



Republic of Rwanda  
Ministry of Education

**PROJECT:**

**RWANDA QUALITY BASIC EDUCATION FOR  
HUMAN CAPITAL DEVELOPMENT**

**UPDATED ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP) FOR SECOND  
ADDITIONAL FINANCING**

**April, 2022**

## MINISTRY OF EDUCATION

### PROJECT: QUALITY BASIC EDUCATION FOR HUMAN CAPITAL DEVELOPMENT IN RWANDA – P168551

#### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Ministry of Education (MINEDUC) is implementing the Rwanda Quality Basic Education for Human Capital Development Project (the Project), with the involvement of the following Ministries/agencies/units: Ministry of Finance and Economic Planning, Ministry of Local Government (Districts), Rwanda Basic Education Board, University of Rwanda-College of Education and RDB. The rationalization of public institutions of 2020 has transferred the responsibilities related to school inspection from MINEDUC to National Examination and School Inspection (NESA). This has made NESA another institution involved in the implementation of Rwanda Quality Basic Education for Human Capital Development Project. The International Development Association (IDA) has agreed to provide financing for the Project.
2. The project is being delivered through three main components as agreed at the time of appraisal but in April 2020 an additional fourth component was added as result of the Rwanda education response action to tackle the effect of school closures as a result of the COVID-19 pandemic. Those components are i) enhancing teacher effectiveness for improved student learning, ii) improving the school environment to support student learning, iii) developing institutional capacity to strengthen teaching and learning and finally iv) supporting the national COVID-19 response for continued learning, recovery, and resilience in education sector.
3. The Ministry of Education will implement the 2<sup>nd</sup> Additional Financing (AF) to Rwanda Quality Basic Education for Human Capital Development Project that will focus on the provision of rainwater tanks and construction of retaining walls on sites where classrooms and latrines have been constructed to ensure that school infrastructures in place are climate resilient. The AF will also focus on construction/upgrading Teacher Training Centers (TTCs) and Model Schools to ensure the availability of required infrastructure to accommodate the substantial number of students needed to fill the gap caused by teachers who have retired as well as the increase of additional classrooms that also increase the demand of teachers. Additionally, TTCs are facing an increase in enrollment due to the high volume of students who are joining TTCs as a result of the provision of new professional incentives and career pathways for teachers, as well as the tuition fees for TTCs being highly subsidized by the Government (50% subsidy based on the average of current TTCs fees).
4. The provision of rainwater tanks and construction of retaining walls will be under existing sub-component 2.1 (***Reduce overcrowding and distance to schools***) while upgrading TTCs and Model Schools are existing subcomponents of strengthening preparation of new teachers (1.3) and developing model schools to support innovative instructional practices (1.4) respectively.
5. The Ministry of Education is implementing material measures and actions so that the Project is being implemented in accordance with the World Bank Environmental and Social Standards

(ESSs). This Environmental and Social Commitment Plan (ESCP) sets out a summary of the material measures and actions.

6. In particular, the updated ESCP requires compliance with the provisions set out in the Environmental and Social Management Framework (ESMF), resettlement Policy Framework, Specific Environmental and Social Impact Assessment (ESIA) reports, specific Environmental and Social Management Plans, Occupational Health and Safety Management plans, that will be updated or developed for the project.
7. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. The Ministry of Education is responsible for compliance with all requirements of the updated ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1 above.
8. Implementation of the material measures and actions set out in this updated ESCP will be monitored and reported to the World Bank by the Ministry of Education as required by the ESCP and the conditions of the legal agreement, and the World Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
9. As agreed by the World Bank and Ministry of Education, this updated 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 Ministry of Education will agree to the changes with the World Bank 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 World Bank and the Ministry of Education. The Ministry of Education will promptly redisclose the updated ESCP. Depending on the project, the updated ESCP may also specify the funding necessary for completion of a measure or action.
10. Where the Project changes due to unforeseen circumstances, or if Project performance result in changes to the risks and impacts during Project implementation, the Ministry of Education shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

