Higher Education Acceleration

and Transformation Project

(P168961)

Environmental and Social

Commitment Plan

Bangladesh & Afghanistan

Prepared by:

University Grants Commission (UGC),

Ministry of Education (MoE), Bangladesh

&

Ministry of Higher Education (MoHE), Afghanistan

October 2020



**Higher Education Acceleration and Transformation Project**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Government of People’s Republic of Bangladesh (GoB) (the **Recipient**) will implement the Higher Education Acceleration and Transformation Project (the **Project**), with the involvement of Secondary and Higher Education Division (SHED) under Ministry of Education (**MoE**) and University Grants Commission (**UGC**). The International Development Association, IDA (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 (the Bank) representing the Association. 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, such as Environmental and Social Management Plans (ESMP), Resettlement Policy Framework (RPF), Indigenous People Planning Framework (IPPF), Labor Management Procedure (LMP), and Stakeholder Engagement Plan (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 implementation of specific measures and actions is conducted by the MOE and UGC 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 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. The Recipient will 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.

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| **MATERIAL MEASURES AND ACTIONS**  | **TIMEFRAME** | **RESPONSIBILITY/AUTHORITY**  |
| **MONITORING AND REPORTING** |
| A | **REGULAR REPORTING**Prepare and submit to the Bank, regular monitoring reports on environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the following1. Environmental and Social Commitment Plan (ESCP)
2. Environmental and Social Management Plans (ESMPs, RAPs, SEP and LMP)
3. Compliance to Environmental and Social statutory requirements including status of Land Ownership for University Teachers’ Training Academy (UTTA) and other construction related activities, Department of Environment clearance;
4. Status of the grant research proposal environmental screening and ESMPs and implementation status;
5. Design modification or change in scope brought to Bank notice
6. Assessment of changes and updating/addendum to ESIA/ESMPs
7. Site observations on Contractor’s performance on Environmental Social Health and Safety (ESHS) and other plans in ESMPs
8. Summary of Stakeholder Engagement activities as stated in the SEP
9. Status on the feasibility studies including ESIA for UTTA and other sites during implementation
10. Summary of Grievances received and redressed for the project.
11. Status of staffing within Project Implementation Committee (PIC) under UGC and other implementation partners/agencies
12. Capacity building /training activities undertaken for different project functionaries
 | Every six months during the Project’s implementation in conjunction with the Project’s progress reports, or more frequently depending on the Progress review findings. The format will be agreed by the 1st Implementation Support Mission. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW, Research Grant receiving universities;Funding from the Project budget |
| B | **INCIDENTS AND ACCIDENTS**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 accidents that could result in fatalities, injuries, cases of GBV/SEA/SH, concerns of COVID-19 infections, serious mismanagement in handling waste, security breach, etc., 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. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.  | Notify the World Bank within 24 hours of learning of the accidents or incidents. A report on actions taken to be provided on the same by 07 (Seven) days of notifying the Bank. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW, Research Grant receiving universities;Funding from the Project budget. |
| C. | **CONTRACTORS MONTHLY REPORTS**Monthly progress report (MPR) prepared by contractors explaining the compliance status of the Project with the ESMPs. Details will include status on:1. Contractor’s ESMP (C-ESMP) implementation work plan
2. Implementation of Contractor’s ESMP (C-ESMP and related plans such as OHS Plan, Waste Management Plan, Workers’ Camp Management Plan, CHS Plan, Site Restoration Plan, traffic management plan etc.)
3. Status of Compliance with E&S statutory requirements (including Environmental clearance, land ownership permit, municipality permit, quarry permits, labor licenses, insurance, etc.)
4. Status on actions indicated in the Labor Management Procedure
5. ESHS incidents & supervision
6. Usage of Personal Protective Equipment (PPE) such as hard hats, safety shoes and safety vests by workers
7. Safety at work sites like providing traffic signage, barriers/delineator, management of traffic, drainage and pliable road surface etc.
8. Training conducted, and workers participation
9. Functioning of GRM relating to labor aspects, including summary details of Workers grievances
10. Community grievances
11. Corrective Actions and planned E&S activities for next month
12. In contracts for works using the Bank’s standard procurement
 | Monthly throughout project implementation to PIC & site owners, and universities;PIC, Environmental and Social Specialist will provide a summary of the status and submit to the Bank the compiled report half yearly. | Contractor and PIC (MoE, UGC, AUW) and participating universities |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| 1.1 | **ORGANIZATIONAL STRUCTURE** 1. MoE will recruit Chief Implementation Officer (CIO). The CIO will lead the Technical Assistance (TA) team. The CIO will be responsible for coordination of project activities under the guidance of PD. 2. UGC will recruit five specialists for the implementation and monitoring of the ESCP, ESMF, ESIA, RPF, IPPF, SEP for all components. A full time senior Environmental Specialist (ES)- responsible for addressing environmental risks/impacts ESMPs as well as waste management issues and implementation of the mitigation measures,, a Senior Social Development Specialist (SDS)- responsible for implementation of RPF and IPPF, a Labor and OHS Specialist- responsible for implementation of LMP and monitoring and ensuring application of COVID-19 protocol of Ministry of Education (MoE) and World Health Organization (WHO) with qualifications, a Gender and GBV Specialist responsible for implementation of GBV and GAP, and a consultation and communication specialist– responsible for implementation of SEP under terms of reference satisfactory to the Bank.3. In addition to the above 5 specialists, UGC will hire 01 full time environmental specialist and 01 full time Social Development Specialist on behalf of AUW. They will be responsible to (i) update and implement AUW ESIA and ESMP, (ii)compliance of ESMF requirement in any activities implemented by AUW including the infrastructure4. UGC will hire an E&S firm for preparing the training material on ESF for the professional training. 