

**THE REPUBLIC OF MALDIVES /
MINISTRY OF EDUCATION (MOE)
Atoll Education Development Project
Additional Financing (P177768)**

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

October 21, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Maldives (the Recipient) is implementing the Maldives Atoll Education Development Project (AEDP) (the Project), with the involvement of the Ministry of Education (MoE), as set out in the Financing Agreement and in the Agreement providing for the additional financing referred to below (together, the Agreements). The International Development Association (the Association) agreed to provide the original financing for the Project and, acting as administrator of the Global Partnership for Education Trust Fund (GPE), has further agreed to provide the additional financing for the Project, as set out in the Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
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 Agreements. 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, 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 ESS, 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 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 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 Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Senior Policy Executive, Policy and Planning of the MoE. 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 [The actions listed below are illustrative. See further details in the "NOTE" in each box. Delete, adjust, or add actions, as needed].		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a OMSU with qualified staff and resources to support management of environment and social risks and impacts of the Project.</p> <p>Environmental and Social Focal points need to be identified for the project permanently.</p>	<p>An Environmental and Social Specialist should be appointed within 90 days of the project effectiveness date and would be responsible for the execution of the project.</p> <p>Maintain as necessary throughout project implementation.</p>	MOE
	<p>Data Security: An assessment will be conducted of Maldivian data security legislation, capacity to enact, and recommend mitigations measures needed in new EMIS. Development of EMIS will factor in data security measures needed to ensure confidentiality of collected information, which includes students, parents, teachers, and staff.</p>	<p>Assessment conducted as part of EMIS planning to inform Development, Launching, and Operation of the EMIS system.</p>	Operations and Monitoring Support Unit (OMSU), MoE
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>CS 1: Training may be required for:</p> <ul style="list-style-type: none"> • Introduction to ESF and ESMF implementation • Stakeholder mapping and engagement • Specific aspects of environmental and social assessment • Occupational health and safety • Labor management procedures • Emergency preparedness and response • SEA/SH prevention and response 	<p>Throughout Project implementation (Completion Status to be updated during project implementation)</p>	OMSU, MoE
	<p>CS2: Training on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	<p>Throughout Project implementation (Completion Status to be updated during project implementation)</p>	OMSU, MoE Contractor
	<p>CS3: Mandatory training pertaining to data collection and data security including measures required for data protection and privacy.</p>	<p>Throughout Project implementation (Completion Status to be updated during project implementation)</p>	OMSU, MoE Contractor
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit regular monitoring reports on the implementation of the ESCP. Prepare & submit to the Association regular monitoring reports on the environmental, social, health and safety issues & performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Every three months during the operation's implementation in conjunction with the Project's progress reports.</p>	Project Environmental and Social Specialist, OMSU and MoE

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	<p>Collaborate with other agencies and third parties, such as all Implementing Agencies (IAs) and contractors, who are responsible for managing specific risks and impacts and implementing mitigation measures to establish such mitigation measures to gather inputs for reporting.</p> <p>MONITORING OF E-WASTE GUIDELINE: A status update of the implementation of the E-waste guidelines will be prepared and submitted as per the agreed timeline.</p>	<p>Quarterly reports will be prepared based on the contractor's monthly reports</p> <p>A status update will be submitted as part of the monitoring report in every 6 months</p> <p>Submit each report to the [Association no later than [07] days after the end of each reporting period].</p>	
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Contractors and supervising firms to provide monthly monitoring reports on environment and social 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 OMSU and, upon request, to the Association	Contractor, OMSU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>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 sexual exploitation, abuse, or harassment (SEAH), and accidents that result in death, serious or multiple injury.</p> <p>Provide sufficient detail 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Within three days of the incident/accident taking place</p> <p>Provide subsequent report to the Association within seven days of the incident/accident taking place.</p>	Environmental and Social Safeguards Specialist, OMSU; MoE and the Contractors
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Adopt and implement an Environment and Social Management Framework (ESMF), consistent with the relevant ESSs and corresponding Environmental and Social Management Plan (ESMP), consistent with the relevant ESSs.</p>	1. Prepare, seek Association clearance, and adopt the ESMF prior to project commencement, and thereafter implement the ESMF throughout Project implementation.	MoE

MATERIAL MEASURES AND ACTIONS [The actions listed below are illustrative. See further details in the "NOTE" in each box. Delete, adjust, or add actions, as needed].		TIMEFRAME	RESPONSIBLE ENTITY
		2. ESMPs prepared, acceptable to the Association, before launching the bidding process for any civil works as appropriate, and thereafter implemented through the execution of works. Bidding documents will include provisions for contractors in line with ESMF and ESMP prepared for the Project activity.	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, 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 cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Monitor and Supervise contractors throughout Project implementation</p>	OMSU
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), 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.	OMSU, MoE
1.4	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>a) Ensure that the ESMF of AEDP is amended at the time of CERC activation and includes a description of the ESHS assessment and management arrangements for the implementation of CERC component 5 of AEDP in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments that may be required for activities under component 5 of the AED Project, in accordance with the ESMF Addendum once the CERC is activated and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of ESMF in form and substance acceptable to the Association is a withdrawal condition under Section III.B(i)(b) of Schedule 2 to the Financing Agreement.</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out the relevant Project activities</p>	MoE

