

United Nations Children Fund (UNICEF)

Emergency Education Response for Afghanistan

Environmental and Social Management Framework

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Abbreviations

ADB	Asian Development Bank
ALCS	Afghanistan Living Conditions Survey
APMU	Afghanistan Programme Management Unit
ARTF	Afghanistan Reconstruction Trust Fund
AWMS	Afghanistan Welfare Monitoring Survey
CBE	Community based education
CERC	contingent Emergency Response Components
C-ESMP	Contractor Environmental and Social Management Plan
CoC	Certificate of compliance
ECW	Education Cannot Wait
EERA	Emergency Education Response for Afghanistan
EHS	Environmental, Health and Safety
ESIA	Environmental and Social Impact Assessment
EMIS	Education Management Information System
EQRA	Education Quality Reform of Afghanistan
ESF	Environmental and Social Framework of the World Bank
ESHS	Environment, Social (including labor), Health, and Safety
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FMFA	Financial Management Framework Agreement
GBV	Gender based violence
GM	Grievance Management
IDPs	Internally Displaced Persons
IE&LFS	Income, Expenditure and Labour Force Survey
MICS	Multiple Indicator Cluster Survey
MoE	Ministry of Education
NEPA	National Environment Protection Agency
NGO	Non-Governmental Organization
OHS	Occupational Health Safety
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SMP	Security Management Plan
TPM	Third Party Monitoring
TPMA	Third Part Monitoring Agent
UN	United Nations
UNICEF	United Nations Children's Emergency Fund
WASH	Water, Sanitation and Hygiene
WHO	World Health Organization

Glossary of Terms Used in the ESMF

Chance finds procedure. A chance find is archaeological material encountered unexpectedly during project construction or operation. A chance find procedure is a project-specific procedure which will be followed if previously unknown cultural heritage is encountered during project activities. The chance finds procedure will set out how chance finds associated with the project will be managed. The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with national law; and to train project personnel and project workers on chance find procedures

Child labor consists of work by children that is economically exploitative or likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.

Compliance compares how well a process meet the requirements placed on the process.

Disposal. Final placement or destruction of wastes, polluted soils, and toxic or hazardous materials. Disposal may be accomplished through approved secure landfills, surface impoundments, or incineration.

Effluent Wastewater treated or untreated, that flows out of a treatment plant, sewer, or industrial outfall; generally, refers to wastes discharged into surface waters.

Environmental, Health, and Safety Guidelines (EHSGs) are technical reference documents with general and industry-specific statements of Good International Industry Practice. The EHSGs contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable cost. For complete reference, consult the World Bank Group Environmental, Health, and Safety Guidelines,

http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/ehsguidelines

Environment and Social Impact Assessment (ESIA) identifies and assesses the potential environmental risks impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures.

Environmental and Social Management Plan (ESMP) details: (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.

Environmental and Social Management Framework (ESMF) is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified.

Good International Industry Practice (GIIP) is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances.

Grievance An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants a project implementor or contractor to address and resolve.

Grievance Redress Mechanism (GRM) is a locally based, formalized way to accept, assess, and resolve community feedback or complaints from individuals or communities who believe they are adversely affected by the Project.

Hazardous wastes By-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Substances classified as hazardous wastes possess at least one of four characteristics—ignitability, corrosivity, reactivity, or toxicity—or appear on special lists.

Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

Labor Management Plan (LMP) set out the way in which project workers will be managed, in accordance with the requirements of national law and the World Bank's ESS.

Lost Time Injury (LTI) is the incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

Mitigation Measures taken to reduce adverse impacts on the environment.

Monitoring Periodic or continuous surveillance or testing to determine the level of compliance with statutory requirements or pollutant levels in various media or in humans, animals, and other living things.

Occupational Health and Safety deals with all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards (WHO).

Solid wastes Nonliquid, non-soluble materials, ranging from municipal garbage to industrial wastes, that contain complex, and sometimes hazardous, substances. Solid wastes include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid wastes also refer to liquids and gases in containers.

Stakeholder Persons or groups who are directly or indirectly affected by a project as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. They may include locally affected communities or individuals and their formal or informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

Stakeholder Engagement is a broad, inclusive, and continuous process between a project proponent and those potentially affected by the project that usually spans the project's life. It includes consultations, information disclosure and dissemination, and participation.

