as relevant. TORs for technical studies, advisory services and the recruitment of staff consultants be screened for potential E&amp;S risks and to ensure that advisory services comply with the objectives of the ESF and GIIP.</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
1.4	<p><b>CONTINGENT EMERGENCY RESPONSE COMPONENT</b></p> <p>a. Update, adopt and implement the disclosed <b>CERC-ESMF</b> (Component 3) for the Project, in accordance with the ESSs.</p> <p>b. Prepare, disclose, consult and adopt any E&amp;S instruments which may be required for activities under Component 3 (CERC) of the Project, in accordance with the CERC Manual, CERC-ESMF and Emergency Action Plan to be prepared in accordance with the CERC Manual and CERC-ESMF, and the ESSs, and thereafter implement the measures and actions required under said E&amp;S management plans or instruments, within the timeframes specified in said E&amp;S management instruments.</p>	<p>a) The adoption of the CERC Manual, CERC environmental and social instruments, and the Emergency Action Plan in form and substance acceptable to the Association is a withdrawal condition under Schedule 2 of the Financing Agreement for the Project.</p> <p>b) The E&amp;S instruments which may be required for activities under Component 3 (CERC) of the Project shall be prepared, disclosed, consulted, and thereafter adopted before the carrying out of the relevant Project activities under Component 3 (CERC) of the Project. The E&amp;S instruments shall be implemented in accordance with their terms, throughout the carrying out of the CERC activities.</p>	MOF
1.5	<p><b>EXCLUSIONS</b></p> <p>Exclude the activities listed below as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>• Activities of any type classifiable as “High” risk pursuant to the World Bank’s Environment and Social Standard 1 (ESS1) of the Environment and Social Framework (ESF)</li> <li>• Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts;</li> <li>• Activities that have high probability of causing serious adverse effects to human health and/or the environment not related treatment of COVID-19 cases;</li> <li>• Activities that may have significant adverse social impacts and may give rise to significant social conflict;</li> <li>• Activities that may involve resettlement or land acquisition/use restriction or adverse impacts on cultural heritage;</li> </ul>	<p>These exclusions shall be applied as part of the E&amp;S screening process conducted under Action 1.2 above.</p>	MET PMU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
	<ul style="list-style-type: none"> <li>Activities that are considered by the Association (a) to have potential to cause significant loss or degradation of critical natural habitats whether directly or indirectly or those that could adversely affect forest and forest health; (b) that could adversely affect sites with archaeological, paleontological, historical, religious, or unique natural values; and (c) that may result in involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods; and</li> <li>Use of goods and equipment for activities considered by the Association to meet the following circumstances: (a) activities taking place on or affecting lands abandoned due to social tension/conflict, or lands whose ownership is disputed or cannot be ascertained; (b) activities that demolish or remove assets, unless the ownership of the assets can be ascertained, and the owners are consulted; (c) activities involving forced/conscripted labour, child labor, or other harmful or exploitative forms of labor; and/or other paramilitary purposes.</li> <li>procurement of illegally mined sand.</li> <li>use of asbestos containing materials or lead based paints in new construction.</li> <li>any other activities excluded pursuant to the relevant E&amp;S instruments.</li> </ul>		
1.6	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	Monitor and supervise contractors throughout Project implementation.	MET PMU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT</b></p> <p>Adopt and implement the LMP that has been developed for the Project and which includes:</p> <ul style="list-style-type: none"> <li>Occupational Health and Safety</li> <li>Fair Treatment and Non-Discrimination</li> <li>Prevention of Forced Labor and Restrictions on Child Labor</li> </ul>	LMP (dated August 2021) has been prepared, disclosed and adopted and shall be implemented on its terms throughout Project implementation.	MET PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
	<ul style="list-style-type: none"> <li>Workers' Grievances Mechanism</li> </ul>		
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, operate, monitor, document and update as required the grievance mechanism for Direct Project workers, as described in the LMP and consistent with ESS2 requirements.</p> <p>Establish proportionate rules, to be included in the ESHS specifications of the bidding or contractual document to ensure that all contracted workers, community workers (e.g., project beneficiaries who are engaged in community labour whether paid or unpaid) are briefed or taught by the contractor about (a) their rights to express grievances; (b) where to address a grievance in the first instance; (c) what action they can expect as of right when a grievance is expressed; and (d) that they are adequately protected against sanctions or recriminations.</p>	Establish the Grievance Mechanism before the engagement of project workers and maintain, operate, monitor, document and update as required the Grievance Mechanism throughout Project Implementation.	MET PMU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY MEASURES</b></p> <p>Prepare, adopt, and implement occupational, health, and safety (OHS) measures including compliance with the World Bank Group Environmental, Health and Safety Guidelines (EHSGs), GIIP and national legislation for all Project activities. All vehicles used for the Project shall comply with safety standard and be accompanied by safety equipment and training according to the national requirements.</p>	Prior to the start of works for which a CESMP or ESCOP is required in accordance with the ESMP, and thereafter throughout the carrying out of such activities.	MET PMU
2.4	<p><b>OCCUPATIONAL HEALTH AND SAFETY MEASURES FOR DIRECT WORKERS</b></p> <p>Update, adopt, and implement the OHS measures for the direct workers as outlined in the LMP. Risks (such as road safety, security, avoidance of infection) associated with travel to and work at remote sites shall be a vital focus of the OHS measures.</p>	Within six (6) months after the Effective Date of the Parent Project (allowing time for the OHS measures to reflect concerns of Project staff), and thereafter throughout the carrying out of the Project	MET PMU
