THE REPUBLIC OF UGANDA

MINISTRY OF EDUCATION AND SPORTS

# Uganda Learning Acceleration Program (IPF Component)

# (ULEARN), P179397

# ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

## For Re-NEGOTIATION

## March 17, 2025

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Uganda (the "**Recipient**") through the Ministry of Education and Sports (MoES) will implement the Uganda Learning Acceleration Program (ULEARN), P179397 (the Project), as set out in the Financing Agreement and Grant Agreement. The International Development Association (hereinafter the "**Association**") and the Global Partnership for Education (GPE) (through the Association as Grant Agent) have agreed to provide financing for the Project, as set out in the referred agreements.

2. The Recipient shall ensure that the Project 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 Financing Agreement and Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.

3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. 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 shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient, through the Permanent Secretary, Ministry of Education and Sports. The Recipient shall promptly disclose the updated ESCP.

5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

6. Reference to "Effectiveness Date" in this ESCP refers to the Effectiveness Date of the Grant Agreement, which is expected to become effective before the Financing Agreement.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---|---|---|---|
| **IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT** | | | |
| A | **ORGANIZATIONAL STRUCTURE**<br>1. The MoES Planning Department shall implement the Project. A Project Support Unit (PSU) shall be established under the MoES to support the implementation of the Project in collaboration with various technical units, departments and agencies including Uganda National Examination Board (UNEB), National Curriculum Development Centre (NCDC) and the Directorate of Education Standards (DES). The MoES Gender Unit shall support the management of environmental, social, health and safety (ESHS) risks under the Project. The Unit shall also exercise an oversight role in the management of the ESHS risks under the Project.<br><br>2. The MoES shall maintain one Environmental Specialist and one Social Development Specialist to support the Gender Unit in the management of the ESHS risks under the Project. | 1) & 2) Maintain the PSU at MoES, including at least one Environmental Specialist and one Social Development Specialist, to support implementation of the ULEARN. | MoES |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| B | **CAPACITY BUILDING PLAN/MEASURES**<br>1. Undertake capacity assessment and prepare a Capacity Building Plan (CBP) acceptable to the Association. Conduct training for PSU, Project workers and relevant stakeholders including teachers, students and communities in accordance with the scope and schedule defined in the CBP including in:<br>• Understanding the ESF for E&S Specialists and PSU members,<br>• Implementation of the Stakeholder Engagement Plan (SEP),<br>• training on the requirements of the WBG EHS Guidelines<br>• Occupational and community health and safety,<br>• ESHS management under the CDD approach,<br>• Emergency preparedness and response,<br>• Gender-Based Violence (GBV) Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) prevention and response measures,<br>• Grievance management, and<br>• Labor management procedures.<br>2. In addition to the above, mobilize relevant stakeholders for capacity enhancement and support for the Enhanced Implementation Support and Monitoring (EISM) to ensure:<br>• Training of government staff (MoES/PSU etc.) and private sector consultants/clients, workers, and contractors on non-discrimination by developing training materials, identifying venues as well as providing other logistical support.<br>• Training Project level Grievance Redress Mechanisms (GRMs) on non-discrimination under the Project by developing training materials, identifying venues and providing trainers.<br>• Preparation of training modules and training for call center operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information.<br>• Provision of technical support to the GOU/MoES for the development of Guidelines on Non-discrimination of Workers. | 1) Submit capacity assessment report and CBP for no-objection of the Association within sixty (60) days after Project Effective Date and thereafter implement it throughout Project implementation.<br>2) Complete training of target stakeholders, preparation of training modules and guidelines on non-discrimination within two months (60 days) after the Project Effective Date and support the EISM throughout Project implementation. | MOES<br>MoES |
| **MONITORING AND REPORTING** | | | |