5. AUW will deploy 01 Gender and GBV specialist from the Gender department of AUW-responsible for implementing the GBV and Gender actions plans for the AUW related component/sub-components with the direct supervision of Gender and GBV specialist of the PIC. AUW Environment Department will work with the Environment Spcialist hired by UGC for AUW, for the quality assurance of the implementation of the (AUW specific) ESMPs during construction. 6. UGC will recruit 1 feasibility study team for UTTA and the feasibility study team will engage one social and one environmental specialist along with the other specialists mentioned above. Specialists will be responsible for preparing UTTA-ESIA, ESMP and RAP/ARAP if required. They will also be responsible for ensuring that ESMF compliance requirements are properly reflected in the feasibility studies. | 1. Recruitment of 01 chief Implementation Officer (CIO). Recruitment process will start within 15 days of Project effectiveness2. **UGC will recruit 5 (five) specialists for PIC** -1 Senior Environmental Specialist, 1 Social Development Specialist, 1 Gender and GBV Specialist, 1 Consultation and Communication Specialist and 1 Labor and OHS Specialist. Recruitment process will start within 15 days of Project effectiveness.3.Additionally, **UGC will recruit 2 (two) specialists for AUW** - 01 full time environmental specialist and 01 full time Social Development Specialist. Recruitment process will start within 15 days of Project effectiveness. 4. Recruitment process of E&S firm will start within 15 days of project effectiveness.5. AUW will deploy 01 Gender and GBV specialist from the Gender department of AUW within 15 days of project effectiveness.6. Recruitment process of UTTA Feasibility Team will start within 30 days of project effectiveness. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW;Funding from the Project budget. |
| 1.2 | **ENVIRONMENTAL AND SOCIAL ASSESSMENT**1. Prepare and disclose the Environmental and Social Management Framework (ESMF)
2. Prepare and disclose the Environmental and Social Impact Assessment (ESIA) including ESMP for AUW
3. Prepare and disclose site specific ESIA’s including ESMP for UTTA and other rehabilitation and upgradation as guided by ESMF
4. Prepare, disclose and implement RAP/ARAP (if require) for subprojects as guided by RPF
5. Prepare and disclose E&S assessment and screening for subprojects as soon as they are known
6. Assess the risk and impacts of SEA/SH of the proposed project activities and prepare GBV and Gender Action Plan
7. **EXCLUSIONS**: Exclude the following types of activities as ineligible for CERC financing under the Project:
* Activities with high risk of environmental and social impact;
* Activities without any Bio-Safety measures;
* Concerning significant conversion or degradation of critical natural habitats. Including, but not limited to, any activity within wildlife and forest reserves, national parks, conservation forests and sanctuaries.
* Damages cultural property, including but not limited to, any activities that affect the properties inscribed in the World Heritage List, other archaeological and historical sites; and religious monuments, structures and cemeteries.
* Requires involuntary acquisition of land, or the resettlement or compensation of more than 200 people
* Requiring pesticides that fall in WHO classes IA, IB, or II.
* Affecting waters of riparian neighbors.
* New primary roads and Highways, new irrigation and drainage schemes, construction of any dams
* New power generating capacity of more than 10 MW, New exploration, production or distribution. Rehabilitation of production or distribution systems
* Activities involving the use of wood for fuel or as raw material from natural habitats. Activities involving the use of hazardous substances.
 | 1. UGC-ESMF is prepared and will be disclosed before appraisal.
2. AUW-ESIA is prepared and will be disclosed before appraisal. This will be updated and disclosed again during detailed design stage and prior the construction starts.
3. Site-specific ESIA’s will be prepared during detailed design stage of each sub-project and prior to construction works
4. RAP/ARAP (if require) will be prepared, disclosed and implemented during detailed design stage of each sub-project and prior to construction works
5. During detailed design stage of each sub-projects
6. UGC has already prepared GBV and GAP which will be updated and disclosed within 3 months of project effectiveness.
7. These exclusions shall be applied as part of the assessment process conducted component 4 (CERC) (if emergency finance is required).
 | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities;Funding from the Project budget. |
| 1.3 | **MANAGEMENT TOOLS AND INSTRUMENTS**Prepare, disclose, update and implement an Environmental and Social Management Plan (ESMP) and C-ESMP (where construction activities are involved) for each sub-project, along with the following instruments in a manner acceptable to the Bank:* Resettlement Policy Framework (RPF)
* RAP/ARAP (if required)
* GBV and Gender Action Plan (GAP)
* Stakeholder Engagement Plan (SEP)
* Labor Management Procedures (LMP)
* Indigenous People’s Planning Framework (IP Framework)
* Preparation of Contractor’s ESMPs (C-ESMPs) and related plans such as OHS Plan, Waste Management Plan, Workers’ Camp Management Plan, and CHS Plan, Site Restoration Plan, and traffic management plan etc.
* Waste Management Plan
* OHS Plan
* Community Health and Safety Plan
* Traffic Management Plan
 | ESMF, RPF, LMP, IPPF, GBV and GAP, and SEP are prepared. Remaining documents will be prepared during detailed design phase of each sub-project and implemented during construction/upgradation/ refurbishment/ physical works. Contractors will prepare C-ESMP within 30 days of contract effectiveness.   | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities, contractors;Funding from the Project budget. |
| 1.4 | **MANAGEMENT OF CONTRACTORS**1. Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the **LMP**, into the Environmental, Social, Health and Safety (**ESHS**) specifications of the respective procurement documents with contractors. Thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts. Prepare site specific Labor Management Plans.2. Bidding documents and contracts to include relevant measures in the ESMP, including written Codes of Conduct to mitigate GBV/SEA/SH, incorporate other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19 and other communicable diseases risks with respect to its workers and surrounding communities. 3. Preparation of Contractors-ESMPs and other plans as described in 1.3.  | 1. Prior to issuance of EOI notice for contractors 2. During Bid document preparation  3. Prior to commencement of civil/upgradation/refurbishment/physical works  | 1. SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;2. SHED-MOE and UGC 3. Contractor  |