2.5	<p><b>OCCUPATIONAL HEALTH AND SAFETY MEASURES FOR CONTRACTED WORKERS</b></p> <p>Update, adopt, and implement OHS measures for contracted workers in the LMP and CESMP through the ESHS Specifications to be included in the contract documentation.</p>	ESHS specifications and training to be included in all contract documents for works and services entered into during the Project implementation period.	MET PMU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
3.1	<p><b>POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Implement pollution prevention and management measures specified in the ESMP.</p> <p>Undertake visual asbestos surveys as a preliminary measure for all works which have the potential to disturb asbestos.</p>	<p>Throughout Project implementation.</p> <p>Visual asbestos surveys to be undertaken by the design consultant during the design phase prior to commencement of construction/ renovation/ refurbishment for all works which have the potential to disturb asbestos.</p>	MET PMU
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Include measures to manage wastes and other types of hazardous and non-hazardous wastes including compliance with EHSGs, GIIP and local legislation as described in the ESMP and CESMPs</p>	Throughout Project implementation.	MET PMU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Adopt and implement measures and actions to assess and manage traffic and road safety risks for civil works activities as described in the ESMP or ESCOP and to be further updated for sites in the CESMP.</p>	Throughout Project implementation.	MET PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
4.2	<p><b>COMMUNITY HEALTH AND SAFETY, GBV and VAC</b></p> <p>a. Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from the project activities and include these measures into the ESMP, CESMPs and ESCOPs in a manner acceptable to the Association.</p> <p>b. MET shall require contractors and workers to commit to and implement a Code of Conduct which includes providing SEA/SH risk reduction measures (safe, accessible, separate facilities for women, well-lit areas, signage, awareness building and M&amp;E of GBV prevalence etc), VAC and GBV training to reduce the incidence of SEA/SH risks.</p>	<p>a. Prior to the start of works for which a CESMP or ESCOP is required in accordance with the ESMP and thereafter throughout the carrying out of such activities</p> <p>b. Prior to the commencement of works and throughout Project implementation.</p>	MET PMU
4.3	<p><b>COMMUNITY HEALTH AND SAFETY/PREVENTION OF INFECTIOUS DISEASE TRANSMISSION</b></p> <p>Implement the measures identified within the ESMP, CESMPs and ESCOPs where risks to community health and safety have been identified in a manner acceptable to the Association</p>	Throughout Project implementation.	MET PMU
4.4	Implement COVID-19 Safety Protocols to manage the risk of COVID-19 transmission.	COVID-19 Safety Protocols (dated August 2021) have been prepared, disclosed and adopted and shall be implemented on its terms throughout Project implementation.	MET PMU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
5.1	<p><b>RESETTLEMENT PLANS</b></p> <p>A key prerequisite based on PREP lessons learnt will be that all schools will be on documented and undisputed land and as such resettlement plans will not be required.</p> <p>Whilst permanent or temporary loss of livelihood is not expected for this project as confirmed within the ESMP, if a proposed Project activity may involve such impact occur once the Project commences, a Livelihood Restoration Plan will be required and prepared in accordance with ESS5.</p> <p>Any land issues will be dealt with through the normal process as dictated by the Tonga Lands Act 1993 (amended 2013) and ESS5 in a manner acceptable to the Association.</p>	Throughout Project implementation.	MET PMU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	Adopt and implement the ESMP or other instruments required for the respective Project activities based on the environmental and social screening or assessment process, following the ESMP and other relevant GIIP to minimise biodiversity impacts associated with land clearing and other construction activities	Throughout Project implementation.	MET PMU
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
<b>NOT RELEVANT</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS</b></p> <p>Adopt, and implement the chance finds procedure described in the ESMP developed for the Project. Chance finds procedure to be included in ESHS specification for works contracts, CESMPs and ESCOPs.</p>	Throughout Project implementation.	MET PMU
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
<b>NOT RELEVANT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Update, disclose, adopt, and implement the TSRSP SEP consistent with ESS10, in a manner acceptable to the Association.</p>	SEP (dated August 2021) has been prepared, disclosed and adopted and shall be implemented on its terms throughout Project implementation.	MET PMU
10.2	<p><b>GRIEVANCE REDRESS MECHANISM</b></p> <p>Establish, maintain, operate, publicize, monitor, and update as required the GRM as described in the SEP.</p>	Establish and publicize prior to the commencement of Project activities, and operate, maintain, monitor, document and update as required throughout Project Implementation.	MET PMU
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p><b>CAPACITY BUILDING PLAN</b></p> <p>Project Management Unit with support from the Ministry of Finance Central Services Unit (CSU) prepare, update, and implement a capacity building plan for E&amp;S risk management with the following outcomes:</p> <ul style="list-style-type: none"> <li>• All project staff familiar with all E&amp;S instruments</li> <li>• Grievance mechanism established and operating effectively</li> <li>• E&amp;S, risk management measures, integrated into Project activity designs</li> <li>• E&amp;S, risk management measures, integrated into Project activity bidding and contracting documents</li> <li>• Contractors and suppliers understand and can implement their E&amp;S obligations (e.g., through CESMP specifications)</li> <li>• Improved environmental health, safety, and sanitation to the project staff and beneficiaries</li> </ul>	Throughout Project implementation.	MET PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY
CS2	Provide targeted training to contractors, suppliers, and project beneficiaries before site-specific Project activities and throughout Project implementation as needed, including but not limited to management of E&S risks, labor management and OHS (particularly working at heights), traffic safety, community health and safety and grievance mechanisms.	Throughout Project implementation	MET PMU