

FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF EDUCATION, CULTURE AND HIGHER EDUCATION

**SOMALIA EDUCATION FOR HUMAN CAPITAL DEVELOPMENT
PROJECT (P172434)**

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

3rd March 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (“Recipient”), through its Ministry of Education, Culture and Higher Education (MoECHE) at Federal and Member state level will implement the **Somalia Education for Human Capital Development Project** (hereinafter known as “**the Project**”). The International Development Association (IDA, hereinafter “**the Association**”) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank. 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 E&S documents required under the ESF and referred to in this ESCP, including:
 - a. Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), which has been prepared for the Somalia Education for Human Capital Development Project; and
 - b. Labor Management Procedures (LMP), Security Management [Framework and Project wide and Area Based Security Risk Assessments and Management](#) Plans and GBV Action Plan, which will be prepared for subprojects of the Somalia Education for Human Capital Development Project and the timelines specified in those E&S documents.
4. The Recipient 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 Recipient 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 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 assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient through the minister responsible for MoECHE 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 Recipient through the minister responsible for MoECHE. The MoECHE will promptly disclose the updated ESCP on its publicly accessible website.
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, which may include environmental, health, and safety impacts, labor influx, gender-based violence (GBV) or sexual exploitation and abuse (SEA).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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 documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance mechanism(s).</p>	<p>Quarterly throughout project implementation.</p> <p>Focal points for the Federal Member States will report to the Project Management Unit (PMU) on a monthly basis.</p>	PMU
B	<p>INCIDENTS AND ACCIDENTS NOTIFICATION</p> <p>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. Provide sufficient details 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.</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>Notify the Association within five 5 days of the occurrence of ? 24 hours after learning of an incident or accident.</p> <p>A report would be provided within a timeframe acceptable to the Association, as requested.</p> <p>Report all other incidents and accidents to the Association in quarterly reports.</p>	PMU
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>As per the Association's request, provide to the Association the contractors' and design and supervision consultants' monthly monitoring reports on E&S implementation submitted to the PMU.</p>	<p>Upon request by the Association.</p>	PMU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure at Federal Government of Somalia (FGS) level with qualified staff and resources to support management of E&S risks including appointing within the PMU, an Environmental Specialist, GBV specialist and Social Specialist <u>and a security specialist</u> - each with more than eight (8) years of experience in carrying out environmental and social assessments of infrastructure projects - to be full time dedicated to the project.</p> <p>Establish and maintain an organizational structure at Federal Member State (FMS-) level with qualified staff and resources to support management of E&S risks including appointing within the PIU, a full time social and GBV specialist to be based in the districts where construction is being carried out, each with more than five (5) years of experience in carrying out environmental and social assessments of infrastructure projects.</p> <p><u>Contract a certified security risk management firm to develop a project security assessment and management plan and areas risk assessments and plans and provide support throughout the project</u></p>	<p>Prior to effectiveness</p> <p>Prior to disbursement for activities under component 2 &3.</p> <p><u>3 months after effectiveness</u></p>	<p>PMU</p> <p>PIU</p> <p><u>PMU</u></p>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>In accordance with the screening procedures enumerated in the Environmental and Social Management Framework (ESMF) for this project, undertake site-specific environmental and social risk screening and impact assessments for subprojects including assessment of the physical environment, location of schools, availability of suitable land free of encumbrances and contestation, ensuring equity and inclusivity of site selections - as well as capacity of likely contractors to implement ESMPs and monitoring arrangements.</p>	<p>Prior to implementation of site-specific subprojects.</p>	<p>PMU and PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Prepare, adopt and publicly disclose, sub-project construction and operation Environmental and Social Management Plans (ESMPs) as specified in the ESMF screening criteria, in a manner satisfactory to the Association.</p> <p>Update project wide SEP as necessary, and publicly disclose and implement, including GRM and inclusion plan satisfactory to the Association.</p> <p><u>Prepare a project Security Management Framework.</u></p> <p>Prepare a project wide GBV Action Plan, <u>Labour Management Procedures MP, Security Management Plan- project wide Security Risk Assessment and Management Plan.</u></p> <p>Prepare, adopt and publicly disclose site-specific construction and operation ESMPs as well as Resettlement and Livelihood Plans as necessary in line with the screening and assessment guidelines provided in the ESMF including required elements of the GBV Action Plan, LMPs, <u>Area Security Risk Assessment and Management Plan, RPF.</u></p>	<p>Before implementation of sub-projects, and before beginning of new school calendars for new schools</p> <p>As needed throughout the project</p> <p>Prior to disbursement for activities under components 2&3.</p> <p><u>Prior to construction of each school</u></p>	<p>PMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.4 MANAGEMENT OF CONTRACTORS: Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management <u>Procedures</u> and Security <u>Management Plans</u> 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>Develop and implement procedures for managing contractors and subcontractors recruited to carry out civil works including:</p> <ul style="list-style-type: none"> • Ensure compliance with the national laws, e.g. licenses to operate and excavate any sites for project purposes; • Relevant environmental and social requirements will be included in the procurement and contracting process including bidding documents, contracts and subcontracts consistent with the requirements of ESSs; • The contractors will submit an ESMP including all E&S requirements as part of the bidding process and show that they have sufficient staff and capacity to carry it out; • Codes of conduct (CoCs) are required for contractors, subcontractors, primary suppliers and their workers covering conditions of service, OHS, GBV and security requirements; • Preparation of a detailed contractor-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&S risks; • Monitor contractor commitment and compliance with ESSs; • Provide GRM for contractor and subcontractor, primary suppliers, communities and other stakeholders as well as employees; • Ensure contractors and primary suppliers provide details on their oversight on environmental, social, health and safety (ESHS) performance and adequate mechanisms for serious incident reporting should it be required; and • Monitor the performance of the contractors and primary suppliers to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the LMP, GBV Action Plan, and Security Management Plan. 	<p>Prior to the preparation of procurement documents.</p> <p>Supervise contractors throughout Project implementation</p>	<p>PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP)</p> <p>Develop LMP to address labor risks, including (but not limited to)</p> <ul style="list-style-type: none"> ▪ conditions of service; ▪ code of conduct; ▪ occupational, health and safety (OHS) measures; ▪ Covid-19 prevention measures; ▪ prevention of child and forced labor; ▪ emergency preparedness and response; ▪ grievance redress mechanism for project workers; ▪ training of project workers on key issues including OHS and GBV prevention; and ▪ management of labor influx. 	Prior to disbursement of components 2 and 3 , effectiveness.	PMU
2.2	<p>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS</p> <p>Develop and maintain a for direct project workers, including contracted and primary supply workers as part of the LMP as well as a separate confidential mechanism for GBV/SEAH complaints.</p>	Grievance redress mechanism to be operational prior to engaging Project workers. The mechanism to be maintained throughout Project implementation.	PMU
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the ESMF including through, inter alia, implementing adequate OHS measures and incorporating Labour Management and Security Management Plan procedures and GBV Action Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Measures to be operational prior to engaging Project workers.	PMU

