

**The Palestine Liberation Organization (for the benefit of the Palestinian Authority)**

**Project:**

**Improving Early Childhood Development Project (ECD) - (P168295)**

**ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)**

**September, 2019**

**The Palestine Liberation Organization (for the benefit of the Palestinian Authority Improving Early Childhood Development**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Palestine Liberation Organization (for the benefit of the Palestinian Authority) is implementing the Improving Early Childhood Development(CED) Project hereinafter (the Project), with the involvement of the following Ministries; Ministry of Education (MOE), Ministry of Health (MOH), and Ministry of Social Development (MOSD). Project Coordination Unit (PCU), established solely to implement the projects funded by The International Development Association hereinafter (the Association) at MOE through its Director General of Buildings (D.G. of Buildings), entity in charge of all the constructions under the Ministry of education together with the Project Management Unit (PMU) at MOH will be responsible for following up the implementation of the environmental and social considerations stated in the Enviornemntal and Social management Framework (ESMF). An Environmental and Social Officer (ESO) will be hired at the D.G. of Buildings to follow up the implementation of environmental and social requirements and establish the Enviornemntal and Social Management System (ESMS) at MOE, given that MOE will act as the coordinating Ministry for the implementing of the project. . The Association) has agreed to provide financing for the Project.
2. The Palestine Liberation Organization will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out a summary of the material measures and actions, as well as the timing for each of these.
3. The Palestine Liberation Organization will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), stakeholder Engagement Framework/Plan (SEF/SEP), and Labor Management Procedure (LMP) thathas been developedfor the Project and includes guidelines and mitigation measures for Gender Based Violence (GVB) and the timelines specified in those E&S documents.
4. The Palestine Liberation Organization 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 Palestine Liberation Organization 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 Palestine Liberation Organization, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of the Project changes and unforeseen circumstances or in response to assessment of the Project performance conducted under the ESCP itself. In such circumstances, the Palestine Liberation Organization 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 Palestine Liberation Organization whom will promptly disclose the updated ESCP. Depending on the project, the ESCP may also specify the funding necessary for completion of a measure or action. The Palestine Liberation Organization 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 Palestine Liberation Organization will provide additional funds, if needed, to implement actions and measures to address such risks and impacts which may include environmental, health, and safety impacts, Gender-Based Violence (GBV), and sexual Exploitation and Abuse (SEA).