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<i>Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts</i>	<i>Timeframe</i>	<i>Responsibility / Authority and Resources/Funding Committed</i>	<i>Date of Completion</i>
<b>ESCP Monitoring and Reporting</b>			
<p><b>REGULAR REPORTING:</b></p> <p>Prepare and submit regular environmental and social monitoring reports on environmental, social, health and safety (ESHS) performance of the project implementation, stakeholder engagement activities and grievances redress mechanism including the activities under additional financing, in accordance with legal agreement, including the requirements of ESCP, and ESSs.</p> <p>More elaborates aspects of monitoring and reporting will be provided in ESIA, and updated RPF and the updated ESMF.</p> <p>GEMS data collection has been used under the parent project to collect data at school construction sites in order to track the progress of the school construction activities as well as their compliance with Environmental and Social Standards of the World Bank and Rwanda Environmental regulation.</p> <p>GEMS data collection will continue to be used in the monitoring of AF activities and MINEDUC/PIU staffs are familiar with it.</p>	<p>Quarterly (every 3 months) and annually, throughout the project implementation.</p> <p>June 2022</p> <p>Through the project implementation</p>	<p>MINEDUC/SPIU, Schools &amp; Districts' Contractors.</p> <p>Monitoring costs to be incorporated in the overall project management costs.</p>	<p>Throughout the Project implementation</p>
<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION</b></p> <p>The following will be given ultimate priority:</p> <ul style="list-style-type: none"> <li>✓ Promptly inform the Association within 24 hours of any incident or accident related to or affecting the Project that has</li> </ul>	<p>Any incident or accident shall be notified immediately after</p>	<p>Contractor, Districts,</p>	<p>Throughout the Project</p>

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<p>or is likely to have a serious impact on the environment, affected communities, the public, or workers, including, but not limited to, any allegations of gender-based violence and/or sexual exploitation, abuse and harassment (GBV/SEA-HS), Project-related, work-related accidents or fatalities, worker strikes, and social unrest.</p> <ul style="list-style-type: none"> <li>✓ Provide sufficient details of the incident or accident, indicating the measures taken or to be taken to address it and all the information made available by any contractor, supplier or service provider and by the supervising entity, as applicable". For all GBV/SG/SEA incidents, the Bank needs to be notified.</li> <li>✓ A report of the incident shall be submitted, detailing summary findings of the Root Cause Analysis (RCA).</li> <li>✓ An incident register shall be maintained at all construction sites, throughout the duration of the works.</li> </ul>	<p>occurrence. Fatalities will be reported within 24 hours after occurrence.</p>	<p>MINEDUC/SPIU</p> <p>Implementation funding to be part of the EMPs budgets</p>	<p>implementation</p>

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<b>SUMMARY ASSESSMENT</b>			
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
<p><b>1.1 ORGANIZATIONAL STRUCTURE:</b></p> <p>Establish an organizational structure with qualified staff to support management of E&amp;S.Environment Safeguard Specialist and Social Specialist based at the MINEDUC/PIU level and 15 E&amp;S based at District level.</p> <p>The environmental and social management issues in MINEDUC and its implementing partners will be handled by MINEDUC Safeguard Team under supervision of SPIU Coordinator in the Ministry of Education.</p> <p>In order to fill the gap observed in structure of MINEDUC/PIU, the recruitment process of missing safeguard staff namely one Environmental safeguard Specialist to be based at central and 9 Environmental and Social Safeguard Officers to be based at District level is ongoing. Currently, the Environmental Safeguards Specialist is on board and 9 Environmental and Social Safeguards Officers will be on board in May 2022.</p>	<p>The staff shall be in place 2 months before commencement of the parent project effectiveness (August 2019) and additional financing effectiveness</p> <p>Maintained as necessary throughout Project implementation.</p> <p>May 2022</p>	<p>MINEDUC/SPIU, recruitment of the requisite to be done under component 3, within the framework of funds allocate in the project budget.</p>	<p>July 1<sup>st</sup> 2019</p> <p>Throughout the Project implementation</p>

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	Appoint focal person from MINEDUC/PIU staff to support PIU on social issues such as disability inclusion and GBV	June 2022		June 2022
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</b></p> <p>Carry out specific environmental and social assessment, in accordance with existing legal instruments related to Environmental Impact Assessment, to identify and assess the specific environmental and social risks and impacts of the Project and appropriate mitigation measures.</p> <p>The following have been prepared:</p> <ul style="list-style-type: none"> <li>- Resettlement Policy Framework (RPF) for the parent Project that will be updated to accommodate the land acquisition issues related to the AF</li> <li>- Environmental and Social Management Framework (ESMF) of the parent Project that will be updated to accommodate the potential environmental and social risks and impacts of the AF</li> <li>- Prepare Environment and Social Impact Assessment (ESIA/ESMP) and seek Rwanda Development Board (RDB) EIA or ESMP clearance before the start of civil works</li> </ul>	<p>Before appraisal of the parent Project as well as AF.</p> <p>June 2022</p> <p>June 2022</p> <p>Before commencement of any civil works as appropriate</p>	MINEDUC/SPIU Consultants	Through the Project implementation

