



**KINGDOM OF LESOTHO**

**MINISTRY OF EDUCATION AND TRAINING (MoET)**

**&**

**MINISTRY OF SOCIAL DEVELOPMENT (MoSD)**

**BASIC EDUCATION STRENGTHENING PROJECT (BESP)**

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**Volume 3: The ESCP**

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

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Prepared for:

Ministry of Education and Training  
Maseru  
Lesotho

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**Environmental and Social Commitment Plan (ESCP)**

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# OTHER REPORTS IN THIS SERIES

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The Lesotho Basic Education Strengthening Project (BESP) Environmental and Social Commitment Plan (ESCP) forms part of a series which is intended to provide complete documentation for the requirements of a holistic Environmental and Social Safeguards management system for the project. This Report contains the findings of a study conducted for the Education sector of the Kingdom of Lesotho and the instrument has been developed based on the local conditions and findings.

The following documents form the series:

1. **Volume 1: The ESMF  
BASIC EDUCATION STRENGTHENING PROJECT (BESP)  
ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK**
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BASIC EDUCATION STRENGTHENING PROJECT (BESP)  
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BASIC EDUCATION STRENGTHENING PROJECT (BESP)  
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

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The Minister of Education and Training  
Attention: The Secretary of Education and Training  
Ministry of Education and Training  
Maseru  
Lesotho

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Lesotho, (KoL) through its Ministry of Education and Training (MoET) and its Ministry of Social Development (MoSD), will implement the Basic Education Strengthening Project (the Project). The International Development Association (hereinafter, the Association) has agreed to provide financing for the Project.
2. The Kingdom of Lesotho will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Kingdom of Lesotho will also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as Environmental and Social Management Framework, including the Action Plan preventing Gender-Based Violence, Labor Management Procedures, and Waste Management Plan (collectively, the ESMF), Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Kingdom of Lesotho is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Kingdom of Lesotho, as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Kingdom of Lesotho, this 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 Kingdom of Lesotho, will agree to the changes with the Association 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 Association and the Kingdom of Lesotho. The Kingdom of Lesotho will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Kingdom of Lesotho, shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts and gender-based violence.

**Stakeholder Engagement Plan (SEP)**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>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 implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Monthly Reporting throughout project implementation</p> <p>Semi-annually as part of Project progress reports.</p>	<p>MoET and MoSD PFU,  E&amp;S specialist  Consultant</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></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, students, education establishment staff, local communities, the public or workers, including risks based on the environmental and social assessment. Indicative examples: any Project-related accidents or fatalities, labour unrest, or Project-related allegations of gender-based violence.</p> <p>Provide sufficient detail regarding 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 supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Bank within 48 hours after learning of the incident or accident with the submission of any required subsequent report within a timeframe acceptable to the Association, as required <i>in line with the IDA’s Environment and Social Incidence Response Toolkit (ESIRT)</i>.</p>	<p>MoET and MoSD PFU,  E&amp;S specialist  Consultant</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

## Stakeholder Engagement Plan (SEP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>KoL will maintain the organisational structure of the existing LEQEP Project Facilitation Unit (PFU), through which the proposed BEST Project will be implemented. The organizational structure must have qualified staff and resources to support the management of Environmental and Social (E&amp;S) risks including an Environmental and Social Specialist (ESS) responsible for the day-to-day implementation of the ESMF, Labor Management Procedures, Waste Management Plan, GBV Action Plan, and Stakeholder Engagement Plan. Currently, the PFU does not have a dedicated ESS and must engage one as soon as possible.</p>	<p>The Organizational structure should be fully established within 90 days after Project effectiveness.</p> <p>The organizational structure, including the specialists, should be maintained throughout Project implementation.</p>	MoET and MoSD
1.1.1	<p>The KoL will ensure, by means of the PFU Project Coordinator, that the ESS conducts his/her environmental and social management tasks for the Project in terms of: ensuring preparation and dissemination of the ESMF and related tools and the SEP to key stakeholders; screening activities; ensure incorporation of the environmental and social aspects into tender documents and monitoring effective implementation of environmental and social management instruments.</p>	<p>From project inception and to be maintained throughout the project implementation.</p>	
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>KoL will develop, disclose and implement the following tools and instruments to identify and assess the environmental and social risks and impacts of the Project and appropriate mitigation measures, in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> <li>• an Environmental and Social Management Framework (ESMF), which includes GBV Action Plan, Waste Management Plan, and Labor Management Procedures,.</li> <li>• a Stakeholders Engagement Plan (SEP) incorporating the Grievance Redress Mechanism (GRM) in place, and</li> <li>• an Environmental and social commitment plan (escp)</li> </ul>	<p>Prepare and disclose the ESMF, SEP and ESCP before Appraisal.</p> <p>Implement the ESMF, SEP and ESCP throughout Project implementation.</p>	MoET and MoSD