| **Improving Early Childhood Development Project (ECD)****ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN** **September 2019** |
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| ***Summary of the Material Measures and Actions to Mitigate the Project’s Potential Environmental and Social Risks and Impacts*** | ***Timeframe*** | ***Responsibility / Authority and Resources/Funding Committed*** |  ***Date of Completion***  |
| **ESCP Monitoring and Reporting** |
| A | **REGULAR REPORTING**:PCU at MOE and PMU at MOH will prepare and submit regular environmental and social monitoring reports on compliance status of the project implementation, in accordance with legal agreement, including the requirements of ESCP, and ESSs.More elaborates aspects of monitoring and reporting will be provided in ESMF, SEF, SEP, and LMP. The scope and outline of the progress and monitoring report will be agreed upon with the Association within the first three months after project effectiveness. | Quarterly  | MOE’s and MOH’s Environmental and Social Officer (ESO) in coordination with D.G. of BuildingsFunding from project budget | Three months after the start of the project implementation and every quarter thereafter.  |
| B | **INCIDENTS AND ACCIDENTS NOTIFICATION:** The following will be given ultimate priority:* Notify the Association within 24 hours of any incident or accident related to the Project or that has, or could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example, occupational accidents that could result in death or serious injury, cases of GBV or violence against minors, injuries, falls, vehicle accidents and electrocution;
* Provide sufficient details regarding the incident or accident, and indicate immediate measures taken to address it;
* A report of the incident will be submitted, detailing summary findings of the Root Cause Analysis (RCA);
* An incident register will be maintained at all construction sites, throughout the duration of the works.
 | Any incident or accident shall be notified immediately by the Recipient to the Association after occurrence. Fatalities will be reported within 24 hours after occurrence. | ContractorsPCUs in MOE and MOH Implementationfunding to be part ofthe site-specific ESMPs budgets | Within 24 hours of incident or accidents throughout the project implementation  |
| C | **CONTRACTORS MONTHLY REPORTS**Contractors will be required to provide monthly monitoring reports to the PCU and PMU. Such monthly reports would be submitted to the Association by the Borrower upon request. |  |  |  |
| **SUMMARY ASSESSMENT** |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| 1.1 | **ORGANIZATIONAL STRUCTURE:** MOE and MOH will establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks including an Environmental and Social Officer (ESO) responsible for implementing the Project activities. The ESO will oversee the implementation of the Environmental and Social Management Framework (ESMF), prepare site-specific ESMPs for the construction locations, Enviornmnetal and Social Health and Safety (ESHS) management and ensure contractors compliance. | The ESO will be selected within three months after appraisal and no later than by Project effectiveness  | PCU at MOE, and PCU at MOH Funding from Project budget | By no later than January 2020. |
| 1.2 | **ENVIRONMENTAL AND SOCIAL ASSESSMENT:** Prepare the ESMP based on the ESMF and update, SEF/SEP, and LMP that has been prepared for the Project, in a manner acceptable to the Association once subprojects are identified | After identification of subproject and prior to initiating construction | ESO in coordination with the D.G. of BuildingsFunding from the Project budget | Throughout the Project implementation |
| 1.3 | **MANAGEMENT TOOLS AND INSTRUMENTS:**Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Association. The following plans will be developed and implemented: * Environmental and social standard’s sections to be included in the TORs, tender documents for suppliers and construction works contracts, the environmental and social clauses to be included in the TORs and tender documents including codes of conduct, coordination, reporting, monitoring, and GRM;
* Occupation and Health and Safety (OHS) management plan;
* Updated Stakeholder Engagement Plan (SEP) that have already been prepared for the Project (in 10.1). Prepare and implement site specific SEPs as the sites are identified. (in 10.2).
 | After identification of subproject and prior to the commencement of works  | ESO in coordination with the D.G. of Buildings and MOHFunding from the Project budget | Prior to initiating construction  |
| vg.4 | **MANAGEMENT OF CONTRACTORS:** Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. These measures shall include, but not limited to:* Assessment of the environmental and social risks and impacts associated with contracts of suppliers/construction;
* Ascertain that the Ministries have adequate human resource with knowledge and skills to perform their project tasks in accordance with their commitments;
* Incorporate all relevant aspects of the ESCP and the relevant management tools into tender documents;
* Monitor contractors’ compliance with their commitments;
* Require contractors to have equivalent arrangements with their subcontractors;
* All contractors to have Environment and Social Staff;
* Ensure that worker’s awareness on prevention of HIV/AIDS, GBV, and SEA, and other health issues are included in service provider’s tender documents in accordance with national laws and the Association ESF requirements.
 | During preparation of procurement/bidding documents  | The recipient through (name the PIUs)ESO in coordination with D.G. of Buildings and the consultant Engineering Offices | Before signing of the contract. Then monitor throughout project implementation. |
| 1.5 | **PERMIT, CONSENTS AND AUTHORIZATIONS:** Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities; making sure to comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout the Project implementation.All suppliers for MOH’s equipment and raw-materials (sand, stones, bricks, timber and other relevant construction materials) for MOE’s construction works should be authorized suppliers/providers with legal documents to operate. | Prior to procurement of equipment or bidding of construction works that require permits, consents, authorizations  | PCU from the Ministry involved | By project effectiveness and continues throughout the Project implementation |
| **ESS 2: LABOR AND WORKING CONDITIONS**  |
| 2.1 | **LABOR MANAGEMENT PROCEDURES:** Update, adopt, and implement the Labor Management Procedures(LMP) that have been developed for the Project and which includes the following:* Information to workers regarding their terms and conditions of employment including hours of work, wages, overtime, compensation and benefits, holidays, leaves, etc.;
* Provide workers with adequate periods of rest per week, annual holiday and sick leave, as required by national law;
* Ensure Non-Discrimination and Equal Opportunity in the project;
* Set out measures to prevent GBV and SEA in accordance to the ESF;
* Ban the use or support of child, forced or compulsory labor;
* Works should have signed contracts with clear terms as per the Palestinian Labor law.
 | Maintained and updated if necessary throughout the Project implementation | ESO in coordination with D.G. of Buildings and PCUs  | At the beginning of construction, repeated each time the instruments are updated. Throughout the Project implementation  |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS:** Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The mechanism to receive and facilitate resolution grievances regarding the following: MOE and MOH develop a manual for GRM system. Complaints shall be filed using one of the following methods:* Electronically: the complainant files a complaint electronically using the electronic GRM forms on the Ministry website: <https://cs.pmo.gov.ps/Users/Login.aspx?Redirect=~%2fdefault.aspx>[[1]](#footnote-1)
* By telephone: the complainant can call the following number- TelFax +970 2 2983229 and ESO mobile and email once hired.
* In person: the complainant files a complaint by filling a form at the Complaints Unit at the Ministry of Education offices in Ramallah