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	<p>- All subprojects associated with the works (new classroom construction, rehabilitation, new school construction, toilet facilities, water points etc) must be systematically screened from both environment and social standpoint.</p>			
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS:</b></p> <p>There will be development and implementation of specific environmental and social management plans based on the particularity of each site considering existing environmental features. Once prepared, the plans will be prepared and cleared prior to commencement of works, throughout Project implementation.</p> <p>The following tools, incorporating management related to the AF, will be developed and implemented:                      OHS management plan                      Labour Management procedures                      Site rehabilitation plan                      Grievance management plan                      Screening tool for all subprojects.</p>	<p>November 2019 for the parent Project, May 2022 for TTCs and Model Schools.</p> <p>For retaining walls and water tanks existing ESMPs will be updated before commencement of civil works. Note that retaining walls and rain water tanks related activities will be done on sites where environmental and social impact assessments have been conducted previously.</p>	<p>MINEDUC/SPIU, District &amp; Schools</p>	<p>Idem                      July 1<sup>st</sup> 2019 for the first sets of construction works.</p> <p>The rest of the construction activities will be preceded by approved plans.</p>

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1.4	<p><b>MANAGEMENT OF CONTRACTORS:</b></p> <p>The project implementation will involve implementing partners such as districts and respective schools. To ensure coordination for successful implementation of the project, the Ministry of Education will establish measures which include, but not limited to:</p> <ul style="list-style-type: none"> <li>a) Assessment of the environmental and social risks and impacts associated with contracts of suppliers;</li> <li>b) Ascertain that implementing partners have adequate human resource with knowledge and skills to perform their project tasks in accordance with their commitments;</li> <li>c) Incorporate all relevant aspects of the ESCP into tender documents;</li> <li>d) Officially require implementing partners to apply the relevant aspects of the updated ESCP and the relevant management tools;</li> <li>e) Monitor implementing partners and their associates' compliance with their commitments;</li> <li>f) Require implementing partners to have equivalent arrangements with their subcontractors.</li> <li>g) <i>All implementing partners to have Environment and Social Staff</i></li> <li>h) <i>Ensure that GBV code of conduct are included in service providers tender documents in accordance with national laws and the bank ESF requirements.</i></li> </ul>	<p>Development of procedures: November 2019</p> <p>Implementation: whole life of the project.</p>	<p>MINEDUC/SPIU REMA Districts</p>	<p>During the project implementation timeframe</p>

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1.5	<p><b>PERMIT, CONSENTS AND AUTHORIZATIONS:</b></p> <p>Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.</p> <p>Prior to the commencement of any construction activities, the Ministry shall obtain an Environmental and Social Impact Assessment Certificate from the relevant authority; building permits from One Stop Centers in their respective District, and any necessary permits, consents and authorizations for contractors, in accordance with relevant laws.</p> <p>All suppliers of raw-materials such as sand, stones, bricks, timber and other relevant construction should be authorized with legal documents to operate.</p> <p>Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</p>	<p>ESIA Certificate: before the commencement of construction works subject to ESIA;</p> <p>Other permits, consents and authorizations: before commencement of related Project activities;</p> <p>Implementation and compliance: throughout the Project life</p>	<p>MINEDUC, RDB, Contractors and Districts</p>	<p>Throughout project implementation.</p>
1.6	<p><b>THIRD PARTY MONITORING:</b></p> <p>✓ Monitoring of environmental and social hazards and their impacts on the project-affected communities and workers will continuously be monitored by Rwanda Environment Management Authority (REMA), to ensure effective compliance in accordance with ESIA</p>	<p>Continuous throughout the Project period</p>	<p>MINEDUC/SPIU, REMA, Contractors, Districts, Sectors</p>	<p>Throughout the project implementation</p>

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	<p>conditions of approval.</p> <ul style="list-style-type: none"> <li>✓ Regular inspections will be done by other relevant Institutions/One stop Centers to monitor and make sure that the project is complying with national buildings codes.</li> <li>✓ Concerned local government authorities shall carry out routine monitoring and inspection to ensure comprehensive compliance in accordance with Environmental, social and health aspects of the project to the community.</li> </ul>	According to their plan: routine		
1.7	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project (see the details of ESIA and ESMF)</i>			
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>				
2.1	<p><b>LABOR MANAGEMENT PROCEDURES:</b> Update the LMP to reflect the AF activities The labor management procedures shall be done through the following actions:</p> <ul style="list-style-type: none"> <li>- Provide information to workers regarding their terms of employment. The information will set out their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation and benefits;</li> <li>- Provide workers with adequate periods of rest per week, annual holiday and sick leave, as required by national law;</li> <li>- Ensure Non-Discrimination and Equal Opportunity in the project;</li> <li>- Set out measures to prevent and address harassment, intimidation</li> </ul>	Update LMP, before the appraisal of AF Continuous throughout the project period	MINEDUC/SPIU, Contractors, Districts	1 <sup>st</sup> March 2022 for AF

