



MINISTRY OF EDUCATION

DRAFT ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP) FOR

Secondary Education Transformation for Access, Relevance and Results (STARR-J) Project (P514793)

Appraisal Version

..... March 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The **Republic of Ghana** (the **Borrower**) will implement the Secondary Education Transformation for Access, Relevance and Results (STARR-J)Project (the **Project**), with the involvement of the Ghana Education Service (GES), Technical and Vocational Education and Training (TVET) Service, Centre for National Distance Learning and Open Schooling (CENDLOS), Commission for Technical and Vocational Education and Training (TVET), National Council for Curriculum and Assessment (NaCCA), National Schools Inspectorate Authority (NaSIA), National Teaching Council (NTC), and Ghana Library Authority (GLA), as set out in the Financing Agreement (the **Agreement**). The International Development Association (the **Association**), has agreed to provide financing for the Project, as set out in the Agreement. The Borrower 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
2. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
3. As agreed by the Association and the Borrower 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 and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower's Representative specified in the Agreement Chief Director of Ministry of Education. The Borrower shall promptly disclose the updated ESCP.
4. 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 SUPPORT			
A	ORGANIZATIONAL STRUCTURE a. Establish and maintain a Secretariat for the Project Technical Team (PTT) within the Ministry of Education (MOE), with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project. The PTT at the Secretariat shall include, at minimum, one Environmental Specialist, one Social Specialist and one Gender-Based Violence/ Sexual Exploitation and Abuse/ Sexual Harassment (GBV/SEA/SH) Specialist,	a. Establish and maintain a Secretariat for the PTT, and hire one Environmental Specialist, one Social Specialist, and one GBV/SEA/SH Specialist no later than 3 months after the Project Effective date and thereafter maintain these positions throughout project implementation.	<i>Project Technical Team (PTT) of MOE</i>
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: • Training for the PTT, and designated Regional and District Focal Points to be established, on ESS requirements, including Occupational Health and Safety, incident/accident reporting, resettlement, GBV/SEA/SH, stakeholder engagements, grievance management, code of conduct and labor requirements • Training for contractor and supervision firms E&S and Health and Safety staff on ESS requirements including Occupational Health and Safety, incident/accident reporting, resettlement, GBV-SEA-SH, stakeholder engagements, grievance management, code of conduct and labor requirements • Training for project workers including contractor workers on their obligations including labor, code of conduct and GBV/SEA/SH	Prior to commencement of civil works with refresher training/orientation in the respective districts or as may be determined during project implementation. Prior to commencement of activities by the respective supervision and contractor firms with refresher training/orientation as may be determined during project implementation. Prior to commencement of duty by the respective workers with refresher training/orientation as may be determined during project implementation.	<i>Project Technical Team (PTT) of MOE</i>
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the following: • Status of implementation of the ESCP		<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	- 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), progress made in resolving them, and the outstanding grievances and estimated timelines for addressing them. - E&S performance of contractors and subcontractors as reported through the Supervising Consultants - Number and status of resolution of incidents and accidents reported under action E below.	Submit quarterly reports to the Association throughout Project implementation, commencing 60 days after the project Effective Date. Submit each report to the Bank no later than five (5) days after the end of each reporting period.	
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	Submit the monthly reports to the Bank upon request throughout the Project's implementation period starting from the Effective Date.	<i>Project Technical Team (PTT) of MOE</i>
E	INCIDENTS AND ACCIDENTS 1. Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including 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 gender-based violence (GBV), 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. 2. 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.	1. Notify the Association no later than 48 hours after learning of the incident or accident. Provide details upon request 2. 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.	<i>Project Technical Team (PTT) of MOE</i>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 1. Prepare and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. The ESMF includes an annex on CERC activation and management of E&S impacts and Chance Find procedures.	1. Prepare the ESMF prior to Project Negotiations and thereafter implement the ESMF throughout Project Implementation.	