| C | **REGULAR REPORTING**<br>1. Prepare and submit to the Association regular monitoring reports on ESHS performance of the Project, including but not limited to status of preparation and implementation of E&S instruments required under this ESCP. | 1) Quarterly and Annually throughout Project implementation period, starting 6 months after the Project Effective Date. | MoES |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | 2. The Recipient shall support third party-monitoring of the risk of exclusion or discrimination for individuals or groups who may be vulnerable or marginalized, in relation to the provisions of the AHA by providing requested information to the World Bank hired EISM firm and its collaborators (CSOs/NGOs).<br><br>3. The Project Support Unit, assisted by the EISM, shall implement mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination and exclusion from Project benefits with the aim of:<br>• Enhancing the existing Project-level grievance mechanisms and developing and operating an independent mechanism that would identify, manage, and monitor cases of discrimination.<br>• Strengthening the capacity of Project Support Units (PSUs), workers, and contractors, subcontractors, and service providers.<br>• Ensuring contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.<br>• Developing a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.<br>• Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the case.<br>• Monitoring the efficacy of the agreed measures to mitigate the impacts on the Project. | Submit each report to the Association no later than 15 calendar days after the end of each reporting period.<br><br>2) Project teams shall provide monitoring data/information to the EISM monthly to enable it report quarterly with reports being submitted no later than 7 calendar days after the end of each reporting period.<br><br>3) Prior to the Project Effective Date and throughout Project implementation. | |
| D | **INCIDENTS AND ACCIDENTS** | | MoES |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | 1) Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of SEA, SH, accidents that result in death, serious or multiple injury, and any incidents, accidents and complaints related to the discrimination of vulnerable or marginalized individuals or groups. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, or complaint, 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.<br><br>2) Arrange for an appropriate review of the incident, accident, or complaint to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence. | 1) Notify the Association no later than 48 hours after learning of the incident or accident.<br><br>2 (i) Provide subsequent Root Cause Analysis (RCA) report & Safeguards Corrective Action Plan (CAP) to the Association within 10 calendar days following the incident/accident. All incidents/accidents shall also be entered in Incidents Log/Register and reflected in the quarterly reports.<br><br>2 (ii) For incidents, accidents and complaints related to the discrimination of vulnerable or marginalized individuals or groups notify the EISM within 48 hours. Subsequently, the EISM Firm shall notify the Bank within 24 hours upon receiving the notification from the Recipient.<br><br>2 (iii) Notification/reporting system shall be in place throughout the Project implementation. | |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| 1.1 | **ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS.**<br>a. Prepare a Strategic Environmental and Social Assessment (SESA) for the proposed revised Basic Requirements and Minimum Standards (BRMS) that shall incorporate climate change considerations in infrastructure design and environmental protection measures. A Stakeholder Engagement Plan shall be developed and site specific ESMPs consistent with the provisions of the Financing and Grant Agreements, in each case prior to initiating the respective activities and in time to include the respective requirements in bidding and contractual documents. | a. The SESA and Site specific ESMPs shall be developed prior to relevant Contractor's bidding processes and thereafter implemented throughout when the carrying out of activities. | MoES |
| | b. Incorporate the relevant aspects of the ESCP, including the Labor Management Procedures and SEP into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. | b. Before launching the procurement process for the relevant subproject activities, and thereafter throughout the implementation of such activities. | MoES |
| | c. Identify and address the risks related to exclusion or discrimination of individuals or groups affected by the enactment of the AHA, including through mitigation measures in the E&S documents for the Project. They shall include implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented such as establishing or enhancing existing project-level GRMs as well as a nationwide GRM hotline (hosted and operated by a local NGO/CSO) to receive grievances related to discrimination and exclusion from the Project, outreach and sensitizing project beneficiaries and communities on Inclusion and Non-Discrimination (IND) of vulnerable or marginalized individuals or groups, sensitizing and signing Codes of Conduct (CoC) with IND aspects for Project workers, and . They shall also include the risks identified in the public consultations on these documents involving the Recipient and civil society organizations. The Program Support Unit shall implement the mitigation measures for the Project with support from the EISM Firm. | c. During preparation of E&S documents and executed throughout the Project implementation. | MoES |
| 1.2 | **MANAGEMENT OF CONTRACTORS**<br>**WORKER CODE OF CONDUCT FOR CONSULTANTS**<br>a. Ensure that all workers including consultants hired to provide TA adhere to the Codes of Conduct (CoC) with provisions on non-discrimination and exclusion to be developed in line with the requirements of ESS2 listed in the TORs.<br>b. Provisions to prevent Gender-Based Violence/Sexual Exploitation and Abuse/Sexual Harassment (GBV/SEA/SH) shall be included in the CoC for contracted workers including consultants in line with ESS2 and relevant national laws and legislation and adopted and applied under the Project. | a), b) & c) Prior to engaging in subproject activities and adhered to throughout project implementation. | MoES |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | c. To the extent required by ESS2, the CoC shall reflect the requirement to address risks related to exclusion or discrimination of individuals or groups who may be vulnerable or marginalized. | | |