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	<p>and/or exploitation in human resources policies and procedures;</p> <ul style="list-style-type: none"> <li>- Ban the use or support of child, forced or compulsory labor.</li> <li>- Workers should have signed contracts with clear terms as per the Rwanda Labor law and the LMP.</li> <li>- Ensure the signing of contracts and Codes of Conduct by the contractors, in accordance with LMP guideline.</li> <li>- As it has been done during the implementation of the parent project, People with disabilities will be employed as well in the implementation of AF and they will be given tasks that correspond to their capacity.</li> </ul>			
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b></p> <p>The process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances regarding the environmental and social performance will respect the following:</p> <ul style="list-style-type: none"> <li>✓ The grievance mechanism will be scaled to the risks and potential adverse impacts of the project.</li> <li>✓ Where possible, grievance mechanism will utilize existing formal or informal grievance mechanisms suitable for project purposes.</li> <li>✓ The grievance mechanism, process or procedure shall address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all segments</li> </ul>	<p>By November 2019, the GRCs should be established and operationalized</p> <p>The AF will use the established GRM of the parent project to handle and resolve all project related complaints.</p> <p>So far, 458 GRCs have been established for phase I at grassroots level, while 942 GRCs have been established for phase II at grassroots level for</p>	<p>MINEDUC/SPIU, Contractors, Districts</p>	<p>Throughout the project implementation</p>

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	<p>of workers at no cost and without retribution.</p> <ul style="list-style-type: none"> <li>✓ The mechanism, process or procedure will not prevent access to judicial or administrative remedies.</li> <li>✓ Workers will be informed about the grievance process in the course of its community engagement or stakeholders' engagement activities, and will make publicly available a record documenting the responses to all grievances received.</li> <li>✓ Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the workers.</li> <li>✓ The mechanism will include a dedicated channel to receive and manage GBV/SEA &amp; SH related grievances.</li> </ul>	<p>the parent project.</p> <p>For additional financing, there will be no new mechanism created, the team will focus on strengthening and updating the existing mechanism to continue providing support on handling complaints related to the project implementation.</p>		
2.3	<p><b>OHS MEASURES:</b></p> <p>Update the Occupational Health and Safety (OHS) of the parent Project to reflect the activities of AF.</p> <p>The relevant OHS provisions in the General EHSs will be applied to the project, and this requirement will be set out in the legal agreement and the updated ESCP.</p> <p>Measures will be designed and implemented, in accordance with national law and the EHSs, to address:</p> <ul style="list-style-type: none"> <li>❖ Identification of potential hazards to project workers, particularly those that may be life-threatening.</li> </ul>	<p>Throughout the execution of the Project.</p>	<p>MINEDUC/SPIU, Contractors, District Funded under the EMPs budget</p>	<p>During the project implementation timeframe</p>

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<ul style="list-style-type: none"> <li>❖ Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;</li> <li>❖ Training of project workers and maintenance of training records; Documentation and reporting of occupational accidents, diseases and incidents;</li> <li>❖ Emergency prevention, preparedness and response arrangements.</li> <li>❖ Potential exposure of workers to asbestos.</li> </ul> <p><b>Applicability and Approach:</b></p> <ul style="list-style-type: none"> <li>✓ Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers.</li> <li>✓ The contractor will hire a technical staff capable to manage the occupational health and safety issues of their employees,</li> <li>✓ Preventive and protective measures will be introduced according to OHS management plan</li> </ul> <p><u>Prevention of COVID-19</u></p> <p>Project staff and supervisor to ensure that all workers are in good health condition and in case of COVID- symptoms to notify the authority and otherunits in charge of public health. Develop, adopt and implement specific provisions relating to health measures in order to face pandemics such as COVID-19 for Project workers, and include these measures in the ESMPs to be drawn up, in application of the ESMF and in a satisfactory manner to the</p>	<p>Throughout Project implementation</p>	<p>MINEDUC</p>	