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| **ESS 2: LABOR AND WORKING CONDITIONS**  |
| 2.1 | **LABOR MANAGEMENT:** 1.The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), ensuring appropriate working condition amidst a public health emergency (including potential mass outbreak of COVID-19); provision of training on handling emergency situation especially health related issues and accidents; and setting out grievance arrangements for Project workers, and incorporating labor requirements in the procurement documents and contracts with contractors and supervising firms. The Recipient will prohibit child labor (any person under the age of 18), forced labor and trafficked persons.2. Prepare, update, adapt, and implement the Labor Management Plan. 3. Prepare and implement Emergency Plan for the Exchange Students and Faculties | 1. Labor Management Procedures is prepared and will be disclosed prior to appraisal 2. Contractors will prepare labor management plan within 30 days of contract effectiveness. ESS2 measures will be implemented throughout Project implementation. 3.Prepare within 2 months of project effectiveness.  | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |
| 2.2 | **GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS**Establish, maintain, and operate a GRM for the Project which will include issues of Project workers, as described in the LMP and consistent with ESS-2. | GRM for the workers will be established before commencement of Project activities and it will remain operational throughout Project implementation. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in LMP, especially measures related to mitigating COVID-19 risks. | Before beginning of the construction/upgradation/refurbishment/physical works and maintained throughout Project implementation | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |

