

**The Kingdom of Bhutan
Human Capital Recovery and Resilience Program
(HCRRP)
Additional Financing (P179184)**

**Draft
ENVIRONMENTAL AND SOCIAL COMMITMENT
PLAN (ESCP)**

May 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Bhutan (the Recipient) is implementing the Human Capital Recovery and Resilience Program (the Program), with the involvement of the Ministry of Education and Skills Development (MoESD), as set out in the Grant Agreement. The International Development Association (the Association, acting as the administrator of Global Partnership for Education (GPE) has agreed to provide the original financing (P174399) and additional financing (P179184) for the Program, as set out in the Grant Agreement.
2. The Recipient shall ensure that the Program 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 Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Grant 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 Program implementation, to reflect adaptive management of changes and unforeseen circumstances or in response to 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's Secretary of Ministry of Finance. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental and social performance of the Project, including but not limited to the implementation of the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.</p>	<p>Submit six-monthly reports to the Association throughout Program implementation.</p> <p>Submit each report to the Association no later than 30 days after the last day of each period.</p>	<p>Implementing Agency (Planning Division under Ministry of Education and Skills Development)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Program 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 injuries. Provide sufficient details 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. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association within 24 hours of learning of the incident or accident. A detailed report will be provided within 96 hours including classification of incident. Carryout Root Cause Analysis (RCA) within 10 (ten) calendar days of the incidence. Develop Safeguard Corrective Action Plan (SCAP) and after approval from WB implement the same.</p>	<p>Implementing Agency (Planning Division under Ministry of Education and Skills Development)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Assign a single focal point to oversee and manage ESHS risks and impacts for the Implementing Agency covering both Environmental and Social issues.</p>	<p>Assigning the focal point will be completed within 2 months from effectiveness with institution of project focal on contract basis in PMU.</p>	<p>Implementing Agency (Planning Division under Ministry of Education and Skills Development)</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>A screening of the activities under IPF has been carried out. The Implementing Agency would need to follow the provisions of the ESCP.</p>	<p>Conduct screening and prepare E&S instruments as required prior to commencing activities. Once adopted, implement respective E&S instruments throughout implementation of the program through PMU.</p>	<p>Implementing Agency (Planning Division under Ministry of Education and Skills Development)</p>
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms</p>	<p>Throughout the implementation</p>	<p>Implementing Agency (ECCD and SEN Division of Ministry of Education and Skills Development)</p>

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	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.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMPs) set out in this ESCP, and consistent with ESS 2.</p> <p>The project will engage government civil servants under the government employment rules and some part of ESS2 (such as the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety) would still be applicable to them. There would also be individual consultants for the Project. Contracted workers will also be working under the consulting firms. The Implementing Agency would ensure that workers are engaged and dealt during implementation of the project activities in line with the provisions of ESS2. To this end, ensure that the following measures are carried out:</p> <p>a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable;</p> <p>b) Implement occupational health and safety measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry specific EHSGs and other Good International Industry Practice (GIIP);</p> <p>c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions;</p>	Adopt the LMP before the assignment of workers and thereafter implement throughout Program implementation	Implementing Agency (ECCD & SEN division, School Liaison and Coordination Division (SLCD), Health and Wellbeing Division (HWD), Ministry of Education and Skills Development)