Executive Summary

The Environmental and Social Management Framework (ESMF) has been prepared by UNICEF and is specific to UNICEF's mandate in Emergency Education Response for Afghanistan (EERA). The ESMF approach has been chosen to allow for early identification and potential adverse impacts while providing broad guidance for their effectiveness mitigation. The objective of the framework is to help ensure activities under the project will:

- Protect human health and safety;
- Prevent environmental degradation as a result of either individual sub-projects or their cumulative effects;
- Prevent environmental degradation because of either individual sub-projects or their cumulative effects;
- Enhance positive environmental and social outcomes; and,

Ensure compliance with World Bank ESF standards, UNICEF Environmental and Social Standards (ESS) and complies with Afghanistan environmental and social laws and regulations.

The World Bank is financing the EERA to safeguard education achievements obtained over the past 20 years and contribute to future nation-building efforts of Afghanistan. The Project aims to maintain basic education service delivery, learning continuity and safe spaces for girls and boys in primary and secondary education.

The objectives of the Environmental and Social Management Framework (ESMF) are to

- Provide a framework for environmental and social (E&S) risk and impact management of the project.
- provide clear procedures and methodologies for environmental and social risk screening and monitoring of environmental and social mitigation measures to be financed under EERA Project,
- describe the appropriate roles and responsibilities of UNICEF, Implementing Partners (IPs) and other stakeholders.
- outline the reporting procedures on E&S mitigation measures and other activities related to the project investments.

The ESMF is prepared to meet the requirements of the World Bank's Environmental and Social Framework (ESF), including the World Bank Group Environment, Health and Safety (EHS) Guidelines. The ESMF also meets the UNICEF's ESS and complies with Afghanistan environmental and social laws and regulations.

UNICEF has also prepared an Environmental and Social Commitment Plan (ESCP) Stakeholder Engagement Plan (SEP) which was publicly disclosed on 25th of August 2022. The ESMF includes a simplified Labour Management Procedures (LMP), generic Environmental and Social Management Plan (ESMP) for minor civil works. UNICEF has also developed a Gender-Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) action plan with specific and time-bound actions to mitigate the SEA/SH risks. The Security Management Plan (SMP) has been developed separately based on the UN security protocols to complement the ESMF.

The Project has 3 components as follows:

Component 1: Support Access to Learning Opportunities This component will support access to learning opportunities in basic education. The project will support relevant institutions (NGOs, CSOs, etc.) to provide both formal and informal education programs to primary and secondary age students.

Component 2: Improving Learning Conditions at project-supported schools This component will improve

learning conditions at project-supported schools. The project will provide WASH facilities, boundary wall and high-performance tents to respond to the strong demands from public schools without school buildings.

Component 3: Strengthening monitoring and ensuring accountability. The aim of this component of the project is to ensure continued access to general education services for target children

Potential Environmental and Social Risks and Mitigation Measures

Environmental and social risks for the EERA project are classified as substantial. The environmental risks are classified moderate while social risks are classified as substantial. The project will support construction/rehabilitation of WASH facilities and boundary walls within the existing footprint of schools. There are no envisaged impacts on biodiversity or cultural heritage under EERA.

Environmental risks include:

- Issues relating to on-site storage of construction material;
- Storage and disposal of construction waste;
- Generation of noise and dust during construction;
- Soil erosion during construction;
- Accidents and occupational, health and safety risks during construction and operational phase;
- Odor and pest nuisance using operational phase;
- Spillage of black water during the operational phase.

Social Risks include:

- Possible tension and conflicts among beneficiary communities and districts
- Corruption and non-transparency in implementing Component 2 (CBE)
- Increased exposure to COVID 19 virus to children, teachers and communities due to lack of masks, social distancing, low vaccine coverage for teachers and students
- High SEA/SH risks in schools
- Safety risks to building users (students/teachers/visitors/other support staff) during execution of construction work
- Occupational health and safety risks to workers during construction
- Minor labor influx affecting security and mobility of girls and women within school and larger community
- Low capacity of NGOs and contractors to manage E&S risks following ESF
- Exclusion and discrimination of potential beneficiaries
- Security within the country, which could expose students, teachers and communities to security risks.

