# **REPUBLIC OF NIGER / Ministry of Education**

#### Niger Learning Improvement for Results in Education Project (P168779) and Additional Financing (P180064)

## Updated

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

# <mark>May XX</mark> , 2023

#### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- The Republic of Niger is implementing the Niger Learning Improvement for Results in Education Project (the Project), with the involvement of the Ministry of Education, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the original financing (P168779) and additional financing (P180064) for the Project, as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing (AF) for 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, 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 through the Ministry of Education and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient through the Secretary General of the Ministry of Education. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY	
MONI	TORING AND REPORTING			
A	<b>REGULAR REPORTING</b> 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 E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).	Submit quarterly reports to the Association throughout Project implementation (and an annual report which compiles the quarterly reports). Submit each report to the Association no later than 30 days after the end of each reporting period.	Coordinator, in charge of monitoring and evaluation, environmental and social safeguard specialists of the Project Coordination Unit (PCU)	
В	<ul> <li>INCIDENTS AND ACCIDENTS</li> <li>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 injury . 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.</li> <li>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.</li> </ul>	Notify the Association no later than 48 hours after learning of the incident or accident and not later than 24 hours in cases of SEA/SH and fatality. Provide subsequent report to the Association within a timeframe acceptable to the Association.	Coordinator, Environmental and Social Safeguards Specialists and other PCU staff as needed.	
С	<b>CONTRACTORS' MONTHLY REPORTS</b> Require contractors and supervising firms 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.	Submit the monthly reports to the Association.	Contractor/supplier or any other consultant employed by the project.	
D	NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor's obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB's decision on such referral; (ii) the contractor's Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB's decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.	No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).	Coordinator, Environmental and Social Safeguards Specialists and other PCU staff as needed.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	ORGANIZATIONAL STRUCTURE	The staff of the PCU environmental and	Ministry of Education
	Maintain the Project Coordination Unit (PCU) that was established under the Original	social safeguard team has already been	
	Financing, staffed with qualified staff and resources to support management of	recruited under the Original Financing	
	environmental, social, health, and safety (ESHS) risks and impacts of the Project	and this team shall be maintained	
	including an environmental specialist, a social specialist and a GBV Specialist. The GBV	throughout the implementation of the	
	specialist shall be specifically recruited to coordinate SEA/SH risk management and	Project including AF.	
	mitigation activities associated with project implementation. The PCU shall engage, as		
	necessary, selected UN organizations or national or international NGOs to support	A GBV specialist must be recruited no	Coordinator of the PCU
	project activities. The PCU shall ensure that these organizations are engaged in	later than one month after Effective	
	accordance with terms of reference acceptable to the Association and adhere to the	Date of the Additional Financing. And	
	provisions of this ESCP and comply with all relevant ESS.	thereafter maintained throughout	
		Project implementation.	
2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS		
	1. Update as required, disclose, consult, adopt and implement the Environmental and	1. The Parent Project ESMF (adopted	
	Social Management Framework (ESMF) that was adopted under the Original Financing,	and disclosed on 03/16/2020) shall be	PCU
	consistent with the relevant ESSs.	updated, adopted and disclosed no later	
		than prior to the project appraisal.	
	2. Prepare or update as relevant, consult, disclose, adopt, and then implement the		
	following risk assessment and management tools and instruments, consistent with the	2. The RPF shall be prepared, consulted,	
	relevant ESSs:	approved and disclosed on the	
	- Resettlement Policy Framework (RPF);	Recipient's and Association's websites	
	- Stakeholder Engagement Plan (SEP);	no later than prior to project appraisal.	
	- Grievance Redress Mechanism (GRM) Manual;		
	- Labor Management Procedure (LMP);	3. The SEP adopted and disclosed in	
	- Detailed and separate Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)	March 2020 shall be updated, adopted	
	Risk Management and Mitigation Action Plan	and disclosed no later than prior to	
	- Security Risk Assessment (SRA) and Security Management Plan (SMP);	project appraisal.	
	- Environmental and Social Impact Assessment (ESIA), and		
	- Environmental and Social Management Plan (ESMP).	4. The Parent Project GRM manual	
		adopted and disclosed in May 2021, shall	
		be updated, adopted and disclosed prior	
		to the Effective Date of the AF.	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	5. While there are no new worker	
	categories (as compared to the Parent	
	Project) due to the new AF activities, the	
	LMP has also been updated to reflect the	
	changes made through this AF and to	
	better reflect the SEA/SH prevention	
	measures. The updated LMP shall also	
	be adopted and disclosed prior to	
	project appraisal.	
	6. The separate and detailed Sexual	
	Exploitation and Abuse (SEA) and Sexual	
	Harassment (SH) Risk Management and	
	Mitigation Action Plan, adopted on	
	02/16/2021, shall also be updated as	
	necessary, consulted, disclosed and	
	adopted no later than one month after	
	the Effective Date of the AF; and the PIU	
	will carry out its principal actions, as will	
	be agreed with the Bank, before the start	
	of any infrastructure work financed by	
	the AF	
	7. A SRA shall be conducted and a SMP	
	shall be prepared prior to project	
	appraisal; and a summary of the SMP	
	shall also be disclosed prior to project	
	appraisal.	
	8. The ESIA and ESMP shall be prepared,	
	disclosed, consulted and adopted during	
	the preparation of the sub-projects and	
	before the start of the works.	
	9. Once adopted, all these instruments	
	shall be implemented throughout the	
	implementation of the entire Project.	
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MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and 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.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	Ministry of Education and PCU
1.4	<b>TECHNICAL ASSISTANCE</b> Ensure that the consultancies, 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.	Throughout Project implementation.	PCU
1.5	<ul> <li>CONTINGENT EMERGENCY RESPONSE FINANCING</li> <li>a) Ensure that the Contingent Emergency Response Component (CERC) Manual includes a description of the ESHS assessment and management arrangements for the implementation of the CERC component, in accordance with the ESSs.</li> <li>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under the CERC component of the Project, in accordance with the CERC Manual (<i>"Manuel des Operations d'urgence au titre de la Composante 5 du projet Niger LIRE"</i>) and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</li> </ul>	<ul> <li>a) The CERC manual which has been elaborated under the parent project will also be applicable to the activities added through this Additional Financing.</li> <li>b) Adopt any required E&amp;S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</li> </ul>	PCU
1.6	<ul> <li>THIRD PARTY MONITORING (TPM)</li> <li>In areas affected by higher degrees of insecurity and/or SEA/SH risks, based on its mission and area of expertise, the TPM shall be engaged to visit and monitor the entire Project area and prepare and submit monitoring reports:</li> <li>(i) The TPM monitoring consultant must be appointed with terms of reference, qualifications and experience acceptable to the Association;</li> <li>(ii) The Recipient shall require the TPM consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association; and</li> </ul>	Based on the assessment of the security situation and SEA/SH risks during the implementation of the project, if necessary, an agreement will be signed between the PCU and the TPM describing responsibilities, duration and expected results. The request for activation of the Third Party Monitoring will be initiated by the	PCU (Coordinator, Environmental and Social Safeguards Specialists).