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| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** |
| 3.1 | **RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:**Develop and implement site specific ESMPs in accordance with ESIAs and ESMF for pollution prevention and take initiative to reduce, reuse or recycle waste material to the extent possible. Wastes generated in the sanitary systems to be treated, transported and disposed in a manner that does not harm the environment and human health and in an environmentally safe manner as detailed in the relevant ESMP. | ESMPs to address the issues of resource efficiency and pollution prevention to be developed as soon as project specific locations are known and before beginning of construction/upgradation/refurbishment/physical works.*Throughout project implementation**Monitoring throughout the implementation* | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |

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| **ESS 4: COMMUNITY HEALTH AND SAFETY** |
| 4.1 | Put measures in place to prevent or minimize the spread of the infectious diseases/COVID-19 to the community and among workers/labor camps by following national and WHO guidelines of social distancing and other measures. Ensure the avoidance of all forms of Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) by establishing written Codes of Conduct for all workers in the project area as well as train and sensitize them on this issue. The IA has already prepared a SEP and will adopt and implement a Project Grievance Redress Mechanism (GRM) under SEP as well as a labor related GRM under LMP. Project GRM will also manage the risks of GBV and SEA.Ensure that any security personnel deployed in the Project area follow strict rules of engagement and avoid any escalation. | ESMF, LMP and SEP have been prepared and community health and safety issues described therein will be adopted and followed throughout Project implementation (including all required updates to the documents).  | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |

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| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** |
| 5.1 | **RESETTLEMENT PLANS:** Prepare ARAP/RAP based on the Social Assessment and screening for AUW. Once the site for UTTA is identified, RAP/ARAP will be prepared, if required.  | Prior to project implementation. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS:**Carryout screening to identify any potential sensitive sites of biodiversity value in or near proposed intervention sites and carryout site-specific assessment to identify potential impacts and propose appropriate mitigation measures. Implement relevant measures as per ESMPs of ESIAs and ESMF. | In case risks on sites of biodiversity value is identified during screening, measures to be taken as per mitigation hierarchy before any construction/upgradation/refurbishment/physical activities begin.*Monitoring throughout the implementation* | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** |
| 7.1 | **INDIGENOUS PEOPLES PLAN**:Prepare, disclose and Implement the IPPF and develop Indigenous Peoples Plans (IPPs), if such communities exhibiting characteristics mentioned in ESS7 are found in the project intervention areas per assessments conducted under action 1.2 above.  | An IPPF has been prepared and disclosed prior to appraisal. Based on the outcome of the social assessment, prepare and implement IPPs before sub-project implementation if communities exhibiting characteristics mentioned in ESS7 are identified in project intervention areas. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |
| **ESS 8: CULTURAL HERITAGE** |
| 8.1 | Include chance finds procedures in works contracts requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage. | During preparation of bid documents | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |

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| **ESS 9: FINANCIAL INTERMEDIARIES** |
| 9.1 | n/a | n/a | IA and World Bank |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION**Implement the SEP. The SEP may be amended, with WB team consent and updated (and redisclosed) as needed during Project implementation. Every sub-project will have site specific SEP.**PROJECT GRIEVANCE MECHANISM:** Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP. | Implemented throughout the Project implementation period. Prior to project effectiveness and updated from time to time as needed and maintained throughout project implementation. | SHED-MOE and UGC (Implementing Agencies, IAs) and AUW and concerned universities and contractors;*Funding from the Project budget.* |