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMPs to be prepared under the clause 1.3 above.	Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects. Monitor implementation of the ESMPs throughout Project implementation.	PMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY: Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities , including risks of labor influx; risk of exposure to infectious diseases (including COVID-19 and HIV/AIDS); response to emergency situations due to conflict or natural disasters, construction and structural safety risks, as well as traffic and road safety risks, and include these measures and actions in the ESMPs to be prepared in accordance with the ESMF , in a manner acceptable to the Association. Ensure that the new schools to be upgraded under this Project are designed and modelled on the Safe School Standards, with provision of adequate access to potable water and sanitation in schools for children and their teachers, ensure that indoor air quality (IAQ) is in compliance with World Health Organisation guidelines, eliminate smoking in schools and ensure that children can safely walk to the schools.	Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects Monitor implementation throughout Project implementation.	PMU

<p>4.2</p>	<p>GBV AND SEA RISKS: Prepare, adopt, publicly disclose and implement a stand-alone project-wide GBV Action Plan.</p> <p>Key measures include:</p> <ul style="list-style-type: none"> ▪ CoCs for project and contracted workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEA provisions; ▪ Mapping and development of partnerships with identified GBV service providers; ▪ A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response; ▪ An Accountability Framework that outlines how the PMU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators; and ▪ Establishment of special channel/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward. <p>Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace.</p> <p>Clarification of GBV requirements in bidding documents including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract.</p> <p>Bid evaluations to include consideration for GBV response proposals. Identification of a Third-Party Monitoring to track implementation and management of GBV risks.</p> <p>Ensuring additional funds are made available to implement measures to address GBV/SEA risks and impacts that may arise during Project implementation.</p>	<p>Prepare, adopt and publicly disclose the GBV Action Plan Prior to disbursement for activities under components 2&3.</p> <p>Implement the GBV Action Plan throughout Project implementation.</p>	<p>PMU</p>
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4.3	<p>SECURITY PERSONNEL:</p> <p><u>Prepare, adopt, and implement a Project wide Security Management Framework consistent with the requirements of ESS4, in a manner acceptable to the Bank.</u></p> <p>Prepare, adopt, and implement a Project wide stand-alone Security Personnel Risk Assessment and Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p>	<p><u>Prior to effectiveness</u></p> <p>Prepare and adopt <u>and clear a the</u> Security Management Plan prior to disbursement for activities under components 2&3.</p>	PMU
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ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