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	(iii) The Recipient shall promptly take any action that may be requested by the Association after reviewing the reports of the TPM consultants.	Recipient after consultation and obtaining the No Objection from the Association.	
	An agreement must be signed between the PCU and the TPM describing responsibilities, duration and expected results. TPM engagements, if contracted, shall include a specialist to assess the quality and adequacy of the implementation of mitigation measures and responses to security and SEA/SH risks included in the Project ESMF and ESMP(s) and the project's SMP and Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risk Management and Mitigation Action Plan.		
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project, 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.	The LMP adopted on 05/19/2021, will be updated consulted, disclosed, and adopted prior to project appraisal, and thereafter implemented throughout Project implementation.	PCU, Suppliers and Providers
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	The mechanism that has been established under the Parent Project will be maintained until the new GM for project workers for new construction works under component 6 of the Additional Financing is operationalized. The new GM for project workers shall be established and made operational no later than three (3) months after the signing of contracts and maintained throughout the implementation of the Project.	PCU, Suppliers and Providers
2.3.	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Implement and integrate into the Project's bidding documents, Terms of Reference and contractor/subcontractor contracts, the Occupational Health and Safety (OHS) clauses specified in the Project's ESMF, the LMP, the SRA and SMP and any other OHS measures recommended by the ESMP specific to the subprojects. Thereafter, ensure that the Project's suppliers/contractors comply with these OHS measures.	Before the start of work and prior to issuing the notice of expression of interest for suppliers/contractors (integration of OHS measures).	PCU, Suppliers and Providers