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| **CAPACITY DEVELOPMENT SUPPORT (TRAINING)** |
| **Specify Training to be provided** | **Targeted Groups and Timeframe**  | **Training Completed** |
| The UGC, with support of third-party resources as needed (independent experts, NGOs, etc.) will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation. |
|  **ESF**. Training on ESF and the 10 ESSs—including preparation of ESMP | Personnel directly related with project at the IA | Within six months of Project effectiveness  |
| **Issues Related to COVID-19*** Use and disposal of PPE (for all)
* Working in COVID-19 environment (construction workers)
* COVID-19 Infection Prevention and Control mechanism
* Standard precautions for COVID-19 (social distancing etc.)
* Risk communication, prevention and community engagement (Administrative and operational personnel)
* WHO and CDC guidelines on quarantine
* Compliance with the obligations of The Communicable Diseases (Prevention, Control and Eradication) Act, 2018
 | Officials of IA, locally active NGOs, Civil Work Contractors, Workers | Prior to mobilization of project staff and workers/ contractors  |
| **Occupational Health and Safety Module:*** ESMP implementation
* GBV/SEA/SHA
* Workplace risk management
* Prevention of accidents at work sites
* Health and safety rules
* Solid and liquid waste management
* Traffic and Road Safety
* Preparedness and response to emergency situations
 | Officials of IA, Locally active NGOs, Civil Work Contractors, Workers | Prior to or at the time of mobilization and including daily briefs and quarterly orientation throughout the project |
| **Labor and Working Conditions*** Terms and conditions of employment according to national working laws and regulations
* Labor code of conduct
* Contractor and sub-contractor Codes of Conduct
* Worker’s organizations
* Child labor and minimum age employment rules
 | IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders*)* | Prior to or at the time of mobilization upon Project effectiveness and refreshers at 6 months interval.  |
| **Grievance Redress Mechanism Module**, design and production of a training module addressing the following aspects:* + Registration and processing procedure
	+ Grievance redress procedure
	+ Documenting and processing grievances
	+ Use of the procedure by different stakeholders
 | ES, SDS, HS, Local Governments, consultation and communication specialist, Civil Society, Local NGOs, Contractors,  | Within four months of Project effectiveness and thereafter once every six months  |
| **GBV Risk Module**Raising awareness and measures to prevent and mitigate GBV/SEAH risks.The topics and activities will be developed and included in the Project GRM. | IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders), Local NGOs, OCC Staffs | Within six months of Project effectiveness and thereafter yearly |
| **Waste Management**Caretakers appointed by Educational Institutions will be trained for operation and maintenance, with a special focus on safe disposal of wastewater including necessary training, operation, environmental monitoring and awareness on sanitation technology and management. | Caretakers of Educational Institutions  | Upon assignment of the caretakers |

**Government of Islamic Republic of Afghanistan**

**Ministry of Higher Education**

**Higher Education Acceleration and Transformation Project (P168961)**

**ENVIRONMENTAL and SOCIAL**

**COMMITMENT PLAN (ESCP)**

**October ,2020**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Government of the Islamic Republic of Afghanistan (the **Recipient**) will implement the Higher Education Acceleration and Transformation Project (the **Project**), with the involvement of Ministry of Higher Education **(MoHE)**. The International Development Association (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 (the **Bank**) representing the Association. 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, such as Stakeholder Engagement Plan (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 implementation of specific measures and actions is conducted by MoHE 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 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. The Recipient will 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 ENTITY/AUTHORITY**  |
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| **MONITORING AND REPORTING** |
| A | **REGULAR REPORTING** Prepare and submit to the Bank regular monitoring reports on the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s). | *Quarterly & annual reports throughout Project implementation.*  | *Ministry of Higher Education*  |
| B | **INCIDENTS AND ACCIDENTS** Promptly notify the Bank of any incident or accident including COVID -19 infections that might occur to the students or faculty, who get enrolled under the program, both in country and abroad. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. | *Notify the Bank within 48 hours after learning of the incident or accident* *A report on actions taken to be provided on the same by 07 (Seven) days of notifying the Bank.* | *Ministry of Higher Education*  |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| 1.1 | **ORGANIZATIONAL STRUCTURE**MoHE will utilize the support of Operations and Monitoring Support team (OMST) under the on-going World Bank funded Project – Higher Education Development Project (HEDP) for day-to-day implementation and coordination of the proposed activities in Afghanistan. A full time Environment and Social Specialist recruited under OMST will remain responsible for all the environment and social risks/impacts including monitoring and ensuring application of COVID-19 protocol of Ministry of Public Health (MoPH) and World Health Organization (WHO), with qualifications, experience and under terms of reference satisfactory to the Bank. Ensure that specialists have the required experience in handling issues related to GBV/SEA/SH and social assessment skills. | *An Environment and Social specialist hired under HEDP in MoHE will be retained throughout HEAT Project implementation*  | *Ministry of Higher Education* |
| **ESS 2: LABOR AND WORKING CONDITIONS**  |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**The existing World Bank financed project “HEDP” has recruited a dedicated Environmental and Social Specialist, who will support the TA activities under the HEAT project and will be retained throughout the project implementation period.  | *Throughout Project implementation.* | *Ministry of Higher Education* |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS** The existing World Bank financed project “HEDP” has already established a functional GRM system including GRCs at different levels (Ministry level and University level), and the same system will be upgraded and utilized for HEAT project. The HEDP already has a GRM focal point, who will be retained throughout the project implementation for HEAT project.  | *Grievance mechanism would be upgraded after approval and maintained throughout Project implementation.*  | *Ministry of Higher Education* |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  |
|  | Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, development and implementation of management plans and measures for pollution prevention and initiatives to reduce, reuse and recycle e-waste and associated plastic and packaging materials to the extent possible.  |