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	Association			
2.4	<p><b>EMERGENCY PREPAREDNESS AND RESPONSE:</b></p> <p>As part of the OHS measures specified in 2.3, include measures on emergency preparedness and response, and ensure coordination with measures under 4.5.</p> <ul style="list-style-type: none"> <li>✓ Measures to address incidents will be identified and designed to prevent unanticipated incidents from injuring the health and safety of the affected community, and to minimize, mitigate and compensate for any impacts that may occur. The following measures will be put in place;</li> <li>✓ Carry out the Risk Hazard Assessment (RHA), as part of the Environmental and Social Assessment;</li> <li>✓ Prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected community.</li> </ul> <p><b><i>The emergence Preparedness and Response will include:</i></b></p> <ul style="list-style-type: none"> <li>- engineering controls (such as containment, automatic alarms, and shut-off systems) commensurate with the nature and scale of the hazard;</li> <li>- identification of and secure access to emergency equipment</li> </ul>	Prior to initiating construction. Maintained throughout Project implementation.	MINEDUC/SPIU, Contractors, Districts  Funded under the EMPs budget	Throughout the project implementation

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	<p>available on-site and nearby;</p> <ul style="list-style-type: none"> <li>- notification procedures for designated emergency responders;</li> <li>- Training program for emergency responders including drills at regular intervals;</li> <li>- Public evacuation procedures;</li> <li>- Designated coordinator for ERP implementation;</li> <li>- Measures for restoration and clean-up of the environment following any major accident;</li> <li>- Documentation of emergency preparedness and response activities, resources, and responsibilities.</li> </ul>			
2.5	<p><b>PROJECT WORKERS TRAINING:</b></p> <ul style="list-style-type: none"> <li>✓ Training will be provided to workers in hygiene, health and safety, sexual transmitted diseases, gender based violence/exploitation and sexual abuse.</li> </ul> <p>More awareness campaigns to be delivered through different media (local radio stations, wall charts, poems, social media, etc.) to project workers, students and local community on technics that can be used in prevention of respiratory disease especially COVID-19; those include proper handwashing, avoiding unnecessary handshaking, practicing</p>	<p>November 2019 prior to commencement of construction, with regular site training sessions.</p> <p>Through Project implementation</p>	<p>MINEDUC/SPIU, Contractors, Districts.</p> <p>Training costs to be included in the capacity building budget.</p> <p>MINEDUC, Districts,</p>	<p>During the Project implementation</p> <p>Through Project implementation</p>

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	social distancing, coughing on the elbow, etc.			
2.6	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project (See the ESIA findings)</i>			
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>				
3.1	<p><b>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:</b></p> <p>The following measures will be put in place to ensure effective management of wastes and hazardous materials, including those related to the AF activities;</p> <ul style="list-style-type: none"> <li>✓ Generation of hazardous and non-hazardous waste materials will be avoided or minimized in all possible measures;</li> <li>✓ Where waste generation cannot be avoided, it will be reduced, recovered and reused in a manner that is safe for human health and the environment. Where waste cannot be recovered or reused, it is to be treated, destroyed, or disposed of it in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.</li> <li>✓ The existing national requirements for management of hazardous wastes including national legislation and applicable international conventions, will be abided by.</li> <li>✓ There will be no manufacture, trade and use of chemicals and</li> </ul>	Throughout project implementation.	MINEDUC/SPIU and its implementing partners, Contractors	Throughout the Project implementation

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	<p>hazardous materials subject to international bans, restrictions or phase-outs.</p> <ul style="list-style-type: none"> <li>✓ The release and use of hazardous materials will be minimized and controlled.</li> <li>✓ No exchange of PPEs especially helmets during construction to avoid possible transmission of respiratory disease</li> </ul> <p><b>Resource Efficiency:</b> Feasible measures (financial and technical) for improving efficiency in consumption of energy and water, as well as other resources and material inputs will be put in place.</p> <p>The production, transportation, handling, storage, and use of hazardous materials for the entire cycle of the project will be assessed through the ESIA and/ or the ESMP</p>			
3.2	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project (See the details of ESIA)</i>			

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<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
<p><b>4.1 TRAFFIC AND ROAD SAFETY:</b></p> <ul style="list-style-type: none"> <li>✓ The potential traffic and road safety risks to workers and potentially affected communities throughout the project life-cycle will be identified, evaluated and monitored.</li> <li>✓ The appropriate measures and plans will be identified, developed and implemented to address potential traffic and roads safety risks, including appropriate training to workers on driving and vehicle safety.</li> <li>✓ The regular maintenance of project vehicles will be ensured.</li> </ul>	November 2019 prior to commencement of construction and maintain during the project timeline	MINEDUC/SPIU, Contractors, Districts, Schools	Throughout the Project implementation
<p><b>4.2 COMMUNITY HEALTH AND SAFETY:</b></p> <ul style="list-style-type: none"> <li>✓ The potential risks and impacts of the parent Project and the AF activities to the community and environment will be identified and appropriate mitigation measures will be set in regard to parent Project activities as well as to AF activities.</li> <li>✓ Community Exposure to disease namely water borne diseases, vector borne diseases, communicable diseases and COVID-19</li> </ul>	November 2019 prior to commencement of construction and maintain during the project timeline	MINEDUC/SPIU, Contractors, Districts	Throughout the Project implementation  Throughout

