



**Republic of Ghana
Ministry of Health**

Ghana Primary Health Care Investment Program (P173168)

**Negotiated
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

May 05, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana (the **Recipient**) will implement the Primary Health Care Investment Program (P173168) including the Investment Project Financing (IPF) Component (the **Project**) and the Program for Results (PforR) Program (the **Program**) (the Program and the Project are jointly referred to as the **Operation**), 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 (the **Association**) has agreed to provide financing for the Project, as set out in the Financing Agreement. This Environmental and Social Commitment Plan (ESCP) only applies to the Project.
2. The Recipient shall ensure that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) and this ESCP in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP may be revised from time to time if necessary, 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 Recipient and the Association agree to update the ESCP to reflect such changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</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&S instruments required under the ESCP, 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>INCIDENTS AND ACCIDENTS</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, inter alia, 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 Association within 48 hours after learning of the incident or accident.</p> <p>Upon request from the Association, a detailed report with root cause analysis and corrective actions shall be provided within a timeframe acceptable to the Association.</p>	MoH/GHS/NHIA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The Ministry of Health (MoH) and Ghana Health Service (GHS) 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 this organizational structure with qualified staff and resources to support management of E&S risks.</p>	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>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Update, adopt, and implement the Stakeholder Engagement Plan that has been prepared for the Project during implementation in a manner acceptable to the Association and consistent with the relevant ESSs.</p>	Throughout Project implementation	MoH/GHS
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MoH/GHS
1.4	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT</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&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&S instruments, within the timeframes specified in said E&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 Section IV.B.4(b) of Schedule 2 to the Financing Agreement for the Project.</p> <p>b) Adopt any required E&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&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	MoH/GHS
ESS 2: LABOR AND WORKING CONDITIONS			

<p>2.1</p>	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Project will be primarily implemented by staff from the MoH, GHS, and NHIA, who shall be subject to the terms and conditions of their existing public sector employment agreement and to ESS2 requirements relating to child labor, minimum age and occupational health and safety (OHS), unless there has been an effective legal transfer of their employment or engagement to the Project (in which case they shall be treated as Project workers and subject to all ESS2 requirements). For any Project workers that may be hired/appointed as needed, the MoH/GHS shall ensure that all Project workers are engaged in the implementation of the Project in a manner consistent with ESS2 and acceptable to the Association.</p> <p>The MoH/GHS shall adopt and implement the OHS measures outlined in the Labor Management Procedures (LMP) for the Ghana COVID-19 EPRP (P174839) and disclosed on June 2, 2021 and update them as needed to address specific risks/impacts associated with the Project. The MoH/GHS shall ensure that the OHS measures adopted for the Project 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.</p> <p>Consultant contracts shall reflect appropriate labor and working conditions including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, as per ESS2, and specific measures on COVID-19 prevention, and general health and safety measures, in a manner acceptable to the Association.</p> <p>SEA/SH prevention and response measures including, inter alia, requirements for consultants to adhere to the GHS Code of Conduct and Disciplinary Procedures shall be applied to all consultants working on any aspect of the TA activities, in a manner acceptable to the Association.</p>	<p>Throughout Project implementation</p>	<p>MoH/GHS</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	Not currently relevant	Not relevant	Not relevant
ESS 4: COMMUNITY HEALTH AND SAFETY			
	Not currently relevant	Not relevant	Not relevant
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not currently relevant based on the scope of the TA activities	Not relevant	Not relevant
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not currently relevant	Not relevant	Not relevant
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not currently relevant	Not relevant	Not relevant
ESS 8: CULTURAL HERITAGE			
	Not currently relevant	Not relevant	Not relevant
ESS 9: FINANCIAL INTERMEDIARIES			
	Not currently relevant	Not relevant	Not relevant
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Update the Stakeholder Engagement Plan (SEP) prepared for the Project, if and as needed, and implement it 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.</p>	<p>The SEP was finalized and disclosed prior to appraisal. The SEP shall be implemented throughout Project implementation.</p>	<p>MoH/GHS</p>

10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>The existing grievance mechanisms shall be 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>	<p>The grievance mechanism shall be reinforced and publicized no later than 6 months after the Effective Date and shall be maintained operational throughout Project implementation</p>	<p>MoH/GHS/NHIA</p>
CAPACITY SUPPORT (TRAINING)			
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"> • TA Project Management (scope, implementation, monitoring and Reporting) • World Bank Environmental and Social Framework and Standards • Labour Management Procedures • Grievance redress mechanism • SEA/SH risk management • Gender and Disability inclusion <p>Information on World Bank's Safeguards Incidents Reporting Tool (SIRT) provided.</p>	<p>No later than 90 days after the Effective Date and periodically when new Project team members/consultants join the Project throughout implementation.</p>	<p>MoH/GHS/NHIA</p>