

# Republic of Ghana/Ministry of Education

## Ghana Accountability for Learning Outcomes Project (P165557), First Additional Financing (P 173282) and Second Additional Financing (P165557)

Negotiated

### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

December 10, 2024

**Republic of Ghana/Ministry of Education**  
**Ghana Accountability for Learning Outcomes Project Second Additional Financing**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Republic of Ghana (the Recipient) is implementing the Ghana Accountability for Learning Outcomes Project (the Project), with the involvement of the Ministry of Education (MOE) and the Ghana Education Service (GES), as set out in the Financing Agreement (as amended), the GPE Grant Agreement (as amended), the GPRBA Grant Agreement, the GPE COVID-19 Accelerated Funding Grant Agreement, the GPE Grant Agreement 2 and the Early Learning Partnership Multi-Donor Trust Fund (ELP MDTF) Grant Agreement (together, the Agreements). The International Development Association (IDA), International Bank for Reconstruction and Development (IBRD) (acting as the grant agent for the Global Partnership for Education (GPE) Trust Fund), and IDA (acting as administrator for the Global Partnership for Results-Based Approaches (GPRBA)), provided original (P165557) and first additional financing (P173282) for the Project, and presently IBRD (acting as grant agent for the GPE Trust Fund) and IBRD & IDA (acting jointly as administrator for the ELP MDTF), have agreed to provide a second additional financing for the Project, as set out in the Agreements. This Environmental and Social Commitment Plan (ESCP) supersedes previous versions of the ESCP for the Project and shall apply to the original, first additional financing and second additional financing for the 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 ESCP, in a manner acceptable to the Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
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 ESSs, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank 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 MOE, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Chief Director of MOE. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank 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&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p>	<p>Submit six-monthly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than five (5) days after the end of each reporting period.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the 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, 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.</p> <p>Subsequently, at the Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>An incident report with root cause analysis and corrective actions shall be provided to the Bank within 30 days from the time of the incident unless a different timeframe is agreed with the Bank.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
C	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>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 Bank.</p>	<p>Submit the monthly reports to the Bank upon request throughout the Project's implementation period starting from the Effective Date.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<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 the PTT as set out in the Financing Agreement.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Establish and maintain a Project Technical Team (PTT), with qualified staff and resources to support management of ESHS risks and impacts of the Project including the existing Environmental Specialist and a Social Development and Gender Specialist (position to be recruited), with representation in the senior management, to have overall accountability for the environmental and social performance.</p>	<p>Maintain the existing Environmental Specialist position throughout Project implementation.</p> <p>Recruit a Social Development and Gender Specialist not later than 3 months after the Project Effective Date of the second additional financing and thereafter maintain this position throughout Project implementation.</p>	
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Adopt and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>2. Screen subproject activities and specific sub-project locations in accordance with the ESMF. Prepare, adopt, disclose, and implement necessary site-specific instruments such as an Environmental and Social Impact Assessment (ESIA), an Environmental and Social Management Plan (ESMP), E&amp;S Audit etc., as needed, consistent with the relevant ESSs and as set out in the ESMF. For such site-specific instruments, submit relevant terms of reference (TORs) for the preparation of these instruments to the Bank for review and clearance.</p>	<p>1. The ESMF adopted in August 2020 for the original and first additional financing has been updated for the second additional financing and adopted on October 3, 2024. The updated ESMF would be implemented throughout Project implementation.</p> <p>2. Screen subproject activities and specific sub-project locations once they are identified for the Project and throughout Project implementation.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<p>3. Prior to carrying out a subproject activity that requires the adoption of site-specific instruments, submit relevant TORs for such instruments to the Bank for review and clearance, and upon clearance, prepare, consult upon, submit for the Bank's clearance, and disclose the instruments. Adopt the instruments before launching the bidding process for the respective Project activity, prior to carrying out of subproject activity that requires the adoption of such instruments. Once adopted, implement the respective instruments throughout Project implementation.</p>	
<p>1.3 <b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures in the updated ESMF, 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.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<p>1.4 <b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility 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 Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<p>1.5 <b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Manual as specified in the Agreements includes a description of the ESHS assessment and management arrangements including CERC-ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of the CERC component, in accordance with the ESSs.</p>	<p>a) The adoption of the CERC Manual in form and substance acceptable to the Bank is a withdrawal condition under Section III.B. of Schedule 2 of the</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC component of the Project, in accordance with the CERC Manual and CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	Agreements for the Project.  b) Adopt any required E&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&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b>  Adopt and implement the Labor Management Procedures (LMP) incorporated in the updated ESMF 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.	Same timeframe as for adoption and implementation of updated ESMF in action 1.2 above.	<i>Project Technical Team (PTT) of MOE</i>
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>  Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Maintain and operate the grievance mechanism established under the original and first additional financing throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b>  Adopt and implement the Electronic Waste (e-waste) Management Plan (EWMP) for the Project, to manage e-wastes, consistent with ESS3.	Continue to implement the EWMP adopted in July 2024 throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>  Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP in action 1.2 above.	<i>Project Technical Team (PTT) of MOE</i>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP.	<i>Project Technical Team (PTT) of MOE</i>
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities 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 timeframe as for the adoption and implementation of the ESMPs.	<i>Project Technical Team (PTT) of MOE</i>
4.3	<b>SEA AND SH RISKS</b> Adopt and implement the Action Plan for Prevention Against Abuse and Sexual Exploitation (PAASE) developed for the Project.	The PAASE was adopted in November 2021 and will continuously be implemented throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT POLICY FRAMEWORK</b> Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	The RPF was adopted in August 2020 and shall be implemented throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
5.2	<b>RESETTLEMENT PLANS</b> Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided, and as applicable, displaced people have been resettled and moving allowances have been provided.	<i>Project Technical Team (PTT) of MOE</i>
5.3	<b>GRIEVANCE MECHANISM</b> Continue implementing the Grievance Mechanism as described in the SEP and referred to in action 10.1 below for resolution of grievances related to land acquisition and involuntary resettlement.	Throughout project implementation	<i>Project Technical Team (PTT) of MOE</i>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	This standard is not relevant to this Project.		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	This standard is not relevant to this Project.		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS</b>  Continue implementing the chance find procedures provided in the updated ESMF of the Project.	Throughout project implementation	<i>Project Technical Team (PTT) of MOE</i>
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	This standard is not relevant to this Project.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>  Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	The SEP adopted in August 2020 for the original financing and first additional financing has been updated for the second additional financing and adopted on October 3, 2024. The updated SEP shall be implemented throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
10.2	<b>PROJECT GRIEVANCE MECHANISM</b>  Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.  The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Maintain and operate the grievance mechanism established for the original financing and first additional financing throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
<b>CAPACITY SUPPORT</b>			
CS1	Continue training of Implementing Agencies (IAs), contractors, consultants, service providers, staff of district offices of education, staff of regional offices of education and project workers on the following which could be expanded as required:		<i>Project Technical Team (PTT) of MOE</i>



MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> <li>• Electronic waste (e-waste) management plan</li> <li>• Action Plan on PAASE</li> <li>• Grievance Mechanism</li> <li>• Emergency preparedness and response</li> <li>• Community health and safety</li> <li>• Stakeholder mapping and engagement</li> <li>• Subproject Environmental and Social screening</li> <li>• Monitoring and Reporting</li> <li>• SEA/SH Risk Mitigation and child rights protection</li> <li>• Disability equality training</li> <li>• Climate smart actions in schools</li> <li>• Inclusion</li> </ul>		
<p>CS2</p> <p>Continue training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations:</p>		<p><i>Project Technical Team (PTT) of MOE</i></p>