UNICEF has prepared this ESMF and supporting E&S management instruments to ensure that all interventions meet the objectives and requirements of the World Bank's ESF as well as UNICEF's Environmental and Social Standards. The provisions of the E&S instruments will be followed through relevant contracting documents and monitored through reporting mechanisms with IPs and contractors to effectively address environmental and social risks and impacts associated with the project. The project SEP outlines ways in which the project will

engage with stakeholders and summarizes key stakeholder engagement activities to date.

UNICEF is responsible for the overall implementation of the ESMF. UNICEF aims to operationalize its ESSs through the whole scope of intervention from planning (to assess environmental and social risks), through implementation (programmatic risk mitigation and management) and compliance evaluation (to ensure a robust process of accountability). The ESMF implementation will draw on the organization's efforts for a full integration and mainstreaming within relevant internal regulations, processes, and systems.

Dedicated E&S personnel will include Environmental Specialist, Social Specialist, SEA/SH Specialist shared between health and education projects. UNICEF will contract and supervise Service Provider NGOs (SPs) as IPs to deliver the services. UNICEF or its contracted IPs will also hire and supervise Contractors for the construction/rehabilitation works. Through their contracts and scope of work, IPs and Contractors will be responsible for complying with environmental and social risks mitigation measures as well as the labour management procedures included in the ESMF. UNICEF will implement training on guidelines and procedures particularly on ESMP implementation to ensure IPs and Contractors are aware and able to comply to with the ESMF requirements.

UNICEF will screen all subproject proposals to: (i) determine the environmental and social issues that might result from the subproject, (ii) identify the relevant Environmental and Social Standards (ESSs); (iii) determine the appropriate Environmental and Social risk rating for the subproject, and; (iv) specify the type of environmental and social assessment required, including specific instruments/plans.

All project activities may not require a full Environmental and Social Impact Assessment (ESIA). The project will use a generic ESMP template in this ESMF to guide the preparation of site-specific Environmental and Social Management Plans (ESMPS) for sub-projects. The template can be adapted as required.

UNICEF will apply the World Bank's requirements for **consultation and disclosure**, as detailed in the Project SEP. Consultations will be initiated as part of sub-project screening exercises and continued throughout project implementation. Consultation records will be attached to the required safeguards instruments and copies will be kept in the Project Office. Consultations will take into consideration the sociocultural context of Afghanistan.

UNICEF will incorporate **environmental and social requirements for contractors** in tender documentation and contract documents, so that potential bidders are aware of environmental and social performance requirements expected from them and are able to reflect that in their bids. The cost to contractors of meeting the ESHS requirements will be included in their respective contracts. UNICEF will monitor compliance by contractors with these requirements.

The requirements include the following sections:

- i Contractor Environmental and Social Management Plan (C-ESMP)
- ii ESHS Training
- iii Construction Site Management
- iv Simplified Labour Management Procedures
- v GBV/SEA/SH mitigations measures
- vi Occupational Health and Safety (OHS)
- vii Road safety and Traffic Safety
- viii Emergency Preparedness and Response
- ix Stakeholder Engagement

x Code of Conduct

UNICEF will **monitor and report** on implementation of the ESMF, with inputs from the TPM agent.

The Project will use the Grievance Redress Mechanism (GRM), as detailed in the Project Stakeholder Engagement Plan, which will be used for environmental, and social issues. The ESS Specialist in UNICEF will handle Project activity-related complaints.

The overall ESMF implementation budget for the project amounts to US\$900, 000. The cost of due diligence for specific subprojects (Training and capacity building, update of ESS documents , consultations, GRM, preparation of ESMPs, and monitoring) are included in the costs/budget in the overall budget.

1 Overview and Introduction

1.1 Introduction

The Environmental and Social Management Framework (ESMF) has been prepared by UNICEF and is specific to UNICEF's mandate in the Emergency Education Response for Afghanistan (EERA).