| 1.3 | **TECHNICAL ASSISTANCE**<br>a. Technical Assistance (TA) activities shall be undertaken in line with the requirements of the relevant ESSs and in a manner acceptable to the Association. Ensure that terms of reference for consultancy studies, feasibility studies, advisory services, capacity building, training and any other TA activities provided under the Project are prepared and delivered in a manner acceptable to the Association and consistent with the TORs and requirements of the relevant ESSs.<br><br>b. Ensure that outputs from the TA activities, including, inter alia, any environmental and social assessment and related environmental and social instruments, training and capacity building shall be consistent with the ESSs including training guides, materials and any other interventions to mitigate the risk of discrimination against or exclusion of any affected individuals or groups in providing or receiving benefits from the Program. | a) Incorporate ESSs requirements Prior to call for Bids/ Request for proposal and monitor compliance throughout Project implementation.<br><br>b) Throughout Project implementation. | MOES |
| **ESS 2: LABOR AND WORKING CONDITIONS** | | | |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**<br>a. Integrate requirements of ESS2 into consultants' ToRs. Screening for compliance with ESS2 shall be done by the Recipient during the recruitment process.<br><br>b. Prepare standalone Labour Management Procedures (LMP) to address labour related risks and impacts under the Project including potential risk of SEA-SH and discrimination or exclusion of any individuals or groups who may be affected by the provisions of the AHA. | a) Screen consultants ToRs before commencement of project activities.<br><br>b) Adopt the LMP within 30 days after the Project Effective Date and before engagement of workers. Thereafter implement the LMP throughout Project implementation. | MoES |
| 2.2 | **OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN**<br>a. Adopt, and implement Occupational Health and Safety (OHS) measures based on World Bank EHS Guidelines and Good International Industrial Practices (GIIP), and in line with ESS2 and relevant national laws and legislation. | a) OSH plan shall be prepared prior to commencement of bidding processes, incorporated in contracts and thereafter implemented throughout when carrying out activities. | MoES |
| 2.3 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**<br>a. Establish, maintain, and operate a GRM for project workers and schools as described in the consultants TORs and consistent with ESS2, with focal points to address these grievances established within MoES or at Local government level. | | MoES |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | b. Operate the GRM with the support of the EISM to ensure that it includes an effective, safe, ethical, and confidential mechanism to receive, manage, refer, and monitor grievances related to exclusion and discrimination. | a) & b) Operationalize GRM within 30 days after the Project Effective Date and throughout Project implementation. | |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | |
| 3.1 | **RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**<br>a. This standard is considered relevant when downstream impacts are taken into account. Relevant aspects of these standards shall be considered in the ESMPs prepared for the TA activities in line with ESS-1 | a) ESMPs shall be developed prior to relevant Contractor's bidding processes and thereafter implemented throughout when the carrying out of activities. | MoES |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** | | | |
| 4.1 | **COMMUNITY HEALTH AND SAFETY**<br>a) Develop and implement measures and actions to assess and manage specific risks (including risks of outbreaks such as Ebola, COVID-19, M pox etc.) and impacts to the school community (students/teachers/staff) following adequate community health and safety protocols for any risks associated with the presence of Project personnel in schools or communities, Project events, and of any risks which shall be set out in the LMP including measures to address school security issues and potential risk of SEA-SH. | a) Prepare and implement health and safety procedures as part of LMP in 2. 1 above | MoES |
| 4.2 | **SEA AND SH RISKS**<br>a) Develop, adopt and implement measures and actions satisfactory to the Association to manage the risks of GBV, SEA and SH consistent with the project risk classification.<br><br>b) Include the Project level GRM described in the Project SEP and LMP measures to ensure that it responds to GBV cases/complaints, on SEA and SH with a survivor centered approach. | a) Prepare and implement GBV/SEA/SH risk response mitigation measures within 30 days after the Project Effective Date and thereafter throughout the implementation.<br><br>b) & C) Implement within 30 days after the Project Effective Date, and thereafter throughout the implementation of such activities. | MoES |
| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** | | | |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| 5.1 | a) The IPF component through the TA will facilitate Environmental and Social Impact Assessment (ESIA) and Strategic Environmental and Social Assessment (SESA) studies to identify impacts related to implementation of civil works that may result in loss of access to land or loss of livelihoods. These risks will be addressed under site-specific C-ESMPS. | a) Prepare and implement C-ESMPS one month prior to commencement of construction activities. | MoES |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** | | | |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS**<br>The relevant aspects of these standards shall be considered in the SESA and ESMPs prepared for TA activities | During implementation of TA activities | MoES |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** | | | |
| 7.1 | a) Cultural setting and organisation of Vulnerable and Marginalized Groups (VMGs) result in exclusion from program activities including teacher training and classroom visits from CCTs. NCDC will lead the curriculum review and development of new EGR/EGM and remedial curricula and materials, including e-learning digitized content, and initial training of trainers. ESIA and SESA studies under the TA will identify risks to VMGs.<br><br>b) Prepare a targeted social assessment as part of the ESIA studies. | a) Prepare and implement C-ESMPS one month prior to commencement of construction activities.<br><br>b) Monitor implementation of C-ESMP recommendations from targeted engagement. | MoES |
| **ESS 8: CULTURAL HERITAGE** | | | |
| 8.1 | **CULTURAL HERITAGE RISKS AND IMPACTS**<br>a. Any relevant aspects of these standards shall be considered in the TA activities under the SESA and ESMPs prepared for the project activities | a) During implementation of TA activities. | MoES |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** | | | |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN**<br>a. Prepare a Stakeholder Engagement Plan consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.<br><br>b. Undertake stakeholder engagement and information disclosure related to Project beneficiaries and communities for vulnerable or marginalized individuals or groups disclose all key relevant information and assist and support the EISM activities such as: | a) The SEP was adopted and disclosed prior to Project appraisal. Thereafter, implement it and update it (as and when required) throughout the implementation of Project activities.<br><br>b) Within 30 days of the Project Effective Date and thereafter | MoES |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | • Prepare and implement a plan to disseminate information about the support provided by the EISM program including support to existent GRMs.<br>• Prepare community/beneficiary information materials on their rights within the Constitution of Uganda and World Bank/IFC policies informed by various official circulars issued by the GOU on non-discrimination and World Bank/IFC policies.<br>• Develop and implement a methodology to conduct periodic outreach to beneficiaries/communities to hold consultations on non-discrimination to identify issues and risks in a safe, ethical, and confidential manner. | throughout the Project implementation. | |
| 10.2 | **PROJECT GRIEVANCE MECHANISM**<br>a) The Project shall develop and maintain a GRM as described in the SEP. The grievance redress arrangement shall be made publicly available to receive and facilitate timely resolution of Project related concerns consistent with ESS10.<br><br>b) The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of GBV/SEA/SH complaints, including through the referral of survivors to relevant GBV service providers, all in a safe, confidential, and survivor-centered manner. The GRCs will be supported to hold meetings to handle the different grievances and any other engagements to manage the grievances at the different levels.<br><br>c) This shall include training and sensitization on the obligations of Project participants to ensure non-discrimination of individuals or groups who are vulnerable or marginalized, including the following measures mentioned above (clause 2.5). | a), b) & c) Within 30 days after the Project Effective Date and thereafter throughout the implementation of such activities. | MoES |

**INDICATORS FOR IMPLEMENTATION READINESS**

11. The following actions are indicators for implementation readiness:

11.1 Maintenance of a functional Project Support Unit (PSU) with dedicated Environmental and Social Development Specialists before the Project Effective Date.

11.2 Submission of a capacity assessment report and capacity building plan acceptable to the Association within sixty (60) days after Project Effective Date and thereafter implement it throughout Project implementation.

11.3 Preparation of training modules and guidelines on non-discrimination, and completion of training for target stakeholders within two months (60 days) after the Project Effective Date.

11.4 Implementation of mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination and exclusion from project benefits within 30 days after the Project Effective Date.

11.5 Preparation and adoption of the LMP within 30 days after the Project Effective Date and before engagement of workers.

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
|---|---|---|
| 11.6 Preparation of GBV/SEA/SH risk response mitigation measures (GBV Plan) within 30 days after the Project Effective Date.<br><br>11.7 Establishment and maintenance of a Project GRM made publicly available to receive and facilitate timely resolution of Project related concerns consistent with ESS10 within 30 days after the Project Effective Date.<br><br>11.8 Preparation and adoption of the Stakeholder Engagement Plan (SEP) prior to the Project appraisal. | | |