5.1	<p>RESETTLEMENT ACTION PLANS:</p> <p>Prepare, consult on, adopt and disclose a Resettlement Planning Framework (RPF):</p> <ul style="list-style-type: none"> • Prepare, adopt and publicly disclose, Resettlement and Livelihood Restoration Plans (RPs and LPs) and land agreements in accordance with ESS5 and consistent with the requirements of the RPF; and • Thereafter, implement the respective RPs and LPs, in a manner acceptable to the Association. 	<p>To be cleared and disclosed by the Association prior to disbursement for activities under component 2. Prior to site specific displacement, restriction on land use or land acquisition.</p> <p>Prior to construction activities.</p>	PMU
5.2	<p>FORCED DISPLACEMENT PRIOR TO PROJECT APPROVAL:</p> <p>Should involuntary resettlement should displacement occur in anticipation of construction or in any other project-financed infrastructure before board approval of the Project, relevant ESS5 requirements will be applied retroactively.</p> <p>If such requirements cannot be satisfied retroactively, the Bank will not support such schools, or any other infrastructure development carried out.</p>	<p>Identification of such prior forced displacement when conducting screening and census survey during the RP process of subprojects.</p>	PMU

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

6.1	<p>BIODIVERSITY RISKS AND IMPACTS: Consistent with the ESMF, ensure that ESS6-related measures are included in the ESMPs for subprojects, and that such measures are adopted and implemented in a manner acceptable to the Association.</p>	<p>Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects.</p> <p>Carry out the ESMP throughout Project implementation.</p>	
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is not relevant, as there are no persons that meet the identification criteria for IP/SSAHUTLCs			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE AND CHANCE FINDS: Consistent with the ESMF ensure that ESS8 related measures are included in the environmental and social management plans (ESMPs) for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.</p> <p>Prepare, adopt, and implement - if applicable - the chance finds procedure described in the ESMPs developed for sub-projects.</p>	<p>Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects</p> <p>Carry out the ESMPs, including complying with chance finds procedures, throughout Project implementation.</p>	PMU
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant to the project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION: Update, disclose and implement a SEP, in a manner acceptable to the Association.</p>	<p>SEP already prepared.</p> <p>To be updated regularly throughout Project implementation.</p>	PMU
10.2	<p>PROJECT GRIEVANCE MECHANISM: Ensure a functioning, trusted and accessible Project GRM, in line with the SEP.</p> <p>Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.</p>	<p>Prior to disbursement for activities under components 2&3.</p>	PMU
CAPACITY SUPPORT (TRAINING)			

<p>CS1</p>	<p>A preliminary capacity assessment for the implementation of the E&S requirements has been carried out as part of the ESMF preparation and will be updated as necessary following the recruitment and induction of E&S specialists. The capacity assessment will include terms of reference, an action plan and timeline for capacity building activities, including training and mentorship, in the following areas:</p> <ul style="list-style-type: none"> • The World Bank’s ESF in general; • Stakeholder mapping and engagement; • Occupational and Community Health and Safety issues (such as OHS measures in school rehabilitation, construction and maintenance); • Labour management plans; • Specific aspects of environmental and social assessment including preparation of E&S instruments such as ESMPs, RPs and LPs, GBV Action Plans, Security Management Plans; • Gender Based Violence (GBV); and • GRM. <p>Targeted groups will include the following:</p> <ul style="list-style-type: none"> • PMU in the MoECHE; • State level PIU; • Contractors/subcontractors/primary suppliers and their project workers; • School-based community education committees (CECs); • Third party monitors; • Beneficiary communities; and • Key stakeholders. 	<p>Prior to disbursement for activities under components 2&3.</p> <p>Training will be carried out throughout the project as required.</p>	<p>PMU</p>
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