The objectives of the ESMF are to:

- Provide a framework for environmental and social (E&S) risk and impact management of the project,
- provide clear procedures and methodologies for environmental and social risk screening and monitoring of environmental and social risk mitigation measures to be financed under the EERA Project.
- Describe the appropriate roles and responsibilities of UNICEF, Implementing Partners (IPs) and other stakeholders.
- Outline the reporting procedures on E&S mitigation measures and other activities related to the project investments

The ESMF is prepared to meet the objectives and requirements of the World Bank's Environmental and Social Framework (ESF), and the World Bank Group Environment, Health and Safety (EHS) Guidelines. The ESMF also complies with the UNICEF Environmental and Social Standards and Afghanistan environmental and social laws and regulations.

The ESMF will guide UNICEF to ensure that all interventions meet the requirements of the ESF, including the preparation of sub-projects or activities specific Environmental and Social Management instruments as relevant to the activity nature, type and scale in accordance with the ESF. For this purpose, the ESMF details how UNICEF will assess the environmental and social risks and impacts, identify the necessary mitigation measures, and monitor the ES measures implementation, most particularly the environmental and social performance of Project contractors/activities implementers.

UNICEF has prepared separately a detailed Stakeholder Engagement Plan, GBV/SEA/SH action Plan and SMP.

1.2 Project Overview

The World Bank is financing the EERA (P178758), under the provisions of World Bank OP 10.00, paragraph 12, *Projects in Situations of Urgent Need of Assistance or Capacity Constraints*. The Project will be implemented by the United Nations Children’s Fund (UNICEF). UNICEF will implement all the four Components of the project, in partnership with local Partners. The Project will be financed by the World Bank through the Afghanistan Reconstruction Trust Fund (ARTF).

The overall objective of the EERA is to maintain basic education service delivery and learning continuity for girls and boys in primary and secondary education. This short-term, 18 months emergency project is essential to safeguard education achievements obtained over the past 20 years and contribute to future nation-building efforts. It seeks to ensure that learning continues for all children in basic education, at levels similar to pre-August 15, 2021.

This project is also designed as a Phase 1 approach to a longer-term engagement which will build upon lessons from this first phase. The project has three components: Component 1: Support Access to Learning Opportunities; Component 2: Improving Learning Conditions at project-supported schools 3: Strengthening monitoring and ensuring accountability.

1. Component 1: Support Access to Learning Opportunities

2. This component will support access to learning opportunities in basic education. The project will support relevant institutions (NGOs, CSOs, etc.) to provide both formal and informal education programs to primary and secondary age students. Specifically, this component will cover CBE as sub-component 1.1 and an NGO Block Grants as sub-component 1.2.

Sub-component 1.1: Support to Community Based Education

3. **The objective of this sub-component is to ensure access to basic education for out of school children, particularly girls, through support to CBE.** Currently, UNICEF is supporting around 15,000 CBE classes in 23 provinces, benefitting an estimated 450,000 students. Recently, due to expanded access, CBE classes have been set up in areas that were previously hard-to-reach and that have been deprived of any public investments (i.e., where there are no schools). As CBE is fully donor funded through relatively short-term financing commitment (1–3 years) and through a cohort approach¹, smooth transition and donor coordination are key in the program’s sustainability. CBE transition rates are low as the public education system is overstretched and underfunded. While it is crucial to maintain financing CBEs to reach the most disadvantaged children, the issue of sustainability of the CBE system whether in the form of improving transition rates or the expansion of the public schools’ network to ensure continuity of education should be pursued with the Ministry of Education as well as those that support its financing, should the environment for policy dialogue becomes available. In the meantime, it is equally important, in the absence of an expanded network of public schools, to continue the discussion on prospects for continuity of funding for CBE among development partners to ensure learning opportunities for these children to complete a critical cycle of education.
4. **This sub-component will maintain access for out of school children in primary level, with a special focus on girls, and disadvantaged groups in remote and conflict-affected communities, through continued support of existing CBE classes as well as the establishment of new classes, in coordination with relevant**

¹ Most CBE projects are based on a cohort approach: they support a specific group of children for three years, after which they are to integrate in public schools.