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	<p>d) Implement a code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases; safeguard against workplace harassment, that promotes non-discrimination and equal opportunity for all and</p> <p>e) Follow COVID-19 related protocols, including mandatory use of mask, safe distancing, washing of hands, temperature checking, referral to health service upon symptoms etc.</p>		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Follow the national GRS, in a manner consistent with ESS2 that includes:</p> <p>a) A channel for workers to raise grievances without fear of retaliation</p> <p>b) A mechanism to uptake, solve, manage and implement redressal measure</p> <p>c) A mechanism to disseminate information of the existence of such mechanism to all project personnel.</p>	Implement before assignment of project workers and thereafter maintain throughout the implementation of the program	Implementing Agency (Human Resource Division of Ministry of Education and Skills Development)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Not Relevant		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from activities, especially the spread of COVID and implement the mitigation measures in accordance with national regulations and the COVID Protocol, consistent with the requirements of ESS 4. The Protocol includes use of mask, washing of hands, monitoring of temperature, ensuring COVID vaccination and reporting of COVID symptoms to nearest health centers for all project personnel and the community members they interact with.</p>	Implement protocol from the beginning of project activities and maintain throughout implementation	Implementing Agency (ECCD & SEN Division, School Liaison and Coordination Division (SLCD), Health and Wellbeing Division (HWD) under Ministry of Education and Skills Development)
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK Not Relevant</p>		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS Not Relevant</p>		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES PLANNING FRAMEWORK Not Relevant</p>		

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ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Not Relevant		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not Relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP), consistent with ESS 10, which shall include the below 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 from manipulation, interference, coercion, discrimination and intimidation.</p> <p>Identification of stakeholders, including the affected and interested parties (government and NGO, think tanks, beneficiaries, academics), the vulnerable and the disadvantaged</p> <p>Continuously engage and consult with the stakeholder at appropriate time and place to provide project related information including ES risks and impacts and seek their input and feedback in a culturally appropriate and safe manner without coercion, discrimination, intimidation or fear of retaliation</p> <p>Design project activities as per the stakeholder inputs and report back to them to complete the feedback loop in a culturally appropriate and timely manner</p> <p>Remove obstacles to participation and ensure views of differently affected groups are captured</p>	Stakeholder Consultation and engagement begins from project preparation and continue throughout the implementation	Implementing Agency (ECCD & SEN Division, School Liaison and Coordination Division (SLCD), Health and Wellbeing Division (HWD) under Ministry of Education and Skills Development)
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>The ES focal point will receive grievances through various channels (phone, SMS, email etc.) and administer the grievance redress with directive from the Implementing Agency. In case of SEA/SH, the grievance mechanism should record a minimum of three elements related to a SEA/SH allegation to protect the survivor's confidentiality: (i) the allegation in the survivor's own words; (ii) if the alleged</p>	Adopt the GRM before the beginning of activities and thereafter continue throughout Program implementation	Implementing Agency (Policy and Planning Division (PPD) and Human Resource Division (HRD) under Ministry of Education and Skills Development)

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	<p>perpetrator is, to the best of the survivor’s knowledge, related to the project; and, if possible, (iii) the age and sex of the survivor.</p> <p>The GRM operator should provide minimal information to the implementing agency, which should then notify the Bank task team. This includes: (i) the nature of the case; (ii) if the case is project-related; (iii) the age and sex of the survivor (if available); and (iv) if the survivor was referred to services.</p> <p>The IA will also use the already established grievance management system e-KaaSel (central grievance handling system) to receive grievances. The IA will receive grievances from these sources 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.). For SEA/SH related complaints, the IA will adopt Bhutan’s National Commission for Women and Children (NCWC), One Stop Crisis Center, Respect, Educate, Nurture and Empower Women (RENEW) initiative and Royal Bhutan Police (RBP)’s existing system in a safe, confidential and survivor-centric manner, respecting the desire and decision of the survivor.</p>		
CAPACITY SUPPORT			
CS1	<p>Following types of training will be provided to the relevant target groups, such as Program staff, stakeholder community, workers, consultants:</p> <ol style="list-style-type: none"> 1. Introduction to World Bank ESF guidelines and ESMF 2. Stakeholder Engagement 3. Issues related to COVID-19: use of PPE; working in COVID-19 environment; WHO, CDC and national guidelines on quarantine; compliance with local rules and regulations. 4. Emergency procedure and response 5. Training on GBV/SEA/SH 	<p>Training of staff to be completed within 6 months of Effectiveness and thereafter yearly once.</p>	<p>Implementing Agency (Policy and Planning Division (PPD) under Ministry of Education and Skills Development)</p>