## Stakeholder Engagement Plan (SEP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b>                      KoL shall ensure that terms of reference for studies, advisory services and the outputs of any technical assistance provided for the proposed project, including, but not limited to, the preparation of environmental and social instruments for the Project, are prepared and/or delivered in a manner acceptable to IDA and duly incorporate and take into consideration the requirements of the Environmental and Social Standards or the Performance Standards, as appropriate.</p> <p>The PFU will screen any proposed subprojects in accordance with the ESMF prepared for the Project, and, thereafter, prepare and implement the Waste Management Plan (for sub-component 1.3)), as required and if needed, in a manner acceptable to the Bank/Association.</p>	<p>Prepare and disclose the WMP as part of the ESMF before Appraisal.                      Implement the WMP throughout Project implementation.</p>	MoET and MoSD
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b>                      Not relevant</p>		
1.5	<p><b>MANAGEMENT OF COMMUNITY LABOR</b>                      Not relevant</p>		
1.6	<p><b>PERMIT, CONSENTS AND AUTHORIZATIONS:</b>                      Obtain, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities, pursuant to applicable national laws.                      The following permit applies,                      Basel Permit for the export, import or transit of hazardous waste.                      Relevant Regulation: Basel Convention. Issuing Authority: Department of Environment (DoE).</p>	<p>Obtain permit prior to carrying out any relevant Project activities.</p>	MoET
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b>                      Develop, disclose, and implement Labor Management Procedures (LMP) as part of the ESMF for the Project.</p>	<p>To be developed and disclosed before Appraisal.                       To be implemented throughout project implementation.</p>	MoET and MoSD
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>                      Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>To be established before Appraisal. To be implemented throughout project implementation.</p>	MoET and MoSD

## Stakeholder Engagement Plan (SEP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Develop and implement occupational, health and safety (OHS) measures, including emergency preparedness and response measures, consistent with the ESMF and World Bank Group Environmental Health and Safety Guidelines, which shall be set out in the LMP.</p>	To be developed before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Resource efficiency and pollution prevention and management measures will be covered under the Waste Management Plan to be prepared as part of the ESMF (see action 1.3 above).  PFU will ensure that the e-waste Management is implemented in every school concerned</p>	<p>WMP to be developed and disclosed before Appraisal.</p> <p>WMP to be implemented throughout project implementation.</p>	<p>MoET and MoSD PFU,  E&amp;S specialist  Consultant</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b> Not relevant to the Project</p>		MoET and MoSD
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b> Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities and include these measures in the ESMF, in a manner acceptable to the Bank.  The project ESMF will include mitigation measures to address community health and safety risks and impacts.</p>	<p>To be prepared before Appraisal.</p> <p>To be implemented throughout project implementation.</p>	<p>MoET and MoSD PFU,  E&amp;S specialist  Consultant</p>

**Stakeholder Engagement Plan (SEP)**

4.3	<p><b>GBV AND SEA RISKS:</b>          Prepare and implement measures to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) and include these measures in the ESMF, all proportionate to the risks posed by project activities.</p> <p>Develop SEA/GBV action plan which will include:</p> <ul style="list-style-type: none"> <li>• Measures and actions to assess and manage the risks of HIV/AIDS, gender-based violence (GBV) and sexual exploitation and abuse (SEA) as part of LMP and ESMF.</li> <li>• Awareness raising on grievance/feedback processes for reporting SEA a&amp; GBV cases.</li> <li>• Engage a qualified institution to conduct community and workers’ training and awareness on HIV/AIDS, GBV &amp; SEA.</li> </ul>	<p>To be prepared before Appraisal.</p> <p>To be implemented throughout project implementation.</p>	<p>MoET and MoSD          PFU,          E&amp;S specialist          Consultant</p>
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**ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT**

	<p>Not Relevant          There are no actions under the proposed project that will result in resettlements, restrictions on land use and involuntary resettlement, therefore there are no mitigation measures to be undertaken under this ESS 5</p>		
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**ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES**

	<p>Not Relevant  <b>BIODIVERSITY RISKS AND IMPACTS:</b>          There are no actions under the proposed project that will affect Biodiversity conservation and sustainable management of living natural resources, therefore there are no mitigation measures to be undertaken under ESS6.</p>		
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**ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES**

### Stakeholder Engagement Plan (SEP)

	Not Relevant There are no actions under the proposed project that will affect Indigenous Peoples or Sub-Saharan Historically underserved Traditional Local Communities, therefore there are no mitigation measures to be undertaken under ESS7.		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	Not Relevant There are no actions under the proposed project that will affect Cultural Heritage, therefore there are no mitigation measures to be undertaken under ESS8.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not Relevant There are no actions under the proposed project that are related to Financial Intermediaries, therefore there are no mitigation measures to be undertaken under ESS9.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> The Stakeholder Engagement Plan (SEP) has been prepared and disclosed. <i>The Draft SEP shall be consulted upon, adopted, disclosed and updated when necessary.</i> The SEP will be implemented hereinafter to continue stakeholder engagement and consultation.	To be implemented throughout project implementation.	MoET and MoSD
10.2	<b>PROJECT GRIEVANCE MECHANISM:</b> Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.	GRM to be established before appraisal and maintained throughout project implementation.	MoET and MoSD
10.3	<b>SEP Implementation:</b> KoL will ensure disclosure and implementation of draft SEP. The SEP may be amended and updated as needed during the PPA implementation.	During project implementation.	PFU, E&S specialist
<b>CAPACITY SUPPORT (TRAINING)</b>			

**Stakeholder Engagement Plan (SEP)**

<p>CS1</p>	<p>The KoL will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts of the BESP. This ESCP proposes a preliminary training plan covering the following topics.</p> <p>Training for PIU project staff and consultants:</p> <ul style="list-style-type: none"> <li>- ESF Requirements</li> <li>- Roles and responsibilities for environmental and social issues</li> <li>- Occupational health and safety (including COVID-19 recommendation)</li> <li>- Labour requirements</li> <li>- Emergency prevention and preparedness and response arrangements to emergency situations</li> <li>- Managing GBV/SEA risks</li> <li>- Maintaining GRM and keeping GRM log</li> <li>- Waste Management</li> </ul>	<p>Training for PIU and project staff delivered within 90 days following project effectiveness.</p> <p>Training for PFU consultants Repeated as necessary throughout project.</p> <p>This plan will be adapted to meet needs during Project implementation..</p>	<p>MoET and MoSD</p>
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