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
		Ensure compliance with OHS measures	
		throughout the implementation of the	
		Project.	
ESS 3:	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.	The Parent Project's Waste Electrical and Electronic Equipment Management Plan (WEEEMP) shall be updated and extended to be a full WMP as necessary, consulted and disclosed prior to the commencement of relevant Project activities (i.e. infrastructure works added through the Additional Financing) and the measures shall be implemented throughout the Project implementation period.	Project Coordination Unit (PCU); PCU Environmental and Social Safeguards Specialists
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 3.1 above.	Same time frame as for ESMP adoption and implementation.	PCU; suppliers and providers
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 3.1 above.	Same time frame as for ESMP adoption and implementation.	PCU; suppliers and providers
4.2	COMMUNITY HEALTH AND SAFETY 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, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same time frame as for ESMP adoption and implementation.	PCU; suppliers and providers
4.3	SEA AND SH RISKS	Same timeframe as outlined in section 1.2 and implementation of the Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risk Management and Mitigation Action Plan throughout project implementation.	PCU; suppliers and providers

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Recipient shall update, disclose, consult upon, adopt, and implement a Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risk Management and Mitigation Action Plan that includes a number of measures including, but not limited to, ongoing identification of SEA/SH risks, awareness-raising activities, community consultations, training for project workers, the signing of a code of conduct prohibiting and sanctioning acts of SEA/SH by all project actors (project workers and other actors, including government civil servants working in connection with the project but whose employment is not legally transferred to the project), the recruitment of a GBV specialist and a GBV service provider (GBV NGO) in accordance with terms of reference acceptable to the Association, the budget allocation for the implementation of these measures and details on GBV awareness campaigns for all project stakeholders.		
	The Recipient shall ensure that all tender documents, works contracts or service contracts within the framework of the project require contractors/suppliers, subcontractors or consultants to adopt a code of conduct which will be signed by all workers and include training to this end. This code of conduct shall apply to contracts or services, commissioned or performed under such contracts or agreements and shall cover, among other things, child labor and SEA/SH.		
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 as defined in the ESMP/ESIA, the ESMC-C, or the Security Management Plan (SMP) guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel, all consistent with ESS4.	An SRA shall be conducted and a SMP shall be prepared prior to project appraisal. The summary of the SMP shall be disclosed prior to project appraisal. The SMP shall then be applied throughout the implementation of the Project.	PCU; suppliers and providers
4.5	SECURITY PERSONNEL The Recipient shall ensure that contractors/suppliers/service providers who use security services for their personnel and property : - Prioritize the use of the existing guarding services in the project area. - Ensure that security personnel receive training prior to deployment and on a regular basis, acceptable to the Association.	Throughout project implementation.	PCU; suppliers and providers

