

**THE GOVERNMENT OF SOMALILAND**



**MINISTRY OF EDUCATION AND SCIENCE**

**Somaliland Empowering Women through  
Education and Skills -Raja Kaaba” Project  
(P176898)**

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

**FEBRUARY 28, 2025**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. As agreed with the International Development Association (IDA), the Government of Somaliland (“GoSL”) pursuant to an agreement dated March 4, 2024. (the “FGS-GoSL Agreement”) that: (i) an amount of five million) be made available to GoSL out of the Grant, for GoSL to implement its Respective Activities under the Project, as further specified in the Project Financing Agreements.
2. The GoSL shall ensure that its Respective Activities under the Project are implemented in accordance with the Environmental and Social Standards (ESSs) and this ESCP in a manner acceptable to the Association. This ESCP sets out material measures and actions, specific documents or plans, as well as the timing for each of the activities and is a part of the environmental and social commitment plan under Project Financing Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the IDA-GoSL Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the GoSL shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, grievance management, and monitoring and reporting arrangements. This ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the GoSL Respective activities of 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, the said E&S instruments may be revised from time to time with prior written agreement by the Association
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. Above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the GoSL 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 GoSL through the minister responsible for Education 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 GoSL through the MoES. The MoES will promptly disclose the updated ESCP on its publicly accessible website.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of GoSL Respective Activities under the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance redress mechanism.</p>	<p>Submit quarterly reports to the Association throughout implementation of GoSL Respective Activities under the Project, commencing after the Effective Date. Submit each report to the Association no later than 45 days after the end of each reporting period</p>	<p>Project Implementation Unit (PIU) at MoES</p>
B	<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION</b></p> <p>Promptly notify the Association of any incident or accident related to GoSL Respective Activities under 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 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 supervising entity, as appropriate. Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>A subsequent report shall be provided in a timeframe acceptable to the Association, as requested.</p> <p>Report all other incidents and accidents to the Association in quarterly reports</p>	<p>Project Implementation Unit (PIU) at MoES</p>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to submit to the Joint Steering Committee (JSC) monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts.</p> <p>Provide the contractors' design and supervision consultants' monthly monitoring reports on E&amp;S implementation submitted to the Joint Steering Committee (JSC).</p>	<p>Monthly preparation of the reports.</p>	<p>Project Implementation Unit (PIU) at MoES</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<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 Somaliland Project Implementation Unit (PIU) with qualified staff and resources to support the management of E&amp;S risks including appointing within the PIU, a fulltime Environmental Specialist, a fulltime GBV/SEA specialist, and a fulltime Security Specialist.</p>	3 months after effectiveness	Project Implementation Unit (PIU) at MoES
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>In accordance with the screening procedures enumerated in the Environmental and Social Management Framework (ESMF) for this project, undertake site-specific environmental and social risk screening and impact assessments for subprojects including assessment of the physical environment, location of facilities to be upgraded under the Project, availability of suitable land free of encumbrances and contestation, ensuring equity and inclusivity of site-selections - as well as capacity of likely contractors to implement ESMPs and monitoring arrangements.</p>	Prior to implementation of site-specific subprojects.	Project Implementation Unit (PIU) at MoES
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Prepare, consult on, adopt and publicly disclose an Environmental and Social Management Framework (ESMF) for the project in a manner satisfactory to the Association</p>	ESMF shall be prepared and cleared by effectiveness and thereafter applied throughout Project implementation	Project Implementation Unit (PIU) at MoES

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Prepare, consult on, adopt and publicly disclose Labour Management Procedures (LMP) for the project in a manner satisfactory to the Association	LMP shall be prepared and cleared not more than 3 months after effectiveness and thereafter applied throughout Project implementation	Project Implementation Unit (PIU) at MoES
	Prepare, consult on and adopt Security Management Plan (SMF) for the project in a manner satisfactory to the Association	SMP shall be prepared and cleared prior to effectiveness and thereafter applied throughout Project implementation	Project Implementation Unit (PIU) at MoES
	Prepare, consult on, adopt and publicly disclose, sub-project construction and operation Environmental and Social Management Plans (ESMPs) as specified in the ESMF screening criteria and in agreement with the World Bank's Environmental, Health and Safety Guidelines (EHSG), in a manner satisfactory to the Association	The Construction Phase ESMP shall be prepared and submitted to the Association for clearance before any civil works is undertaken at the Women's University.  The Operation Phase ESMP shall be prepared and submitted to the Association for clearance before any intake of students at the Women's University.	Project Implementation Unit (PIU) at MoES
	Prepare, adopt, and disclose the Project SEAH Prevention and Response Action Plan,	SEAH prevention and response Action Plan Prior to disbursement	Project Implementation Unit (PIU) at MoES
	Update project wide Stakeholder Engagement Plan (SEP) as necessary, and publicly disclose and implement, including GM and inclusion plan satisfactory to the Association.	As needed throughout the project	Project Implementation Unit (PIU) at MoES