partners (including ADB, NGOs, Education Cannot Wait—ECW, Global Partnership for Education and other bilateral donors) that also (have) support(ed) CBE. Specifically, through this component, an estimated 5,000 CBEs² will be supported and will benefit approximately 150,000 girls and boys in disadvantaged communities. UNICEF will be requested to prioritize CBEs in areas that were identified by the EQRA project mapping exercise which was completed in June 2021 to identify lagging villages in terms of out of school children and CBE coverage, not yet covered by other partners. This component will also include specific CBE classes³, whose funding will run out by the end of 2022, and with cohorts that have not completed a three-year cycle or are not able to transit to public schools. The basis for identification of support to existing or newly to be established CBE classes will be the CBE database that has been set up jointly by UNICEF and the Education Cluster and provides a clear picture on gaps in CBE provision. A detailed package of CBE services, like the one used by the ADB and the CBE cluster, will be provided under the project, comprised of teacher recruitment, training, deployment, remuneration, the provision of teaching and learning materials, CBE supplies, and handwashing, sanitizing and hygiene kits. The training package for teachers will include elements on awareness on climate change and its impact on vulnerable communities, amongst other aspects. As the project implementation phase is only 18 months, the CBE classes under EERA project will run for 1 or maximum 1.5 cycle. It is assumed that CBEs established under EERA will be maintained and financed by other sources, such as GPE or ECW, after the EERA implementation period to complete a minimum of 3-year education cycle. To ensure continuity of learning of CBE cohorts, a more programmatic approach to CBE is required based on pooled funding, rather than current project-based approached.

Sub-component 1.2: Innovative Block Grants Program to promote inclusion

5. A key objective of this sub-component is to support approaches to provide options to remain engaged in learning for secondary school girls who have been forced to stay at home since September 2022. Through the NGO Block Grants activity, the project will aim to support innovative, ongoing initiatives by NGOs and others which aim to provide learning opportunities for secondary female students that are excluded from going to school focused on catch up and skills development, including socio-emotional skills, among others, using a variety of approaches involving no, low, or high technology, depending on feasibility in specific contexts. This will require supporting programs implemented through NGOs (local and international) as well as private entities which have shown promise, and which have implementation, expansion readiness on the ground and potential for future scale up. A menu of eligible activities for financing under the Block Grants will be developed to encourage innovative solutions as specified in the Project Operations Manual (POM).
6. A Block Grants Management Team (BGMT) will be established in UNICEF to manage the grant proposal review, selection, implementation, monitoring, and assessment, using its existing UNICEF procedures. Under the proposed scheme, approximately 15-25 Programs are expected to be selected. The amount for one program ranges from \$50,000 to \$250,000. UNICEF, through its partner networks (including the cluster and DPG), will solicit applications. A committee comprised of representatives of the Cluster and the DPG will be set up to agree on the proposals to be supported. To be eligible for participation in the process of Block Grants program, institutions must meet the criteria stated in the POM. The POM will also provide the guidelines regarding the application process, eligible expenditures, reporting duties, and other requirements. Assessment of each sub-project will be carried out to determine whether they are implemented as planned, if the program has the potential to be implemented at scale in future, etc.

² More detail breakdown of the expected number of CBEs by province as well as level of education (primary/secondary) will be described in the POM, in terms of continuity and newly to be established classes.

³ This is independent of who is currently supporting these classes, through UNICEF or otherwise.

Component 2: Improving Learning Conditions at project-supported schools

7. This component will improve learning conditions at project-supported schools. The project will provide WASH facilities, boundary wall and high-performance tents to respond to the strong demands from public schools without school buildings. This component will also distribute Teaching and Learning Materials (TLM) for basic education students and teachers at project-target public schools.