The contractors shall provide within the bidding documents, clear grievance mechanisms for the workers who will be employed or engaged in connection with the Project. The workers grievance mechanism will include: (i) procedure to receive grievances such as comment/complaint form, suggestion boxes, email, and telephone line, (ii) stipulated timeframes to respond to grievances, (iii) a register to record and track the timely resolution of grievances, and (iv) responsible office/department to receive, record and track resolution of grievances. Where possible, grievance mechanism will utilize existing formal or informal grievance mechanisms suitable for project purposes* ;

The mechanism, process or procedure will not prevent access to judicial or administrative remedies;Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and. | Maintained and updated throughout the Project implementation | ESO | March 2020 and maintained throughout the Project implementation  |
| 2.3 | **OHS MEASURES:** Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP acceptable to the Association to address:* Identification of potential hazards to the Project workers;
* Provision of preventive and protective measures;
* Training of the Project workers and maintenance of training records;
* Documentation and reporting of occupational accidents, diseases and incidents.

**Applicability and Approach:*** Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers.
* The contractors will hire a technical staff capable to manage the occupational health and safety issues of their employees.
* Preventive and protective measures will be introduced according to OHS management plan.
 | Prior to publication of bidding document and the Project construction works  | ESO in coordination with D.G. of Buildings  | Prior to initiating construction and maintain throughout the Project implementation |
| 2.4 | **EMERGENCY PREPAREDNESS AND RESPONSE:** As part of the manual for OHS measures include measures on emergency preparedness and response and ensure coordination with measures under 4.5. The following measures will be put in place:* Carry out the Risk Hazard Assessment (RHA), as part of the Environmental and Social Assessment;
* Prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected persons including:
* Engineering controls (such as automatic alarms, and shut-off systems) proportional with the nature and scale of the hazard;
* Identification of and secure access to emergency equipment available on-site and nearby;
* Training program for emergency responders;
* Evacuation procedures;
* Designated coordinator for ERP implementation;
* Notification procedures for designated emergency responders;
* Measures for restoration and clean-up of the environment following any major accident;
* Documentation of emergency preparedness and response activities, resources, and responsibilities.
 | Prior to initiating construction. Maintained throughout the Project implementation | ContractorsFunded under ESMP budget | Throughout the Project implementation |
| 2.5 | **PROJECT WORKERS TRAINING:** Project contractors in coordination with the recipient through (PCU) shall design and deliver training for Project’s workers in hygiene, health and safety, sexual transmitted diseases, GBV and SEA. | Prior to initiating construction and maintained throughout the Project implementation | Contractors in coordination with the ESOFunded under ESMP budget | Prior to initiating construction and maintain throughout the Project implementation |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  |
| 3.1 | **MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:** The Recipient shall adopt, and implement WasteManagement Plan. The following measures will be put in place to ensure effectivemanagement of wastes and hazardous materials:* Generation of waste and hazardous materials will be avoided or minimized in all possible measures;
* Develop detailed plan and implement measures and actions to manage waste and hazardous materials and require contractors to submit waste management plan including storage, final disposal, and supervision;
* Exclude the use of chemicals and hazardous materials subject to international bans.