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Submit the Project Operations Manual, including details of all E&S requirements for the Association's prior review and clearance.	The POM shall be approved within three months of Project effectiveness.	Project Implementation Unit (PIU) at MoES

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

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	the LMP, SEAH Prevention and Response Action Plan, and Security Management Framework/Plan.		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES (LMP)</b> Develop LMP to address labor risks, including (but not limited to) <ul style="list-style-type: none"> <li>▪ conditions of service;</li> </ul>	Not more than 3 months from effectiveness.	Project Implementation Unit (PIU) at MoES

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<ul style="list-style-type: none"> <li>▪ code of conduct;</li> <li>▪ security and safety of project workers;</li> <li>▪ non-discrimination measures;</li> <li>▪ occupational, health and safety (OHS) measures;</li> <li>▪ prevention of child and forced labor;</li> <li>▪ emergency preparedness and response;</li> <li>▪ grievance redress mechanism for project workers;</li> <li>▪ training of project workers on key issues including OHS and GBV/SEAH prevention; and</li> <li>▪ management of labor influx.</li> </ul>		
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Develop and maintain a Grievance Mechanism (GM) for direct project workers, including contracted and primary supply workers as part of the LMP as well as a separate confidential mechanism for GBV/SEAH complaints in order to ensure that to make sure that the complaints remain confidential and survivor-sensitive.</p>	<p>Grievance redress mechanism to be operational prior to engaging Project workers.</p> <p>The mechanism to be maintained throughout Project implementation.</p>	Project Implementation Unit (PIU) at MoES
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the ESMF including through, inter alia, implementing adequate OHS measures and incorporating Labor Management Procedure (LMP) and Security Management Plan and SEAH Prevention and Response Action Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Measures to be operational prior to engaging Project workers.	Project Implementation Unit (PIU) at MoES

<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Resource efficiency and pollution prevention and management measures shall be covered under the ESMPs to be prepared under the clause 1.3 above.	Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects.	Project Implementation Unit (PIU) at MoES
	The Recipient shall support the development of agroforestry parklands, using indigenous vegetation on a plot ratio of 30 percent where upgrading works are taking place at existing educational campuses, which shall render ecosystem services, including climate mitigation benefits. The Project shall also include measures to incorporate climate resilience into the skills and leadership curriculum to be offered under TVET institutions as well as at the Women’s University.	Throughout Project implementation	Project Implementation Unit (PIU) at MoES / Contractor
	As part of the ESMF, the Recipient shall develop and implement measures and procedures for managing upgrading waste and any hazardous materials generated during component 2 of the Project and ensure their proper disposal. The contractors who will be hired to upgrade existing educational campuses shall prepare a waste management plan, which will be reviewed and approved of by the PIU’s Environmental Specialist.	Monitor implementation of the ESMPs throughout Project implementation.	Project Implementation Unit (PIU) at MoES / Contractor
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY:</b> Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including risks of labor influx; risk of exposure to infectious diseases response to emergency situations due to conflict or natural disasters, construction and structural safety risks, as well as traffic and road safety risks, and include these measures and actions in the ESMPs to be prepared in accordance with the ESMF , in a manner acceptable to the Association.  Ensure that the existing facilities to be upgraded under this Project are designed and modelled on the internationally accepted safe standards for institutions, with provision of adequate access to potable water and sanitation for women, youth and other enrolled persons and their teachers. The Recipient shall also ensure that indoor air quality (IAQ) is in compliance with World Health Organisation guidelines, including working to eliminate smoking in public spaces in the project-supported facilities.	Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects. Monitor implementation throughout Project implementation.	Project Implementation Unit (PIU) at MoES
4.2	<b>GBV AND SEAH RISKS:</b>		Project Implementation