<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Screen subproject activities and specific sub-project locations in accordance with the ESMF. Prepare, adopt, disclose, and implement necessary site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), E&S Audit etc., as needed, consistent with the relevant ESSs and as set out in the ESMF. For such site-specific instruments, submit relevant terms of reference (TORs) for the preparation of these instruments to the Bank for review and clearance. 3. Incorporate the ESMP as part of the respective procurement and bidding documents for the respective project activity that requires the preparation of such ESMP. 4. Prepare and implement Contractor Environmental and Social Management Plans (C-ESMPs), where applicable and consistent with these ESS.	2. Screen subproject activities and specific sub-project locations and prepare ESMP for subproject activities that require the preparation of such ESMP prior to commencement of bidding process for sub-projects. Once finalized, implement the respective ESMP throughout Project implementation. 3. Prior to launching the procurement process for the respective activity. 4. Prior to commencement of the respective Project activity and thereafter implement throughout Project implementation	<i>Project Technical Team (PTT) of MOE and Contractors</i>
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant ESMPs, the Labor Management Procedures, and code of conduct, into the ESHS 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.	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	<i>Project Technical Team (PTT) of MOE</i>
1.3	TECHNICAL ASSISTANCE Carry out consultancy, 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.	Throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
1.4	CONTINGENT EMERGENCY RESPONSE FINANCING 1. Prepare CERC activation E&S management procedures as an annex to the project ESMF under 1.1 (1) above.	1. preparation of CERC ESMF annex within the same timeline as ESMF under 1.1 above and, if applicable,	<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Implement the E&S provisions of the CERC Manual and the CERC ESMF annex in accordance with the ESS and the provisions of this ESCP.	other E&S documents, as relevant in form and substance acceptable to the Association is a withdrawal condition under Section [xx] of the legal agreement. 2. In accordance with the timeframe specified in the CERC manual and any assessments and plans required therein	
1.5	ASSOCIATED FACILITIES Not applicable.	N/A	N/A
1.6	USE OF BORROWER'S ENVIRONMENTAL AND SOCIAL FRAMEWORK Not applicable. The project will not use the Borrower's Framework either in part or whole as this is a substantial risk project and will rely on the World Bank Environmental and Social Framework	N/A	N/A
1.7	COMMON APPROACH Not applicable. This project does not involve other financing partners, and as such, a common approach will not be used.	N/A	N/A
1.8	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING Not applicable. No existing facilities or activities are subject to retroactive financing.	N/A	N/A
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare and implement the Labor Management Procedures (LMP) for the Project	Prepare the LMP prior to Project Effective Date, and thereafter implement the LMP throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare and implement an OHS Management Plan as part of the ESMF in 1.1 above, to assess and manage the OHS risks and impacts of the Project. AND Require contractors and subcontractors to prepare and implement OHS Management Measures as part of the Contractor's Environmental and Social Management Plans (C-ESMP), in accordance with the subproject's Environmental and Social Management Plan (ESMP).	Prepare the OHS Management Plan as part of ESMF within the same timeline as ESMF under 1.1 above, and thereafter implement the plan throughout Project implementation. Prior to commencement of civil works and thereafter implement the plan throughout project implementation period.	<i>Project Technical Team (PTT) of MOE</i> Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	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.	<i>Project Technical Team (PTT) of MOE and Contractors</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the relevant ESMPs to be prepared under the Project, to manage hazardous and non-hazardous waste, consistent with ESS3. And Require contractors and subcontractors to prepare and implement Waste Management Measures as part of the Contractor's Environmental and Social Management Plans (C-ESMP), in accordance with the subproject's Environmental and Social Management Plan (ESMP).	Prepare the WMP as part of the relevant ESMPs, within the same timeline as the ESMPs under 1.1 above, and thereafter implement the WMP throughout Project implementation. Prior to commencement of civil works and thereafter implement the plan throughout project implementation period.	<i>Project Technical Team (PTT) of MOE</i> Contractors