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	<p>will be avoided or mitigated taking into consideration higher sensitivity of vulnerable groups.</p> <ul style="list-style-type: none"> <li>✓ Report any suspicious respiratory transmitted disease and quarantine infected worker and avoid contact with local community</li> <li>✓ Develop, adopt, and implement specific provisions for pandemic health measures such as Covid-19 for local populations in the face of the Project's labor influx, in compliance with the World Bank Group's Environment, Health, and Safety Guidelines (interim notes on fight against COVID-19) and include these measures in the ESMPs to be developed and implemented in a satisfactory manner</li> </ul>	Throughout project implementation	MINEDUC, District	Project implementation
4.3	<p><b>GBV AND SEA RISKS:</b></p> <p>During development and implementation of measures and actions to assess and manage the risks of gender-based violence (<i>GBV</i>) and sexual exploitation and abuse (<i>SEA</i>), much emphasis will be put on the following</p> <ul style="list-style-type: none"> <li>✓ Prevent or mitigate risks of sexual exploitation and abuse that may result from interaction and collaboration between groups of actors</li> <li>✓ Identify and understand the risk to women and other vulnerable populations, of sexual exploitation and abuse;</li> <li>✓ In collaboration with local government and other actors in education, MINEDUC will assess the impact of COVID-19 on</li> </ul>	<p>November 2019 prior to commencement of construction and maintain during the project timeline</p> <p>Quarter 1 of 2021</p>	<p>MINEDUC/SPIU, Contractors, Districts</p> <p>MINEDUC</p>	Throughout the Project implementation

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	<p>child sexual assault, teenage pregnancy, dropout and other GBV cases associated with school suspension and Stay-home orders resulted from COVID-19 pandemic.</p> <ul style="list-style-type: none"> <li>✓ Raise consciousness of boys and girls at increased risk of violence and how to report violence cases during schools' shutdown and stay-at-home orders as results of COVID-19 through use of social media, radio television and mobile SMS communication</li> <li>✓ Organize awareness raising sessions and educate the workers and the community in the project site on issues of GBV/SEA, legal rights, grievance redress mechanism and referral path for victims of GBV and SEA.</li> <li>✓ SEA risks will be monitored continuously through the life of a project. If the risk of SEA is found to be increase during the course of a project, this should trigger concomitant action.</li> <li>✓ Grievance Redress Mechanisms for SEA will be strengthened and integrated to track complaints related to SEA/GBV, including a feedback system for regular and timely feedback on actions taken to respond to complaints.</li> </ul>	<p>During COVID-19 Pandemic</p> <p>Monthly awareness raising campaigns through the stakeholder's engagement forums such as umuganda</p>	<p>MINEDUC, REB,NESA</p> <p>Districts, Sectors and MINEDUC</p>	<p>September 2020</p> <p>Throughout the project implementation</p>
4.4	<p><b>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</b> The Project has designed a dedicated subcomponent 2.3 aimed at addressing GBV/SEA issues under this project. Supporting gender sensitive learning environment for students</p>	Throughout the project	MINEDUC/PIU	Through the project implementation

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4.5	<p><b>EMERGENCY RESPONSE MEASURES:</b></p> <p>Throughout the life cycle of the parent Project as well as the AF, there will be continuous assessment of possible risks to the communities as it relates to emergency incidents such as the uncontrolled release of pollutants and fire, accidents, etc.</p> <p>A procedure to ensure compliance with local laws and international requirements relating to the emergency response approach, hazardous materials management, vehicle and container specifications, training of the drivers, risks associated with the transportation route will be developed.</p> <p>The emergency plans address the following aspects of emergency response and preparedness: COVID-19 pandemic mitigation related to the AF (also reflected in the updated SEP), specific emergency response procedures, communication strategy, trained emergency response teams, emergency contacts and communication systems/protocols, procedures for interaction with local and regional emergency and health authorities, protocols for fire truck, ambulance, and other emergency vehicle services.</p>	November 2019 prior to commencement of construction and maintain during the project timeline	MINEDUC/SPIU, Contractors	Throughout the project implementation
4.6	<p><b>SECURITY PERSONNEL:</b></p> <p>Not applicable to this project</p>	Not applicable to the project	Not applicable	

