

West African Institute for Financial and Economic Management (WAIFEM)

DMF III – Implementing Partners-2025, P508220

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

Appraisal Version

February 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The West African Institute for Financial and Economic Management (hereinafter, the “Recipient” or “WAIFEM”) will implement DMF III Implementing Partners-2024 (P508220) Project (the Project) as set out in the Grant Agreement (the Agreement). The International Bank for Reconstruction and Development and the International Development Association (hereinafter collectively, the Bank or the World Bank), acting as the administrator of the DMF III Multi-Donor Trust Fund 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 Bank. 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 Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. 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 Bank 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 Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient’s Representative specified in the Agreement. 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		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support the management of Environmental and Social (E&S) risks, including potential stakeholder and labor risks. Given that this is a low-risk project, there will be no separate hiring of staff specifically for E&S risk management. Instead, responsibilities for implementing stakeholder engagement, labor management and grievance redress aspects will be assigned to existing WAIFEM staff who possess sufficient training and qualifications.</p>	Assignment of a qualified staff no later than sixty (60) days from the Agreement Effective Date, and thereafter maintain this assignment throughout Project implementation.	WAIFEM
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>WAIFEM will conduct training for its staff on stakeholder engagement, labor management. Sexual Exploitation and Abuse/ Sexual Harassment (SEA)/SH) and the grievance redress mechanism per the requirements specified under the ESCP.</p>	No later than ninety (90) days from the agreement Effective Date.	WAIFEM
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the ESCP. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • Number and status of resolution of incidents and accidents reported under action D below. 	Submit Semi-annual reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than thirty (30) days after the end of each reporting period.	WAIFEM
D	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating 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,</p>	Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.	WAIFEM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>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 sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Provide review report and Corrective Action Plan to the Bank] no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>The Project activities will not involve any physical activities that could lead to environmental or social impacts. Therefore, a standalone Environmental and Social Assessment instrument is not required during the implementation phase. However, adherence to applicable Environmental and Social Framework (ESF) of the World Bank, particularly ESS 1, 2, and 10, will be assessed through periodic monitoring, and reported in the semiannual Report in a manner acceptable to the Bank.</p>	<p>Periodic monitoring of applicable standards implementation and reporting in the semiannual Project Report throughout Project implementation.</p>	WAIFEM
1.2	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	WAIFEM
1.3	<p>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Ensure that the E&S risks and impacts of the Project are managed in accordance with this ESCP and the WAIFEM E&S Framework. WAIFEM will implement their respective activities in accordance with the policies and procedures that govern WAIFEM staff and WAIFEM direct contractors. The application of these policies and procedures shall satisfy the relevant aspects of ESS2, including a grievance redress mechanism. WAIFEM will ensure that a code of conduct and provisions on GBV are included in contracts and that there is a process to ensure enforcement. WAIFEM will follow the relevant laws and policies of the selected countries regarding labor, occupational health and safety, during missions and workshops. Furthermore, the ESCP sets out relevant additional measures to manage the E&S risks of the project to ensure alignment with the ESF.</p>	<p>Throughout Project implementation.</p>	WAIFEM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Ensure that the relevant aspects of ESS2 apply to the Project workers, including, inter alia, measures to ensure their health and safety, to address Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) risks, and grievance arrangements for Project workers.</p> <p>The Project will implement technical assistance (TA) and training activities in accordance with ESS2, the WAIFEM relevant policies and procedures linked to labor and working conditions, and the labor-related policies and procedures of beneficiary countries. Relevant labor management policies and procedures (WAIFEM Environmental and Social Policy, Grievance Procedure, Sexual harassment Policy, and Whistleblower Policy and Procedures) will be applied during the preparation and implementation of the activities, including but not limited to the following:</p> <ul style="list-style-type: none"> • Diversity, Inclusion and Non-Discrimination • Employee Welfare (fair compensation and benefits) • Whistleblower Policy and Procedures • Grievance Policies and Procedures • Sexual Harassment Policy • Health and Safety Policies • Anti-harassment policy <p>For SEA and SH risks at the workplace, the Project will:</p> <ol style="list-style-type: none"> i) hold training to raise awareness among WAIFEM staff on the risks and the policy requirements. ii) maintain an accountability and response framework to address any incidents of SEA/SH; and iii) address any incidents of SEA/SH through WAIFEM’s assigned staff. 	Implement the policies and procedures throughout Project implementation	WAIFEM
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>WAIFEM will use its existing grievance redress policy and procedures, to receive and facilitate resolution of any possible concern and grievances from staff members engaged in the project. The Grievance Redress Mechanism (GRM) will be equipped to respond to a diversity of claims including SEA/SH. Labor-related grievances will be handled through this mechanism.</p>	Established within thirty (30) days of the Effective Date and maintained throughout Project implementation.	WAIFEM
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT – Not Relevant			
ESS 4: COMMUNITY HEALTH AND SAFETY – Not Relevant			
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT – Not Relevant			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES – Not Relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES – Not Relevant		
ESS 8: CULTURAL HERITAGE – Not Relevant		
ESS 9: FINANCIAL INTERMEDIARIES – Not Relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
<p>10.1 STAKEHOLDER ENGAGEMENT PLAN</p> <p>Incorporate stakeholder engagement and information disclosure in a manner consistent with ESS10. Consultations will follow the requirements of ESS 10, namely:</p> <ol style="list-style-type: none"> 1. WAIFEM will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. 2. WAIFEM will provide stakeholders with timely, relevant, understandable and accessible information about the environmental and social risks and impacts of the Project, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. 3. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting back to stakeholders. 4. WAIFEM will document and report the stakeholder engagement activities under the Project regular reports. It will maintain, and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not and post-training satisfaction surveys feedback. <p>Access to training will be conducted through fair and open processes in a socially inclusive manner that provides equal opportunity for all.</p>	<p>Throughout Project implementation.</p>	<p>WAIFEM</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>10.2 PROJECT GRIEVANCE MECHANISM</p> <p>In addition to WAIFEM’s Grievance Redress Mechanism (GRM) policies, a project specific GRM will be set up to make sure that any potential complaints are addressed. This GRM will 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>WAIFEM staff will be assigned with the responsibility in managing the resolution of grievances. WAIFEM will inform the project-affected parties about the grievance process during its community engagement activities and will make publicly available a record documenting the responses to all grievances received.</p> <p>Handling of grievances will be done in a culturally appropriate and discreet manner, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.</p> <p>The grievance mechanism will include the following:</p> <ul style="list-style-type: none"> • Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site. • A log where grievances are registered in writing, classified and maintained as a database. • Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances. • Transparency about the grievance procedure, governing structure and decision makers. • An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved. • The Project will maintain the GRM users’ identity as confidential and accept anonymous complaints. • All grievances will be deliberated and addressed in a transparent and timely fashion. The complainant will be informed of the resolution response. • Maintain an updated list of SEA/SH service providers, which can be used to refer potential survivors of SEA/SH-related events. <p>The above GRM will be summarized in a separate document. Following the Bank’s clearance, this document will be uploaded and disclosed publicly on WAIFEM’s website.</p>	<p>Establish the grievance mechanism no later than thirty (30) days after the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>WAIFEM</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
INDICATORS FOR IMPLEMENTATION READINESS		
<p>The following actions are indicators for implementation readiness:</p> <p>A: Establish and maintain an organizational structure with qualified staff and resources to support the management of Environmental and Social (E&S) risks, including potential stakeholder and labor risks.</p> <p>10.2: Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project.</p>		