Subcomponent 2.1: Gender focused rehabilitation of school infrastructure

8. **Gender-focused rehabilitation/ construction of school infrastructure⁴ increases access and attendance and improves student learning. With strict adherence to the ITA's policy of gender segregation, demand for gender segregated WASH facilities and boundary walls will increase.** This sub-component aims to provide safe and inclusive learning spaces for all children in project-supported schools through the gender-focused rehabilitation/new construction of school infrastructure. Approximately 193 girls', boys', and mixed schools⁵ out of 450 previously identified schools under EQRA will be selected to receive EERA's support for infrastructure rehabilitation/new construction to welcome girls and encourage their regular attendance. These schools were identified as a part of the EQRA school infrastructure needs assessment in provinces with the highest number and percentage of out of schoolgirls. UNICEF will verify these needs as part of their initial survey and should these needs be met by other donors or other places with higher needs identified, UNICEF will propose changes in the list of schools to be targeted under the project, provided that the same criteria (girls/boys/mixed⁶ schools) and where land acquisition is not needed) are followed. Eligible school infrastructure improvement will include WASH facilities (water points, sewage system, handwashing facilities, and gender-segregated toilets), and the construction of boundary walls to guard the perimeter of schools. Based on the status of existing infrastructure, some schools will be selected to receive support for provision of missing component which may include both WASH facilities and boundary wall, or only WASH facilities or only boundary wall. The proposed light civil works will be implemented in the existing school premises.
9. **This sub-component will also support construction of safeguard mitigation measure for 12 schools that were identified under the EQRA project and categorized as critical, enabling them to become operational.** In addition, simple check list will be used for ESS assessment of other schools and required mitigation measures will be provided. When constructing these elements, the project will incorporate climate resilient design measures and disaster risk mitigation plans. For example, construction of boundary walls and toilet blocks will be done using locally available materials as much as possible; appropriate measures would be undertaken to protect the WASH facilities from floods (raised toilets); the foundations and design of the boundary walls will be adjusted to withstand the local topographical conditions, as well as solar power will be used for lifting the water from groundwater sources. UNICEF will contract private construction firms and (I)NGOs to implement these projects. While constructing latrines, compliance will be made, where possible, with the national standard of 50 students to one toilet to ensure sustainability of WASH facilities. In addition,

⁴ The situation of school infrastructure in Afghanistan is dire: half of existing schools lack buildings (8,500 out of 17,000 schools), and students are taught under tents, in the open air, or in spaces that lack proper infrastructure, all of which continues to hinder girls' attendance. At the national level, the student-toilet compartment ratio is 172 students per toilet compartment. This results in the rapid decay and damage of toilet facilities. Additionally, only 65 percent of schools have access to safe drinking water, and only 37.5 percent of schools have boundary walls (EMIS 2019).⁴ These elements are considered essential for providing a conducive environment for attendance and learning, particularly for girls.

⁵ 79 schools with full WASH package and boundary walls, 57 schools with only WASH package and 57 schools with only boundary walls (these figures could be revised due to the status of the current sites). It is expected that 180,000 girls will attend these schools once the rehabilitation is completed.

⁶ Mixed schools concern schools attended by both boys and girls, albeit mostly in different shifts and/or different classrooms. This does not refer to co-education.

a special room for menstrual hygiene management (MHM) will be constructed in girls' and mixed schools for girls as per national standards. In areas where there is water shortage, or freezing issues in winter, dry toilets will be promoted as per local context. Holding tanks will be constructed in about 100 of 136 schools.

10. In addition, **this sub-component will provide, distribute, and set high performance tents (HPT) for schools that lack sufficient and safe school buildings** (e.g., schools without buildings, overcrowded schools with buildings, etc.). Specifically, this sub-component aims to provide 4,000 HPTs for 1,000 schools or more (maximum four HPTs can be allocated for one target school). UNICEF team is going to select the target schools based on the updated demands (informed by the nation-wide data collection). The POM will provide details on the number of tents that any school could be eligible to receive to ensure equity and prevent unfair distribution of tents to only a few schools. UNICEF procured and provided 468 HPTs in 2021 to improve learning conditions of 14,040 students. One HPT can accommodate around 30 students per shift and will last between 3 and 5 years.

Subcomponent 2.2: Distribution of Teaching and Learning Materials

11. So far, there is no ITA budget allocated for teaching and learning materials in public schools in 2022. UNICEF has been able to provide basic learning materials for all grade one and five students, both girls and boys. Given the increase in poverty, lack of learning materials has become a critical factor behind many families' decision to send their primary and secondary students.⁷ This sub-component will provide appropriate Teaching and Learning Materials for students and teachers in public primary schools. These include basic materials such as (coloring) pencils, sharper, eraser, notebooks classroom posters, teaching charts, supplies for math and science lessons etc. These will be procured mostly through global LTA holders, some of them in the region brought to in-country warehouses and distributed accordingly based on a clear distribution plan where possible, local production will be supported, as in the case of the schoolbags⁸. The TLM component will complement the ongoing activity of printing and distribution of the textbooks project, originally initiated under USAID funding, now covered through UNICEF with other resources. TLM combined with the textbooks will partially respond to the materials needs of the students and teachers to facilitate an efficient and effective teaching and learning process.