MATERIAL MEASURES AND ACTIONS [The actions listed below are illustrative. See further details in the "NOTE" in each box. Delete, adjust, or add actions, as needed].		TIMEFRAME	RESPONSIBLE ENTITY
		for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
1.5	ASSOCIATED FACILITIES Currently not relevant		
1.6	USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK <ul style="list-style-type: none"> a) Ensure that the E&S risks and impacts of the Project, are managed in accordance with this ESCP and the recipient's E&S Framework, which includes, inter alia, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions and applicable laws, regulations, procedures, and implementation capacity. b) Promptly notify the Association of any changes to the Recipient's E&S Framework that may materially adversely affect the Recipient's ability to manage the E&S risks and impacts of the Project in line with the ESSs 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 Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions. 	<ul style="list-style-type: none"> a. Throughout project implementation b. Notify the Association immediately after taking notice of the change to/Recipient's E&S Framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP. 	OMSU, MoE
1.7	COMMON APPROACH Currently not relevant		
1.8	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING Currently not relevant		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), data security and protection, forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Monitored throughout project implementation	MoE, contractor, consultant
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN		

MATERIAL MEASURES AND ACTIONS [The actions listed below are illustrative. See further details in the "NOTE" in each box. Delete, adjust, or add actions, as needed].		TIMEFRAME	RESPONSIBLE ENTITY
	Currently not relevant		
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, that is also gender sensitive and responsive to SEA/SH</p>	Engage and train project workers throughout project implementation. Maintaining GRM including monitoring and reporting throughout Project implementation.	Contractor, consultant, MoE
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>E-WASTE MANAGEMENT GUIDELINE:</p> <p>The E-waste guideline will be prepared as part of the ESMF indicating all measures to be undertaken during the life cycle use of all electronic equipment purchases via the project. Measures on management include identification of energy efficient equipment, recycling and reuse where possible and buyback and service management with suppliers and sellers.</p> <p>All minimum standards and guidance will be provided in the E-waste guide and followed during project implementation during the procurement and use of electronic equipment.</p>	Prepare the E-Waste Management Guideline as part of the ESMF prior to negotiations and thereafter implement throughout Project implementation.	MoE, Contractor
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMF.</p>	Prior to contract implementation	MoE
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks.</p>	Traffic and road safety measures will be included in the project ESMF and implemented as part of the ESMPs throughout project implementation.	MoE
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including in relation to Project Workers and any risks of labor influx, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p> <p>TRAINING FOR THE COMMUNITY: Conduct training for the community designed to heighten awareness of risks and to mitigate impacts specified in this section.</p>	Occupational health and safety and community health and safety measures will be included in the project ESMF and implemented throughout project implementation.	MoE
4.3	<p>SEA AND SH RISKS</p> <p>SEA/SH risks are low. SEA/SH will be included in Code of Conduct.</p>	Throughout implementation of civil works	The contractor, the consultant

MATERIAL MEASURES AND ACTIONS [The actions listed below are illustrative. See further details in the "NOTE" in each box. Delete, adjust, or add actions, as needed].		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, [specify plans or include a reference to the instrument where such measures are reflected, as needed, e.g. as set out in the ESMP or Security Management Plan], guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p> <p>EMIS activities implemented by the Project will include conducting an assessment of the Maldives' legal framework pertaining to personal data protection and privacy. If gaps are identified, the assessment will provide recommendations and mitigation measures to ensure adequate measures are in place to protect personal data in accordance to International Good Practices.</p> <p>The staff involved in managing the EMIS will receive comprehensive training in data protection and security. This training will cover best practices in data handling, recognizing and mitigating security risks, and ensuring compliance with data protection regulations. Continuous training and capacity-building initiatives will be in place to keep the staff updated on emerging security threats and evolving data protection standards</p>	<p>Prior to engaging security personnel/ prior to initiating construction. Implemented throughout Project implementation.</p> <p>During the development of the EMIS, when the scope and contents of the EMIS has been mapped out.</p> <p>During the development of the EMIS.</p>	<p>The contractor, the consultant</p> <p>MoE</p> <p>MoE</p>
4.5	<p>DAM SAFETY (FOR ANNEX A ESS4)</p> <p>Currently not relevant</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]</p> <p>Currently not relevant</p>		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Currently not relevant</p>		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]</p> <p>Currently not relevant</p>		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>The ESMPs to be prepared (action 1.2) will incorporate chance find procedures in case valuable artefacts or culturally valuable materials are found during project implementation. Prior to commencement of each sub-project and maintained during construction</p>	Throughout project implementation	MoE
8.2	<p>CHANCE FINDS</p>	Throughout project implementation	MoE

MATERIAL MEASURES AND ACTIONS [The actions listed below are illustrative. See further details in the "NOTE" in each box. Delete, adjust, or add actions, as needed].		TIMEFRAME	RESPONSIBLE ENTITY
	The ESMPs to be prepared (action 1.2) will incorporate chance find procedures in case valuable artefacts or culturally valuable materials are found during project implementation. Prior to commencement of each sub-project and maintained during construction		
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	Currently not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>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.</p> <p>Currently there is a policy at the MoE regarding the usage of Maldives Education Management Information System. This policy will be revised and adopted as the policy for the new EMIS. This policy will be translated into English to ensure consistency and accessibility for all stakeholders involved in the development and management of the new system.</p>	<p>SEP updated and disclosed prior to appraisal of the additional financing for the Project.</p> <p>Applicable throughout Project implementation until project closure</p>	<p>OMSU. MoE</p> <p>MoE</p>
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 prior to appraisal, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>OMSU, MoE</p>
INDICATORS FOR IMPLEMENTATION READINESS:			
<p>The following actions are indicators for implementation readiness:</p> <p>E&S Specialist is appointed at the OMSU</p> <p>2.1: Labor Management Procedures publicly disclosed. All project employees and contracted employees sign Code-of-Conduct.</p> <p>10.1: Stakeholder Engagement Plan publicly disclosed and a link to SEP sent to all schools impacted by the project.</p> <p>10.2: Grievance Redress Mechanism established. All schools impacted by the project are made aware of GRM system.</p>			