	<p>Prepare, adopt, publicly disclose and implement a stand-alone project wide SEAH Prevention and Response Action Plan to assess and manage the risks of sexual exploitation and abuse, sexual harassment as well as other forms of GBV.</p> <p>Key measures include:</p> <ul style="list-style-type: none"> <li>• CoCs for project and contracted workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEAH provisions;</li> <li>• Mapping and development of partnerships with identified GBV service providers;</li> <li>• A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;</li> <li>• An Accountability Framework that outlines how the PIU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;</li> <li>• Establishment of special channel/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the project GM and enable training of GM operators on how to respond to cases that come forward.</li> <li>• Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace.</li> <li>• Clarification of GBV/SEAH requirements in bidding documents including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract;</li> <li>• Bid evaluations to include consideration for GBV/SEAH response proposals.</li> <li>• Identification of a Third-Party Monitoring to track implementation and management of GBV/SEAH risks; and</li> <li>• Ensuring additional funds are made available to implement measures to address GBV/SEAH risks and impacts that may arise during Project implementation.</li> </ul>	<p>Prior to disbursement for activities under Component 2.</p> <p>Implement the SEAH prevention and response Action Plan throughout Project implementation.</p>	<p>Unit (PIU) at MoES</p>
4.3	<p><b>SECURITY PERSONNEL:</b></p> <p>Prepare, adopt, and implement a Project-wide Security Management Framework</p>	<p>Prior to effectiveness</p>	<p>Project Implementation Unit (PIU) at MoES</p>

	<p>consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p> <p>Prepare, adopt, and implement a Project-wide Security Risk Assessment and Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p>	<p>Prepare and adopt and clear a Security Management Plan prior to disbursement for activities under components 2&amp;3.</p>	
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**ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT**

5.1	<p><b>FORCED DISPLACEMENT PRIOR TO PROJECT APPROVAL:</b></p> <p>Should involuntary resettlement displacement occur in anticipation of sites to be utilized or in any other project-financed infrastructure before board approval of the Project, relevant ESS5 requirements will be applied retroactively.</p> <p>If such requirements cannot be satisfied retroactively, the Bank will not support such interventions, or any other infrastructure development carried out.</p>	<p>Identification of such prior forced displacement when conducting screening and census survey during the RP process of subprojects.</p>	<p>Project Implementation Unit (PIU) at MoES</p>
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**ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES**

6.1	<p><b>BIODIVERSITY RISKS AND IMPACT:</b></p> <p>Consistent with the ESMF, ensure that ESS6-related measures are included in the ESMPs for subprojects, and that such measures are adopted and implemented in a manner acceptable to the Association.</p>	<p>Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects.</p> <p>Carry out the ESMP throughout Project implementation.</p>	<p>Project Implementation Unit (PIU) at MoES</p>
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**ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES**

	<p>This standard is not relevant, as there are no persons that meet the identification criteria for IP/SSAHUTLCs</p>		
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**ESS 8: CULTURAL HERITAGE**

8.1	<p><b>CULTURAL HERITAGE AND CHANCE FINDS:</b></p> <p>Consistent with the ESMF ensure that ESS8 related measures are included in the Environmental and Social Management Plans (ESMPs) for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.</p> <p>Prepare, adopt, and implement - if applicable - the chance finds procedure described in the ESMPs developed for sub-projects.</p>	<p>Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects</p> <p>Carry out the ESMPs, including complying with chance finds</p>	<p>Project Implementation Unit (PIU) at MoES</p>
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		procedures, throughout Project implementation.	
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant to the project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION:</b> Update, disclose and implement a SEP, in a manner acceptable to the Association.	SEP has been prepared.  To be updated regularly throughout Project implementation.	Project Implementation Unit (PIU) at MoES
10.2	<b>PROJECT GRIEVANCE MECHANISM:</b> Ensure a functioning, trusted and accessible Project GM, in line with the SEP.  Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.	Prior to disbursement for activities under Components 2.	Project Implementation Unit (PIU) at MoES
<b>CAPACITY SUPPORT (TRAINING)</b>			
	<b>MATERIAL MEASURES</b> The Recipient shall implement capacity enhancement for the PIU on: <ul style="list-style-type: none"> <li>▪ stakeholder mapping and engagement</li> <li>▪ relevant aspects of environmental and social assessment, including scoping and screening procedures</li> <li>▪ emergency preparedness and response planning</li> <li>▪ environmental health and safety guidelines</li> <li>▪ gender-based violence</li> <li>▪ establishment and monitoring of the grievance redress mechanism</li> <li>▪ incorporating environmental and social risk mitigation management measures</li> </ul>		

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	into procurement (pre- and post-bidding) and contract management		
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