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Before using security personnel to protect project workers and assets, the Recipient shall ensure that: (i) their background has been properly vetted to ensure that such personnel have not engaged in illegal or threatening behavior, including, but not limited to, gender- based violence or excessive use of force; and (ii) such personnel have been properly instructed and trained prior to deployment and on a regular basis, including on the use of force and appropriate conduct/behavior, in a manner acceptable to the Association and further described in the project implementation manual and the SMP.		
<b>SC E-</b>	Ensure that any concerns or grievances regarding the conduct of the security personnel are received, monitored, and documented (taking into account the need to protect confidentiality) by the Project's grievance mechanism (see action 10.2 below), which shall facilitate its resolution, in accordance with ESS4 and ESS10. The Recipient shall promptly investigate all allegations of illegal or threatening acts committed by security personnel deployed to protect project personnel and property, take the necessary measures (or urge the appropriate authorities to take them) to prevent any recurrence of such acts. The Recipient shall report the said acts to the competent authorities and notify the Association after receiving the concern or grievance, as set out under action B above.		
5.1	RESETTLEMENT POLICY FRAMEWORK	Prior to project appraisal and thereafter	PCU (Coordinator,
5.1	Prepare, disclose, consult upon, adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	implement throughout project implementation.	Environmental and Social Safeguards Specialists).
5.2	RESETTLEMENT PLANS Prepare, disclose, consult upon, adopt and implement a resettlement action plan (RAP) as set out in the RPF and consistent with ESS5.	Prepare, disclose, consult upon, adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	PCU (Coordinator, Environmental and Social Safeguards Specialists).
SS 6:	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RE	SOURCES	
OT CL	IRRENTLY RELEVANT.		
S 7: I	NDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITION	AL LOCAL COMMUNITIES	
JT CL	IRRENTLY RELEVANT.		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY	
ESS 8: 0	CULTURAL HERITAGE			
8.1	CHANCE FINDS Describe and implement the chance finds procedures as described by Ensure that chance finds procedures are incorporated into all employ including those where the probability is extremely low.	ment contracts,	The adopted and disclosed Parent Project ESMF on 03/16/2020 will be updated, adopted, and disclosed no later than prior to Appraisal.	PCU and Consultants.
	FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects	involving Financial II	ntermediaries (FIs).]	
	PPLICABLE.			
	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENT Prepare, disclose, consult upon, adopt and implement a Stakeholder E (SEP) for the Project, consistent with ESS10, which shall include measu provide stakeholders with timely, relevant, understandable and acces and consult with them in a culturally appropriate manner, which is free interference, coercion, discrimination and intimidation.	Engagement Plan ures to, inter alia, sible information,	The Parent Project SEP adopted and disclosed on March 16, 2020 shall be updated, consulted and disclosed prio to project appraisal.	PCU
10.2	PROJECT GRIEVANCE MECHANISM		/	
	Establish, publicize, maintain, and operate an accessible grievance me receive and facilitate resolution of concerns and grievances in relation promptly and effectively, in a transparent manner that is culturally ap readily accessible to all Project-affected parties, at no cost and withou including concerns and grievances filed anonymously, in a manner con ESS10.	n to the Project, propriate and ut retribution,	The parent project GRM is already operational and will be updated/expanded with regards to the additional activities of the AF; it will be maintained throughout the implementation of the Project.	. ,
	The grievance mechanism shall be equipped to receive, register, and for resolution of SEA/SH complaints, including through the referral of surgender-based violence service providers, all in a safe, confidential, and manner.	vivors to relevant		
CAPAC	ITY SUPPORT			
CS1	<ul> <li>Train project workers (including PIU staff), stakeholders, partners</li> <li>(e.g. relevant UN agencies and NGOs, service providers and other implementing actors, as applicable, on the following topics: <ul> <li>Specific aspects of environmental and social assessment</li> <li>The ESF and the requirements of each standard</li> <li>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</li> <li>ESS. 2: Labor and Working Conditions</li> </ul> </li> </ul>	Within 90 days of t the implementatio	he AF Effective Date and throughout n of the Project	National Environmental Assessment Office – " Bureau Nationale pour l'évaluation environnementale" (BNEE) in Niger; technical services/implementing partners; PCU (environmental and social safeguards specialists, technical

<ul> <li>Identification and involvement of stakeholders</li> <li>Content of the ESCP</li> <li>Content of the ESMP and RAP</li> <li>Content of the SEP</li> <li>Project GM</li> <li>Code of Conduct</li> <li>Mitigation and management of the risks of sexual exploitation and abuse (SEA) and sexual harassment (SH) and development and implementation of the Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risk Management and Mitigation Action Plan.</li> <li>CS2</li> <li>Training will be organized for construction workers and staff as well as local populations on the following themes:         <ul> <li>Personal Protective Equipment (PPE)</li> <li>Workplace Risk Management</li> <li>Prevention of accidents at work</li> <li>Health, safety and environmental regulations</li> <li>Solid and liquid waste management</li> <li>Emergency preparedness and response</li> <li>STI/HIV/AIDS Awareness</li> <li>SEA/SH risk awareness, codes of conduct, LMP, available GBV services and other mitigation measures put in place by</li> </ul> </li> </ul>	Within 90 days after the effectiveness date of the additional financing and throughout the implementation of the project. To increase efficiency, members of GRM Committees will be trained locally and prior to the start of work. For manual labor staff, they will be trained on complaint management directly on the sites, 10 days before the start of the work.	specialists), local authorities, communities, relevant public services, civil society, etc. BNEE, technical services, PCU (environmental and social safeguards specialists, technical specialists), local authorities, etc.
the project for both workers and the community.CS3Training on GBV/SEA/SH risk awareness, prevention and response mitigation measures and FGM will be organized for all staff involved in the implementation of project activities, including (i) coaches for teachers recruited under component 1.2 of the project; (ii) child protection committees (at departmental, commune and village levels); (iii) project staff involved in the MGP and (iv) certain primary and secondary school teachers including boarding schools and other consultants and contractors recruited.	Within 90 days after the project effectiveness date and throughout the implementation of the project.	The Consultant/service provider in charge of the preparation and implementation of the action plan in collaboration with the OCU social safeguards specialist.