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4.7	<b>TRAINING FOR THE COMMUNITY:</b> Not applicable	Not applicable	Not applicable	
4.8	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project</i>			
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>				
5.1	<b>LAND ACQUISITION AND RESETTLEMENT:</b> Resettlement Policy Framework (RPF) of the parent Project has been prepared before appraisal to guide project implementation. For additional financing, it will be updated to include information related to additional financing if needed.	May 2019, before parent Project appraisal and June 2022 for AF	MINEDUC/SPIU, Districts	Before the Project appraisal
5.2	<b>RESETTLEMENT PLANS:</b> Develop and implement resettlement plans [RAPs] consistent with the requirements of the [RPF ] and ESS5. All subproject sites will be (for additional classrooms and new schools as well as for additional financing activities) assessed in terms of availability of land for additional classrooms or schools and those with land acquisition requirements, RAPs will be prepared and submitted to the bank for review and clearance before the start of any civil works on such sites.	Before commencement of any civil works at a site with expropriation requirement	MINEDUC/SPIU, Districts	Throughout the Project implementation
5.3	<b>MONITORING AND REPORTING:</b> Ensure that monitoring and reporting on land acquisition and resettlement activities are conducted separately.	Throughout the Project life.	MINEDUC/SPIU, Districts	Throughout the Project implementation

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5.4	<b>GRIEVANCE MECHANISM:</b> Update and implement the arrangements for the grievance mechanism for resettlement if needed (The existing community Grievance Redress Mechanism will be updated and used to handle issues related to resettlement if any)	The existing GRM of the parent Project will be applied on AF as well	MINEDUC/SPIU, Districts, contractors	Throughout the Project implementation
5.5	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project</i>			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>				
<b>6.1</b>	<b>BIODIVERSITY RISKS AND IMPACTS:</b>  Prepare ESMPs including measures to avoid, minimize, compensate potential impacts on endemic and threatened biodiversity and sensitive ecosystems from project activities. These ESMP shall be developed in accordance with the provisions of ESS6 and guidelines set forth in the ESMF, in a manner acceptable to the Association  Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage will be established. Sensitive ecosystems such as legally designated protected areas, forests, biodiversity areas or buffer zones will not be encroached upon.	November 2019 prior to the commencement of parent Project activities as well as AF activities	MINEDUC/SPIU, Contractors, Districts	Throughout Project implementation
<b>6.2</b>	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project</i>			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>				

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<b>7.1</b>	<b>INDIGENOUS PEOPLES PRESENT OR COLLECTIVELY ATTACHED TO PROJECT AREA:</b> Not applicable	Not applicable	Not applicable	
<b>7.2</b>	<b>INDIGENOUS PEOPLES PLAN:</b> Not applicable	Not applicable	Not applicable	
<b>7.3</b>	<b>GRIEVANCE MECHANISM:</b> Not applicable	Not applicable	Not applicable	
<b>7.4</b>	<i>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project See the ESA</i>	Not applicable	Not applicable	
<b>ESS 8: CULTURAL HERITAGE</b>				
<b>8.1</b>	<b>CHANCE FINDS:</b>  In collaboration with Rwanda Development Board (RDB) and MINISPOC, develop chance finds procedure in case valuable artefacts or culturally valuable materials are found. Such procedure will be included in all contracts relating to the implementation of the project.  Ensure relevant workers are trained in the requirements of the procedure prior to ground disturbance.	November 2019 prior to the commencement and maintain during Project implementation	MINEDUC/SPIU, Contractors, RDB, MINISPOC, Districts	Through the Project implementation
<b>8.2</b>	<b>CULTURAL HERITAGE:</b>  <b>Identify measures to address risks and impacts on cultural heritage.</b>  Through the environmental and social assessment, determine	Before construction on any site	MINEDUC/SPIU, Contractors, Districts	Throughout the Project implementation