Resource efficiency and pollution prevention and management measures will be covered under the ESMP to be prepared under action XX above. | Prior to initiating construction and maintained throughout the Project implementation | ESO and contractorsFunded under ESMP budget | Throughout the Project implementation  |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** |
| 4.1 | **TRAFFIC AND ROAD SAFETY:** Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action XX above. Bidding document of construction work will require bidders to submit their management plans for potential traffic and road safety risks to workers and potentially affected communities throughout the subproject implementation including monitoring. | Prior to initiating construction and maintained throughout the Project implementation | ESO in coordination with D.G. of Buildings ContractorsFunded under ESMP budget | Prior to initiating of construction and throughout the Project implementation  |
| 4.2 | **COMMUNITY HEALTH AND SAFETY:** Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities including behavior of Project workers, response to emergency situations, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.. | Prior to initiating construction and maintained throughout the Project implementation | ESO in coordination with D.G. of Buildings  | Prior to initiating construction and throughout the Project implementation |
| 4.3 | **GBV AND SEA RISKS:** Prepare, adopt, and implement a stand-alone GBV Action Plan, to assess and manage the risks of GBV and sexual exploitation and abuse (SEA). The assessment (in 4.2) shall include assessment of risks on GBV and SEA which will be prepared prior to initiating construction and implementation of the Project and will continue throughout the life cycle of the Project. Emphasis will be put on the following:* Prevent or mitigate risks of GBV/SEA that may result from interaction and collaboration between groups of actors;
* Organize awareness raising sessions and educate the workers and the community in the Project site on issues of GBV/SEA, legal rights, GRM and referral path for victims of GBV/SEA;
* GBV/SEA risks will be monitored continuously through the life cycle of the Project;
* GRM for GBV/SEA will be strengthened and integrated to track complaints related to GBV/SEA, including a feedback system for regular and timely feedback on actions taken to respond to complaints.
 | Prior to initiating construction and maintained throughout Project implementation. | ESO in coordination with D.G. of Buildings | June 2020 and throughout the Project implementation  |
| 4.4 | **GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:** The awareness raising sessions (in 4.3) will be monitored continuously throughout the Project implementation**.**GRM for SEA will be integrated to track complaints related to GBV and SEA. | Prior to initiating construction and maintained throughout the Project implementation | ESO in coordination with D.G. of BuildingsFunding from project budget | June 2020 and throughout the Project implementation and prior to initiating construction |
| 4.5 | **EMERGENCY RESPONSE MEASURES:** Throughout the life cycle of the Project, there will be continuous assessment of possible risks to the communities as it relates to emergency incidents such as the uncontrolled release of pollutants, fire, accidents, etc.Develop procedure compliance with local laws and international requirements relating to the emergency response approach, hazardous materials management, vehicle and container specifications, training of the drivers, and risks associated with the transportation route. Develop emergency plan to address the following aspects: response approach for hazardous materials, communication strategy, trained emergency response teams, emergency contacts and communication systems/protocols, procedures for interaction with local and regional emergency and health authorities, protocols for fire truck, ambulance, and other emergency vehicle services.  | Prior to initiating construction and maintained throughout the Project implementation | ESO in coordination with D.G. of BuildingsContractorsFunding under ESMP budget | Throughout Project implementation  |
| 4.6 | **SECURITY PERSONNEL:** Prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank.. | Prior to initiating construction and maintained throughout the Project implementation | Contractors in coordination with ESO and KGs/SchoolsFunding under ESMP budget | Throughout the Project implementation |
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| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** |
| 5.1 | **LAND ACQUISITION AND RESETTLEMENT:** There are no defined locations where land acquisition or resettlement is required. The expansion of public KGs/Schools will be within the footprint of the KGs/Schools. Therefore, there are no mitigation measures to be undertaken under ESS 5. . |  |  |  |
