

**Islamic Republic of Pakistan  
Province of Punjab**

**Getting Results: Access and Delivery of  
Quality Education Services in Punjab System  
Transformation in Punjab Project (GRADES-  
STP) (P508940):**

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

**For Approval**

**August 26<sup>th</sup> , 2025**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Islamic Republic of Pakistan (the Recipient) through PIE will implement the **Getting Results: Access and Delivery of Quality Education Services and System Transformation in Punjab Project (GRADES-STP)** (the Project), with the involvement of Province of Punjab (Project Implementing Entity) as set out in the Grant and Project Agreements (the Agreements). The International Bank for Reconstruction and Development/International Development Association (the Bank), acting as Grant Agent of the Global Partnership for Education Trust Fund, has agreed to provide the financing for the Project, as set out in the Agreements.
2. The Recipient through PIE 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 Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient through PIE shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring, and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESS, and 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 Agreements, 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, and through the Project Implementing Entity agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's and/or the Project Implementing Entity's Representatives specified in the Agreements. 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
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain an organizational structure at Project Management Unit-GRADES at the School Education Department with qualified staff and resources to support management of E&amp;S risks with the following specified positions:</p> <ul style="list-style-type: none"> <li>• Environmental Specialist</li> <li>• Social Development Specialist</li> <li>• Gender Specialist</li> </ul> <p>Engage third party monitoring firm to review the compliance status of project activities with the World Bank's Environment and Social Standards (ESSs), the EHSs, other relevant Good International Industry Practice (GIIP) and national regulations, in a manner acceptable to the Bank.</p>	<p>No later than 6 months after project effectiveness and thereafter maintain the PMU and these positions throughout Project implementation</p> <p>Third Party Monitoring firm to be hired before start of civil works and thereafter maintained throughout Project implementation</p>	SED

B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the following capacity building measures:</p> <p>PMU staff and contractors in:</p> <ul style="list-style-type: none"> <li>• ESMF and ESMP Implementation</li> <li>• Occupational Health and Safety</li> <li>• Monitoring and Reporting</li> <li>• GBV &amp; Child Protection</li> <li>• Disability Inclusion</li> <li>• Waste Management</li> <li>• Community Health &amp; Safety</li> </ul> <p>Project workers training may be required in:</p> <ul style="list-style-type: none"> <li>• ESMP Implementation</li> <li>• Labor Management Procedures</li> <li>• Occupational Health and Safety</li> <li>• Emergency Response Preparedness</li> <li>• Grievance Redress Mechanisms</li> <li>• Code of Conduct</li> </ul>	<p>Prior to initiation of civil works and throughout the project implementation (where required) periodically.</p>	<p>PMU</p>
<p><b>MONITORING AND REPORTING</b></p>			

C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>- status of preparation and implementation of E&amp;S documents required under the ESCP</li> <li>- Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan</li> <li>- Complaints submitted to the grievance mechanisms, the grievance log, and progress made in resolving them.</li> <li>- E&amp;S performance of contractors as reported through monthly contractors' reports</li> <li>- Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>	<p>Submit biannual reports to the Bank throughout the Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than two weeks after the end of each reporting period (by July 14 and December 14).</p>	<p>PMU</p>
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D	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require contractors to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	<p>Submit the monthly reports to the Bank as annexes to the reports to be submitted under action C above. Submit each report to the PMU throughout the Project implementation, within one weeks after completion of each month of the year (e.g. by January 7, February 7, March 7).</p>	PMU, Contractors
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank 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;; 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. 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>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	PMU, Contractors
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND/OR PLANS</b>	1. Implement the ESMF	PMU

	<ol style="list-style-type: none"> <li>1. Implement the ESMF already prepared for GRADES- P</li> <li>2. Prepare and implement the Project Operations Manual (POM), which shall include an environmental &amp; social screening checklist for the Non-Formal Educational Institutes (NFEIs) under sub-component 1.2 of the project, voluntary land donation protocol, LMP, OHS management plan, teacher codes of conduct, and any other required E&amp;S guidance .</li> <li>3. Prepare, disclose, adopt, and implement any Environmental and Social Management Plans (ESMPs) for subprojects, as set out in the ESMF. The ESMPs will be made part of the bidding documents for any contractors, as and when required. ESMPs will be prepared by the consulting firm hired by PMU supervised by E&amp;S specialist of PMU.</li> </ol>	<p>throughout Project implementation.</p> <p>2.Integrate E &amp; S guidance into the POM and prepare the POM within three months of project effectiveness and thereafter implement throughout Project implementation</p> <p>3.Prepare and adopt site specific E&amp;S Screenings before launching bidding process for the respective subprojects and prepare and adopt site-specific ESMPs, prior to commencement of civil works.</p> <p>Once finalized, the respective ESMPs shall be implemented throughout the implementation of sub-Project</p>	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors. Thereafter</p>	<p>Prior to the preparation of procurement documents and issuing</p>	PMU

