

Federal Republic of Nigeria
Ministry of Education

HOPE for Quality Basic Education for All
(P507001)

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

March 4, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the “Recipient”) will implement the HOPE for Quality Basic Education for All Operation, which consists of a Program component and a Project component (the “Project”), with the involvement of the Federal Ministry of Education (“FME”) and the Universal Basic Education Commission (“UBEC”), as set out in the Financing Agreement and the Global Partnership for Education Fund Grant Agreement (collectively, the “Agreements”). The International Development Association (the “Association”) and the International Bank for Reconstruction and Development and the Association, acting as a Grant Agent for the Global Partnership for Education Fund (the “Bank”), have agreed to provide financing for the Operation, as set out in 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 and the Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association and the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Association and the Bank. 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, the Bank, and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association, the Bank, and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association, the Bank and the Recipient’s Representative specified in the Agreements or Coordinating Minister of Education. 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.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|---|--|--|-----------------------|
| IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹ | | | |
| A | <p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain national-level UBEC team comprising UBEC staff and Technical Experts led by Program Manager with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including an environmental specialist, a social specialist, and a GBV specialist.</p> | Hire or appoint one Environmental specialist one social specialist and one GBV specialist no later than three months after the Effective Date and thereafter maintain these positions throughout Project implementation. | UBEC |
| B | <p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> • Training for UBEC Staff and Technical Experts, stakeholders, communities, Project workers on specific areas where training is needed, e.g., stakeholder mapping and engagement, specific aspects of environmental and social assessment, OHS measures including emergency preparedness and response, community health and safety. • The E&S implementation and management in a PforR operation, results verification, consultation, communication, etc. • ESF Fundamentals • GRM Training • Gender-based Violence prevention and response plan • E-waste and Healthcare Waste Management • Traffic management and Incident prevention | Six months after the Effective Date and throughout Project Implementation | SME, SUBEB, FME, UBEC |
| MONITORING AND REPORTING | | | |
| C | <p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. | Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 14 days after the end of each reporting period. | SME, SUBEB, FME, UBEC |

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | <ul style="list-style-type: none"> E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. Number and status of resolution of incidents and accidents reported under action E below. | | |
| D | <p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p> | Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above. | SME, SUBEB, FME, UBEC |
| E | <p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident 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.</p> | <p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p> | SME, SUBEB, FME, UBEC |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |
| 1.1 | <p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>Prepare, consult upon, adopt, disclose, and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Association:</p> <ol style="list-style-type: none"> Stakeholder Engagement Plan (SEP) Labour Management Plan Environmental and Social (E&S) Screening Checklist Environmental and Social Assessment | <p>LMP shall be prepared, disclosed, consulted, and adopted no later than three months after the Effective Date and implemented throughout the Project lifecycle.</p> <p>E&S Screening Checklist shall be developed no later than three months after the Effective Date and implemented by the State PIUs before project implementation to screen sub project activities for E&S impacts.</p> | Program Manager at UBEC |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | | Environmental and Social Assessment report shall be prepared by the National Deputy Program Coordinator (NDPC) and submitted to the Association at the end of each calendar year, no later than 15 th December of each year. | |
| 1.2 | <p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p> | As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request. | Program Manager at UBEC |
| 1.3 | <p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p> | Throughout Project implementation. | Program Manager at UBEC |
| 1.4 | <p>USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Part of the borrowers Labor law shall be used particularly the National Labor Policy on Child labor. The policy clearly specifies what constitute child labor, measures to prevent child labor and the penalty / sanctions for defaulter</p> | Adopt and implement the Nigeria Labor Policy on child labor before engagement of workers and implement it throughout project implementation. | Program Manager at UBEC |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | <p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt, and implement the Labor Management Procedures (LMP) including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (OHS) (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, grievance arrangements for Project workers, and applicable requirements for contracted workers such as Independent Verification Agencies (IVAs) or Monitoring and Evaluation (M&E) consultants, consistent with ESS2.</p> | Prepare the LMP no later than 3months after effectiveness but before engaging project workers, and thereafter implement the LMP throughout Project implementation. | Program Manager at UBEC |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | Ensure that child labor aspects of the labor management and working conditions of Project workers are consistent with this ESCP and with the Recipient's relevant framework, namely Nigeria's policy, legal and institutional framework concerning child labor. | Throughout project implementation | Program Manager at UBEC |
| | Promptly notify the [Bank/Association] of any changes to the [Borrower/Recipient]'s child labor legal and policy framework that may materially adversely affect the [Borrower/Recipient]'s ability to manage the labor risks and impacts of the Project in line with the ESS2 and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the [Bank/Association], such changes adversely affect relevant ESHS risk management aspects of the Project, the [Borrower/Recipient] shall agree to implement measures and actions to address them in a manner acceptable to the [Bank/Association]. The ESCP shall be updated to reflect such agreed actions. | Notify the [Bank/Association] immediately after taking notice of the change to the [Borrower/Recipient]'s E&S Framework. Subsequent actions, if requested by the [Bank/Association], shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP. | Program Manager at UBEC |
| 2.2 | OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Adopt and implement OHS as an annex to the LMP to mitigate risks to the human population and the environment because of transportation of goods and project personnel, e-wastes from procurement of electronic and solar equipment, and minor labor-related risks. | Same timeframe as action 2.1 | Program Manager at UBEC |
| 2.2 | GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. | Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation. | Program Manager at UBEC |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: This standard is not relevant to the project | | | |
| ESS 4: COMMUNITY HEALTH AND SAFETY: This standard is not relevant to the project | | | |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT: This standard is not relevant to the project | | | |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES: This standard is not relevant to the project | | | |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: This standard is not relevant to the project | | | |
| ESS 8: CULTURAL HERITAGE: This standard is not relevant to the project | | | |
| ESS 9: FINANCIAL INTERMEDIARIES: This standard is not relevant to the project | | | |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | | |
| 10.1 | STAKEHOLDER ENGAGEMENT PLAN Prepare, consult upon, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, 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. | Prepare, disclose, consult upon, and adopt the SEP at project effectiveness. Implement the SEP throughout the Project implementation. | Program Manager at UBEC |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|-------------------------------|---|--|--------------------------------|
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> | <p>Establish the grievance mechanism no later than three (3) months after the effective date and thereafter maintain and operate the mechanism throughout Project implementation with support from SERVICOM.</p> | <p>Program Manager at UBEC</p> |

| INDICATORS FOR IMPLEMENTATION READINESS |
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| <p>The following actions are indicators for implementation readiness:</p> <p>Actions = A Action = B Action = 1.1 Action = 2.1 Action = 2.2 Action = 10.2</p> |