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| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS**: There are no actions under the Project affecting biodiversity or living natural resources given the fact project activities are conducted in urban areas, within the existing footprints of schools and healthcare clinic. .. | Prior to the ProjectImplementation aspart of the ESMP | ESO under the PCU.  | After subproject identification and prior to initiating construction and throughout the Project implementation |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** |
| 7.1 | There are no actions under the Project affecting Indigenous Peoples or Sub-Saharan Historically underserved Traditional Local Communities, therefore there are no mitigation measures to be undertaken under ESS7. |  |  |  |
| **ESS 8: CULTURAL HERITAGE** |
| 8.1 | **CHANCE FINDS:** Develop and document ‘Chance Finds procedure that will detail what the construction contractors must do in case valuable artefacts or culturally valuable materials are found. Such procedure will be included in all contracts relating to construction of the Project.Ensure relevant workers are trained in the requirements of the procedure prior to ground disturbance. | Prior to initiating construction and maintained throughout the Project implementation | Contractors | Throughout projectimplementation |
| **ESS 9: FINANCIAL INTERMEDIARIES**  |
| 9.1 | There are no actions under the Project related to Financial Intermediaries, therefore there are no mitigation measures to be undertaken under ESS9. |  |  |  |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| 10.1 | **SEP PREPARATION AND IMPLEMENTATION:** [A Stakeholder Engagement Framework (SEF) was prepared, adopted, and disclosed.] Prepare, adopt, and implement the Stakeholder Engagement Plans (SEP) in accordance with the terms of the ESF which includes the following:  | SEF was disclosed on [add date]After subproject identification and prior to the commencement of works | PCU/MOE | Throughout the Project implementation |
| 10.2 | * Organize stakeholder consultations SEP and emergency preparedness and response;
* Revise the documents as per received feedback;
* Establish appropriate channels of communication to maintain continuous engagement and communicating additional information that may arise at key stages in the Project cycle;
* Conduct survey on citizen feedback on the services provided.
 | Throughout Project implementationAnnually | ESO in coordination with D.G. of General Education and KGs/Schools | Throughout Project implementation |
| 10.3 | **PROJECT GRIEVANCE MECHANISM:** Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP. The grievance mechanism will ensure reception and timely response to any complaints made about the Project (including those from the providers as well as the users of education and health services and their communities) and will be the basis for developing appropriate mitigation strategies.The grievance redress mechanism will include the following elements:* Consolidate of all existing grievance redress channels into a single grievance mechanism (GM) for the Project;
* Modalities by which people can submit their complaints including, but not limited to, submissions in person, by phone, text message, or e-mail;
* A log where complaints are registered in writing, maintained as a database;
* Proper arrangements for the grievance mechanism including monitoring and reporting;
* Inform people on their rights and the GRM process throughout the life cycle of the Project;
* Analyse the mechanism to determine if vulnerable and disadvantaged groups and individuals are involved.
 | Prior Project effectiveness and maintained throughout the Project implementation | ESO in coordination with PCUs | Throughout the Project implementation |
| **Capacity Support**  |
| **Specify Training to be provided** | **Specify Targeted Groups and Timeframe for** Delivery | **Specify Training Completed** |
| Use of Personal Protective Equipment (PPE) | All workers and project staffPrior to initiating construction, continuous |  |
| Emergency Preparedness and Response  | ESO, Site Engineers, and the PCUPrior to initiating construction |  |
| OHS including emergency prevention and preparedness and response arrangements to emergency situations | All workers and Project staff.Continuous throughout the ProjectImplementation |  |
| Environmental and social awareness | All workers and Project staff.Continuous throughout the ProjectImplementation |  |
| GBV, SEA, and communicable diseases | All workers, Project staff, and KGs/Schools administration and teachers.Continuous throughout the ProjectImplementation |  |
| Environment and social monitoring and reporting | ESO in coordination with Project staff |  |

1. Press click first and then the link to get to the link. [↑](#footnote-ref-1)