	<p>ensure that the contractors comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors to the Bank.</p> <p>These requirements include, inter alia:</p> <ul style="list-style-type: none"> <li>• Each contractor/bidder will propose an ESHS specialist as the contractor's key personnel at the site.</li> <li>• All contractors/bidders will submit and then implement the code of conduct that will apply to the contractor's employees and subcontractors including on SEA/SH.</li> <li>• All contractors will be required to submit for approval and subsequently implement a Contractor's Environment and Social Management Plan (C-ESMP).</li> <li>• All contractors will be required to comply with the ESHS specifications of their respective contracts.</li> </ul> <p>The contractors/bidders shall submit a Forced &amp; Child Labor Declaration prohibiting the use of child and forced labor for contractors and sub-contractors involved therein project.</p>	<p>bidding documents.</p> <p>Contractors' supervision (on implementation) throughout project implementation. Copies of relevant contracts provided to the Bank upon request</p>	
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Capacity building, training, and any other technical assistance activities under the Project, including, inter alia, surveys, environmental and social assessments, etc. will be carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs.</p>	Throughout Project implementation.	PMU
1.4	<p><b>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</b></p> <p>Incorporate the relevant provisions under Punjab Employees Efficiency, Discipline and Accountability Act 2006 (PEEDA) into the GBV/ SEA/SH and Violence Against Children Action Plan</p>	If required, after the completion of inquiry for any grievances registered or observation made.	PMU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES:</b></p> <p>Adopt and Implement the Labor Management Procedure (LMP) for GRADES-P Project that will be extended to cover GRADES-STP. The LMP, which will be prepared as part of the POM, consistent with ESS 2 as well as the National Labor Law.</p>	Same timeline for the adoption and implementation of the POM in action 1.1 above	PMU



2.2	<b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b> Develop and Implement the Occupational, health and safety (OHS) management plan as part of the Labor Management Procedures included in the POM. The OHS measures shall be included in the bidding documents, contractors' contracts and ensure compliance by the Contractors.	Same timeline for the adoption and implementation of the POM in action 1.1 above	PMU
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> A grievance mechanism for Project workers shall be established, maintained, and operated, as described in the LMP and consistent with ESS2. The GRM should also be designed to address labor-related GBV/SEA/SH issues including provision of a referral system.	Grievance Mechanism to be operational prior to engaging any project workers and maintained throughout Project implementation.	PMU-
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>E-WASTE MANAGEMENT PLAN</b> Incorporate e-waste management measures in the ESMP to be prepared under action 1.1 above	Same timeline for the adoption and implementation of the ESMPs in action 1.1 above	PMU
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above	Same timeline for the adoption and implementation of the ESMP in action 1.1 above	PMU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY</b> Prepare and implement Community Health and Safety Plan including the Life and Fire Safety (LFS) and Emergency Preparedness Plan for Non-Formal Educational Institutes and SED schools	Within 90 days of Project Effectiveness and implemented throughout the Project lifecycle	PMU
4.2	<b>TRAFFIC AND ROAD SAFETY</b>  Incorporate site-specific Traffic and Road Safety Plan into the ESMPs and C-ESMPS	Same timeframe as for the adoption and	PMU

		implementation of the ESMPs in action 1.1 above	
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Develop and Implement a GBV/ SEA/SH and Violence Against Children Action Plan, to assess and manage the risks of GBV, SEA SH and child abuse</p> <p>Engage a GBV service provider to ensure the compliance of the project activities with the World Bank's GBV and SEA/SH safeguards and ESF, in a manner acceptable to the Bank</p>	<p>Prepared within 90 days of Project Effectiveness.</p> <p>Thereafter implement the SEA/SH Action Plan throughout Project implementation</p> <p>GBV service provider firm to be hired before implementation of project activities and start of civil works.</p>	PMU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANS:</b></p> <p>Adopt and implement the Resettlement Policy Framework (RPF) developed for the GRADES-Punjab project, as and where required as per the criteria defined in ESF, GRADES-Punjab ESMF and RPF.</p> <p>Include voluntary land use provisions in the application form and legal agreement for the use of site as a Non-Formal Education Institute (NFEI), as specified in the Project Operations Manual (POM).</p> <p>Implement the Voluntary Land Donation (VLD) Protocols, if required for civil works, at SED and SpED school sites, as specified in the Project Operations Manual (POM).</p> <p>Conduct regular monitoring of the land use activities through an Independent Third-Party Monitor and in a manner acceptable to the Bank.</p>	<p>Implement the RPF throughout Project implementation</p> <p>If required, before the start of project activities on the respective subproject</p> <p>Before the finalization of site as NFEI</p> <p>Before the start of civil</p>	PMU

		works	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Not relevant		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>INDIGENOUS PEOPLES FRAMEWORK OR PLAN</b> Not relevant		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS:</b>  Describe and implement chance find procedures as part of ESMPs	Same timeframe for the adoption and implementation of the ESMP	PMU-
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>  Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation	Adopt prior to appraisal and implement the SEP throughout Project implementation.	PMU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b>  Maintain and enhance the established Grievance Redress Mechanism (GRM) 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	Establish the grievance mechanism prior to the commencement of	PMU

	<p>all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Project activities and thereafter maintain and operate the mechanism throughout Project implementation.	
<b>Indicators for implementation readiness</b>			
	<p>The following actions are indicators for implementation readiness:</p> <p>Preparation and adoption of:</p> <ul style="list-style-type: none"> <li>Project Operations Manual including teacher Codes of Conduct, Labor Management Procedures, E&amp;S checklist for NFEIs and OHS management plan</li> </ul> <p>GBV/ SEA/SH and Violence Against Children Action Plan</p>		