



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

..... April 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the **Republic of Ghana** (the **"Recipient"**) will implement the Secondary Education Transformation for Access, Relevance and Results, for Jobs (STARR-J) Project (the **"Project"**), through the Ministry of Education (MoE) as the implementing agency, 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 (Credit No. XXXX-GH) (the **"Agreement"**). The International Development Association (the **"Association"**), has agreed to provide financing for the Project, as set out in the Agreement.
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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. 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 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 Recipient's Representative specified in the Agreement or the Chief Director of the Ministry of Education. The Recipient shall promptly disclose the updated ESCP.

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	<p>ORGANIZATIONAL STRUCTURE</p> <p>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, all with experience, qualification and terms of reference acceptable to the Association.</p>	<p>Establish and maintain a Secretariat for the PTT, and hire one Environmental Specialist, one Social Specialist, and one GBV/SEA/SH Specialist prior to Project Effective Date and thereafter maintain these positions throughout Project implementation.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ol style="list-style-type: none"> 1. 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 2. 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 3. Training for Project workers including contractor workers on their obligations including labor, code of conduct and GBV/SEA/SH 	<ol style="list-style-type: none"> 1. Prior to commencement of civil works with refresher training/orientation in the respective districts or as may be determined during Project implementation. 2. Prior to commencement of activities by the respective supervision and contractor firms with refresher training/orientation as may be determined during Project implementation. 3. Prior to commencement of duty by the respective workers with refresher training/orientation as may be determined during project implementation. 	<p><i>Project Technical Team (PTT) of MOE</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING		
<p>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:</p> <ul style="list-style-type: none"> • Status of implementation of the ESCP • 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. 	<p>Submit quarterly reports to the Association throughout Project implementation, commencing 60 days after the Project Effective Date. Submit each report to the Association no later than five (5) days after the end of each reporting period.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<p>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 Association.</p>	<p>Submit the monthly reports to the Association upon request or as annexes to the reports to be submitted under action C above throughout the Project's implementation period starting from the Effective Date.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<p>E INCIDENTS AND ACCIDENTS 1. Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including 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.</p>	<p>1. Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		4. Prior to commencement of the respective Project activity and thereafter implement throughout Project implementation	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>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.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request</p>	<i>Project Technical Team (PTT) of MOE</i>
1.3	<p>TECHNICAL ASSISTANCE</p> <p>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.</p>	Throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>1. Prepare CERC activation E&S management procedures as an annex to the Project ESMF under 1.1 (1) above.</p> <p>2. Implement the E&S provisions of the CERC Manual and the CERC ESMF annex in accordance with the ESSs and the provisions of this ESCP.</p>	<p>1. Preparation of CERC ESMF annex during project implementation, and if applicable, other E&S documents, as relevant in form and substance acceptable to the Association is a withdrawal condition under the Agreement.</p> <p>2. In accordance with the timeframe specified in the CERC manual and any assessments and plans required therein</p>	<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project</p>	<p>Prepare the LMP no later than three (3) months after Project Effective Date, and thereafter implement the LMP throughout Project implementation, but prior to commencing any civil works.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Finalize and implement the draft OHS Management Plan as part of the ESMF in 1.1 above, to assess and manage the OHS risks and impacts of the Project.</p> <p>AND</p> <p>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 site-specific Environmental and Social Management Plans (ESMPs).</p>	<p>Finalize the OHS Management Plan as part of draft ESMF within the same timeline as ESMF under 1.1 above, and thereafter implement the plan throughout Project implementation.</p> <p>Prior to commencement of civil works and thereafter implement the plan throughout project implementation period.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p> <p>Contractors</p>
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.</p>	<p>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p><i>Project Technical Team (PTT) of MOE and Contractors</i></p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>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.</p> <p>And</p>	<p>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.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p> <p>Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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 site-specific Environmental and Social Management Plan (ESMP).	Prior to commencement of civil works and thereafter implement the plan throughout project implementation period.	
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>Ensure all service providers have environmental and social requirements written into their contracts, including the safe handling, storage, and disposal of hazardous substances.</p>	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	<p>TRAFFIC AND ROAD SAFETY</p> <p>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.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	<i>Project Technical Team (PTT) of MOE and Contractors</i>
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>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.</p>	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
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a GBV/SEA/SH Action Plan to assess and manage the risks of GBV, SEA and SH.</p>	<p>Prepare and disclose the GBV/SEA/SH Action Plan no later than three (3) months after the Project Effective Date, and thereafter implement the GBV/SEA/SH Action Plan throughout Project implementation, but prior to commencing any civil works.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</p>			
5.1	<p>RESETTLEMENT FRAMEWORK</p> <p>1. Finalize and implement the draft 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.</p> <p>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.</p>	<p>1. Finalize the draft RPF and disclose prior to project Negotiations, and thereafter implement the RPF throughout Project implementation.</p> <p>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.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>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.</p> <p>2. Prepare site-specific Biodiversity Management Plans (BMPs) where relevant, or ESMPs and include biodiversity measures as needed; include ESS6 requirements in bidding documents; finalize BMPs or ESMPs before mobilization; implement and monitor during construction; restore post-construction.</p>	<p>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 biodiversity measures or BMPs throughout Project implementation.</p>	<p><i>Project Technical Team (PTT) of MOE</i></p>

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.		
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 Finalize and implement the draft chance finds procedures, as part of the draft ESMF of the Project.	Finalize description of the draft chance find procedures in the draft ESMF. Implement the procedures throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not applicable.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which includes 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.	The SEP which was finalized and disclosed on March 30, 2026, will be implemented 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.	Establish the grievance mechanism not later than three (3) months after the Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	<i>Project Technical Team (PTT) of MOE</i>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>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.</p>		
<p>INDICATORS FOR IMPLEMENTATION READINESS</p>		
<p>The following actions are indicators for implementation readiness:</p> <p>A – Organizational Structure</p> <ul style="list-style-type: none"> 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). <p>B – Capacity Building Measures</p> <ul style="list-style-type: none"> Initial ESF, OHS, GBV/SEA/SH, and GRM training completed for PTT and designated regional/district focal points. <p>1.1 – Environmental and Social Management Framework (ESMF)</p> <ul style="list-style-type: none"> ESMF prepared, cleared, disclosed, including screening procedures, exclusion list, OHS, chance finds, and CERC annex. <p>5.1 – Resettlement Policy Framework (RPF)</p> <ul style="list-style-type: none"> RPF prepared, cleared, and disclosed prior to negotiations. <p>2.1 – Labor Management Procedures (LMP)</p> <ul style="list-style-type: none"> LMP prepared and disclosed prior to effectiveness, including worker GRM and child labor provisions. <p>4.3 – GBV/SEA/SH Action Plan</p> <ul style="list-style-type: none"> GBV/SEA/SH Action Plan prepared, and initial systems operationalized prior to commencement of civil works. <p>10.1 – Stakeholder Engagement Plan (SEP)</p> <ul style="list-style-type: none"> SEP prepared, cleared, and disclosed prior to Appraisal. <p>10.2 – Project Grievance Mechanism</p> <ul style="list-style-type: none"> Project and sector-wide GRM established, publicized, and functional, including confidential GBV/SEA/SH handling. 		