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| **ESS 4: COMMUNITY HEALTH AND SAFETY**  |
| 4.1 | **COMMUNITY HEALTH AND SAFETY:** Put measures in place to prevent or minimize the spread of the infectious diseases/COVID-19 by following national and WHO guidelines of social distancing and other measures.  | *Infection prevention and control guidelines will be implemented throughout the project implementation, as required.*  | Ministry of Higher Education |
| 4.2 | **GBV AND SEA RISKS**:Ensure the avoidance of all forms of Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/sexual Harassment (SH) by establishing written Codes of Conduct for all teachers and educational professionals working with the beneficiary young women in the project. The IA has already prepared a SEP and will adopt and implement a Project Grievance Redress Mechanism (GRM) under SEP. Project GRM will also manage the risks of GBV and SEA/SH. The project will ensure mitigation measures are in place through Codes of Conduct, a separate GRM for GBV/SEA/SH for all project actors to address grievances confidentially, anti-GBV/SEA/SH policies instituted in project funded institutions, teacher training and curriculum will include anti-GBV/SEA/SH training and contractor training programs on GBV/SEA/SH. The Government of Afghanistan together with the Bank has developed some GBV and SH protocols specifically for educational settings that will be used as part of the mitigation tools package that would include a GBV action plan and codes of conduct.  | *Codes of conducted to be in place before commencement of project activities. Additional GBV/SEA/SH tools and training will be developed throughout the project as needed after monitoring and review of existing mechanisms.*  | Ministry of Higher Education |

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| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** [the relevance of ESS5 is established during the ESA process. If during Project preparation, it is determined that resettlement documents need to be prepared, this should be reflected in the ESCP. See examples below] |
|  | **Not Relevant** |  |  |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** [the relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the adoption of specific measures that may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS6-related measures are covered under an existing document or as stand-alone actions. See examples below]. |
|  | Not Relevant  |  |  |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** [See examples of possible actions below, if determined that ESS7 is relevant]. |
|  | Not Relevant  |  |  |
| **ESS 8: CULTURAL HERITAGE** [the relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the adoption of specific measures that may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS8-related measures are covered under an existing document or as stand-alone actions. See examples below]. |
|  | Not Relevant  |  |  |

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| **ESS 9: FINANCIAL INTERMEDIARIES** [This standard is only relevant for Projects involving Financial Intermediaries (FIs). See below a couple of examples of actions that should be considered when FIs are involved.] |
|  | Not Relevant  |  |  |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION**A SEP has been prepared which will be disclosed before appraisal. The approved SEP will be translated to both the local languages (Dari & Pashto) and disclosed on the MOHE website. The SEP will be updated as necessary, throughout the project implementation period.  | *The SEP will be implemented throughout the project implementation period* | *Ministry of Higher Education* |
| 10.2 | **PROJECT GRIEVANCE MECHANISM:** Upgrade and maintain and operate the existing grievance mechanism under the HEDP, as described in the SEP. | *The existing GRM system under HEDP will be upgraded before commencement of project activities and maintained throughout the project implementation*. | *Ministry of Higher Education* |
| **CAPACITY SUPPORT (TRAINING)** |
| **CS1** | Training topics for personnel involved in the implementation of Project activities will among others include: * COVID-19 Infection Prevention and Control Recommendations
* GBV/SEA/SH prevention measures
* Stakeholder engagement
* GRM and project information dissemination
* OHS
 |  Throughout Project implementation | Ministry of Higher Education  |