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	<p>appropriate measures to address risks and impacts on cultural heritage, including:</p> <ul style="list-style-type: none"> <li>- retain competent professionals to assist in the identification and protection of cultural heritage;</li> <li>- ensure that internationally recognized practices for field-based study, documentation and protection of cultural heritage are implemented, including by contractors and other third parties;</li> <li>- Consult with stakeholders, and encourage them to participate in management of cultural heritage likely to be affected by the project and explore avoidance and mitigation options;</li> <li>- Consult with persons with relevant expertise to determine whether disclosure of information regarding cultural heritage required under the ESSs would compromise or jeopardize the safety or integrity of such cultural heritage.</li> <li>- In collaboration with relevant stakeholders, implement any agreed protective or recovery measures such as identified in the ESIA or other specific studies.</li> </ul>			
<b>8.3</b>	<b>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project</b>			
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>				
<b>9.1</b>	<p><b>ESMS:</b></p> <p>Not applicable to the project</p>	Not applicable	Not applicable	Not applicable
<b>9.2</b>	<p><b>FI ORGANIZATIONAL CAPACITY:</b></p> <p>Not applicable to Rwanda's case.</p>	Not applicable	Not applicable	Not applicable

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<b>9.3</b>	<b>SENIOR MANAGEMENT REPRESENTATIVE: Not applicable</b>	Not applicable	Not applicable	
<b>9.4</b>	<b>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project (see ESIA)</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>				
<b>10.1</b>	<p><b>Stakeholder Engagement Plan (SEP) PREPARATION:</b></p> <p>Implement the updated Stakeholder Engagement Plan (SEP), comprising the AF activities, describing the timing and methods of engagement with the project-affected communities and other stakeholders throughout the life-cycle of the project.</p> <p>The updated SEP describes the range of information to be provided to and sought from stakeholders. Main characteristics and interests of stakeholders, as well as different levels of engagement and appropriate consultation will be taken into account.</p> <p>The updated SEP also includes and describes the grievance mechanism required.</p>	SEP already updated	MINEDUC/SPIU,	Throughout the project implementation
<b>10.2</b>	<p><b>SEP IMPLEMENTATION:</b></p> <ul style="list-style-type: none"> <li>✓ Ensure effective information dissemination and consultations on emergency preparedness and response,</li> <li>✓ Establish appropriate channels of communication to maintain ongoing engagement and communicating additional</li> </ul>	Throughout Project implementation	MINEDUC/SPIU, Contractors, Districts	Throughout the Project implementation

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	<p>information that may arise at key stages in the project cycle prior to start-up of operations, and any specific issues identified as of concern to stakeholders.</p> <ul style="list-style-type: none"> <li>✓ Inform stakeholders about any material changes to the project that result in additional risks and impacts of concern, specifying how those risks and impacts are being addressed and disclose an update.</li> </ul>			
<b>10.3</b>	<p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>The grievance mechanism will be updated to reflect the AF activities and will ensure reception and timely response to any complaints made about the project (including those from members of the communities, local businesses and other stakeholders) and will be the basis for developing appropriate mitigation strategies.</p> <p>The grievance redress mechanism to be updated will include the following elements:</p> <p>(a) Modalities by which stakeholders can submit their complaints, including, but not limited to, submissions in person, by phone, text</p>	Updated GRM, May 2022	MINEDUC/SPIU, Contractors, Districts	Throughout the Project implementation

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<p>message, letters or e-mail;</p> <p>(b) A log where complaints are registered in writing, maintained as a database;</p> <p>(c) Publicly advertised service standards outlining the length of time stakeholders can expect to wait for acknowledgement, response and resolution of their complaints;</p> <p>(d) Transparency about the grievance procedure, governing structure and decision makers;</p> <p>(e) An option for moving to mediation in cases where complainants are not satisfied with the proposed resolution and as appropriate; and</p> <p>(f) An appeal process (including the national judiciary) to which unsatisfied complainants may be referred when an agreed resolution by other means has not been reached.</p> <p>(g) The Project-affected communities will be informed about the grievance process in the course of its community engagement or stakeholders' engagement activities, and will make publicly available a record documenting the responses to all grievances received.</p> <p>(h) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected communities.</p>			

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<b>10.4</b>	<b>Add other measures and actions that have been agreed, as per the specific risks and impacts of the Project (see ESIA)</b>			

**Capacity Support**

<b>Specify Training to be provided</b>	<b>Specify Targeted Groups and Timeframe for Delivery</b>	<b>Specify Training Completed</b>
Use of Personal Protective Equipment (PPE)	All workers and project staff Continuous	
Emergency Preparedness and Response, including COVID-19 pandemic mitigation in relation to the AF activities.	Site Engineers and Project Manager A month	
Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	All workers and project staff Continuous throughout the project timeline	
Environmental Awareness	All workers and project staff Continuous throughout the project timeline	
Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)	Idem	
Sexually Transmitted Diseases (STDs) and other communicable diseases	Idem	
Environment and social monitoring and reporting	Environment safeguard specialist and Social safeguards specialist	