



**Ministry of Health**

**Ghana Primary Health Care Investment Program (P173168)**

**Draft**

**ENVIRONMENTAL and SOCIAL  
COMMITMENT PLAN (ESCP)  
FOR THE IPF COMPONENT**

**March 9, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN FOR THE IPF COMPONENT OF THE PROGRAM

1. The Government of Ghana (hereinafter the **Recipient**) *will implement* the Primary Health Care Investment Program (P173168) including the Investment Project Financing (IPF) Component of the PforR Program (hereafter the **Project**), with the involvement of the following Ministry and Agencies: Ministry of Health (MOH), the Ghana Health Service (GHS) and the National Health Insurance Authority (NHIA). The International Development Association (*hereinafter the Association*) *has agreed to provide* financing for the Project.
2. The Recipient 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 Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Labor Management Procedures and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry and agencies 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 Recipient 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 Recipient, 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, Recipient 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 Recipient. The Recipient 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 Recipient 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, labor influx, sexual exploitation and abuse and sexual harassment*.

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 IPF Component of the Program , including but not limited to the stakeholder engagement activities and grievances and functioning of the grievance mechanism(s).</p>	Each six months after the Effective Date and submitted throughout Project implementation.	MOH/GHS
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, the affected communities, the public or workers including situations of fatalities or serious bodily harm and incidents such as fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), accident, any COVID –19 outbreak, communicable diseases and infections in the Project area related to the project. Provide sufficient details 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 Task Team Leader of the Bank within 48 hours after learning of the incident or accident.</p> <p>Upon request from the Association, a detailed report that with root cause analysis and corrective actions would be provided within a timeframe acceptable to the Association.</p>	MOH/GHS/NHIA
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The Ministry of Health and Ghana Health Service have appointed one environmental specialist and one social specialist to lead environment and social risk management and Stakeholder Consultations respectively.</p> <p>The MOH and GHS shall maintain an organizational structure with qualified staff and resources to support management of E&amp;S risks.</p>	The E&S Specialists at the MOH/GHS shall coordinate the environment and social risks management resulting from the TA activities. The organizational structure, including the specialists, shall be maintained throughout Project implementation.	MOH/GHS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Update, adopt, redisclose and implement the Stakeholder Engagement Plan that has been prepared for the Project, and the Labor Management Procedures for the IPF component if major changes occur in the scope of the TA activities during implementation in a manner acceptable to the Association.</p>	Throughout project implementation	MOH/GHS
1.3	<p><b>CONTINGENT EMERGENCY RESPONSE COMPONENT</b></p> <p>a) Ensure that the CERC Manual includes a description of the Environment, Social, Health and Safety (ESHS) assessment and management arrangements, including CERC-ESMF for the implementation of the CERC component, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under the CERC component of the Project, in accordance with the CERC Manual, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) The adoption of the CERC Manual and CERC ESMF in form and substance acceptable to the Association is a withdrawal condition under the legal agreement for the Project. The CERC Manual shall be prepared 3 months after project effectiveness and the CERC ESMF shall be prepared not later than 2 months following CERC activation.</p> <p>b) Adopt any required E&amp;S instrument and include it as part of the respective bidding process before the carrying out of the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</p>	MOH/GHS
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The MOH/GHS shall adopt and implement the occupational health and safety measures outlined in the Labor Management Procedures (LMP) for the Ghana COVID-19 EPRP (P174839) and disclosed on June 2, 2021. The Project will ensure the OHS measures are in line with ESS 2 and national laws that govern labor and working conditions related to the TA activities (administrative-related tasks not requiring civil work) including through, inter alia, implementing adequate occupational health and safety measures and setting out grievance mechanisms for Project workers. Consultant contracts shall reflect appropriate labor and working conditions as per ESS2 and specific measures on COVID-19 prevention, and general health and safety measures.</p> <p>SEA/SH prevention measures including requirements for consultants to adhere to the GHS Code of Conduct and Disciplinary Procedures shall be applied to consultants working on any aspect of the TA activities.</p>	Throughout Project implementation	MOH/GHS
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
	Not currently relevant	Not relevant	Not relevant
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
	Not currently relevant	Not relevant	Not relevant
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
	Not currently relevant based on the scope of the TA activities	Not relevant	Not relevant
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	Not currently relevant	Not relevant	Not relevant
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Not currently relevant	Not relevant	Not relevant
<b>ESS 8: CULTURAL HERITAGE</b>			
	Not currently relevant	Not relevant	Not relevant
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not currently relevant	Not relevant	Not relevant
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			

10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Update, adopt, and implement Stakeholder Engagement Plan (SEP) prepared for the Project to guide meaningful and inclusive stakeholder engagement throughout the project lifecycle. If major changes occur in the scope of the TA activities during implementation, the SEP shall be revised and publicly re-disclosed accordingly.</p>	Throughout Project implementation	MOH/GHS
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>An accessible grievance mechanism shall be established, or existing mechanisms reinforced, publicized, maintained, and operated 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.</p> <p>The grievance mechanism shall receive, register, and address concerns and grievances related to sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p>	Throughout Project implementation	MOH/GHS/NHIA
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p>The following training will be undertaken for relevant MOH/GHS/NHIA staff and consultants, district level implementing agencies' staff.</p> <ul style="list-style-type: none"> <li>• TA Project Management (scope, implementation, monitoring and Reporting)</li> <li>• World Bank Environmental and Social Framework and Standards</li> <li>• Labour Management Procedures</li> <li>• Grievance redress mechanism</li> <li>• SEA/SH risk management</li> <li>• Gender and Disability inclusion</li> </ul> <p>Information on World Bank's Safeguards Incidents Reporting Tool (SIRT) provided.</p>	No later than 90 days after the Effectiveness Date and periodically when new Project team members/consultants join the Project throughout implementation.	MOH/GHS/NHIA