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the relevant ESMPs to be prepared under action in 1.1 above and as follows: • Include measures based on the World Bank Group EHS Guidelines. • Ensure that these measures are detailed in Contractor's Environmental and Social Management Plans (ESMPs) to be prepared during project implementation as necessary. Ensure all service providers have environmental and social requirements written into their contracts, including the safe handling, storage, and disposal of hazardous substances.	same timeframe as for the preparation and implementation of the ESMPs.	<i>Project Technical Team (PTT) of MOE and Contractors</i>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic, including child-safe traffic management in school environments, and overall road safety risks as required in the relevant ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMPs.	<i>Project Technical Team (PTT) of MOE and Contractors</i>
4.2	COMMUNITY HEALTH AND SAFETY	Same timeframe as for the preparation and implementation of the ESMPs.	<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, behavior of Project workers, risks of labor influx, potential risk of disease spread such as HIV/AIDS and STDs, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.		
4.3	SEA AND SH RISKS Prepare and implement a GBV/SEA/SH Action Plan to assess and manage the risks of GBV, SEA and SH.	Prepare the GBV/SEA/SH Action Plan prior to the Project Effective Date, and thereafter implement the GBV/SEA/SH Action Plan throughout Project implementation, but before civil works commence.	<i>Project Technical Team (PTT) of MOE</i>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK 1. Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. No civil works shall commence on any site until land access has been formally secured and verified in accordance with the RPF. RPF will also address legacy and historical land claims, and documentation gaps. 2. Prepare and implement a Resettlement Action Plan (RAP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RAP or LRP is required, as set out in the RPF and consistent with ESS5.	1. Prepare the RPF prior to project Negotiations, and thereafter implement the RPF throughout Project implementation. 2. Prepare and implement the respective RAP or LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable, displaced people have been resettled and moving allowances have been provided.	<i>Project Technical Team (PTT) of MOE</i>
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS 1. Screen all candidate sites early against ESS6 to identify sensitivities and use the results to inform site selection; apply the mitigation hierarchy, by prioritizing avoidance. 2. Prepare site-specific ESMPs and include biodiversity measures as needed; include ESS6 requirements in bidding documents; finalize ESMPs before mobilization; implement and monitor during construction; restore post-construction.	Prepare BMPs as standalone documents (where relevant) or as part of the ESMPs in 1.1 above, within the same timeline as the ESMPs, and thereafter implement the BMP throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN Not Relevant. This is because the proposed activities will be implemented across Ghana's 16 regions, none of which contain communities that meet the criteria for Sub-Saharan African Historically Underserved Traditional Local Communities as defined under the ESS7 standard.		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMPs to be prepared, consistent with ESS8.	Prepare the CHMP as part of the ESMPs in 1.1 above, within the same timeline as the ESMPs, and thereafter implement the CHMP throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
8.2	CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESMF of the Project.	Describe the chance find procedures in the ESMF. Implement the procedures throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not applicable. The Project does not involve the use of Financial Intermediaries (FIs)	N/A	N/A
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare 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 the SEP prior to project Appraisal and thereafter implement the SEP throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
10.2	PROJECT GRIEVANCE MECHANISM 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. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of Child Labor and GBV/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.	Establish the grievance mechanism prior to Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
INDICATORS FOR IMPLEMENTATION READINESS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
The following actions are indicators for implementation readiness: A – Organizational Structure - Establishment of the Project Secretariat and recruitment of the Environmental Specialist, Social Specialist, and GBV/SEA/SH Specialist, as part of setting up the Project Technical Team (PTT). B – Capacity Building Measures - Initial ESF, OHS, GBV/SEA/SH, and GRM training completed for PTT and designated regional/district focal points. 1.1 – Environmental and Social Management Framework (ESMF) - ESMF prepared, cleared, disclosed, including screening procedures, exclusion list, OHS, chance finds, and CERC annex. 5.1 – Resettlement Policy Framework (RPF) - RPF prepared, cleared, and disclosed prior to negotiations. 2.1 – Labor Management Procedures (LMP) - LMP prepared and disclosed prior to effectiveness, including worker GRM and child labor provisions. 4.3 – GBV/SEA/SH Action Plan - GBV/SEA/SH Action Plan prepared, and initial systems operationalized prior to commencement of civil works. 10.1 – Stakeholder Engagement Plan (SEP) - SEP prepared, cleared, and disclosed prior to Appraisal. 0.2 – Project Grievance Mechanism - Project and sector-wide GRM established, publicized, and functional, including confidential GBV/SEA/SH handling.		