Component 3: Strengthening monitoring and ensuring accountability

Sub-Component 3.1: Strengthening monitoring and ensuring accountability

12. **The aim of this sub-component is to ensure continued access to general education services for target children**, especially among the most vulnerable and hard to reach; promote quality of education service delivery; ensure effective (financial) resource management, including fraud prevention), in accordance with UNICEF policies, procedures, rules and regulations; identify bottlenecks to service delivery and quality and take action to address them; and cover project management and operating costs. These aims will be achieved through UNICEF's internal due diligence procedures as well as specific interventions that focus on core education data collection on key education indicators related to service delivery and quality. The collection of core data on key education indicators will feed into a joint monitoring framework of the Afghanistan Education Sector Transitional Framework (AESTF) being developed to be agreed by the DPG. The data collected at school level will be triangulated with the household survey (HHS) or Multiple Indicator

⁷ Save the Children Assessment 2022.

⁸ UNICEF aims to support a local company that only employs female staff with high capacity to produce schoolbags. Currently negotiations are ongoing to ensure fair wages and working conditions for staff.

Cluster Survey (MICS) conducted by UNICEF partially with other resources.

- a) **Core education data:** Data on key informative indicators through school-based data collection (Census) (such as number of students enrolled by gender, number of open/closed schools, number of teachers attending by gender), is currently being collected by UNICEF (outside the scope of this project) to set a new baseline for 2022 (post COVID-19 and post-political transition). During the 18-month project period, at least one other school-based data collection exercise will take place to verify progress on key education indicators. The Bank will use data of these exercises for the purpose of education sector analysis in line with DPG M&E framework. Selection of indicators will be aligned to Afghanistan Education Sector Transition Framework (AESTF) Goal 3: Sustaining Systems' components respond effectively to functional sector needs as well as with the Development Partners Group M&E Framework.
- b) **Household Survey (HHS) or Multiple Indicator Cluster Surveys (MICS):** this component, partially funded through complementary sources, has a specific focus on Foundational Learning (FL) but looks beyond education. The additional education-related HHS data will be collected through MICS and reported once over the 18-month project period. This data will provide additional evidence with regards to education participation and will be comparable with previous household surveys (the last one conducted in 2019–20) to assess the general education status.
- c) **Third-party monitoring (TPM)** will be divided between UNICEF contracted TPM (in further text UNICEF TPM) and the ARTF contracted Monitoring Agent (in further text ARTF MA). UNICEF TPM⁹ will be responsible for monitoring programming at the level of UNICEF's overall education program (components 1 and 2) to demonstrate results and impact to contribute to implementation improvement and further planning. The ARTF MA will (i) provide project-level physical performance monitoring of inputs and outputs complementary to UNICEF TPM and focused on sites supported by this project and (ii) monitor and report on ECA. Data from UNICEF TPM and ARTF MA will be triangulated for analysis in line with DPG Monitoring and Evaluation Framework for UNICEF, WB and ARTF donors and assessing whether the conditions are in place to allow EERA programs to proceed. Both UNICEF TPM and ARTF MA will have responsibility for monitoring Environmental and Social Safeguards (ESS). Detailed delineation of roles and responsibilities, methodology and sampling approaches are provided in the Terms of Reference for Monitoring Support to EERA Project.
- d) **Internal monitoring through UNICEF's staff and extenders**, with a focus on monitoring implementation, complementary to UNICEF TPM and ARTF MA, as well as ECAs (following public announcement at national and provincial level). The logic of UNICEF integrated monitoring framework will be provided in the POM.

Sub-Component 3.2: Project implementation and coordination

13. This sub-component supports project implementation and coordination (includes UNICEF cost recovery and direct costs of total project cost included under the UN operational cost). This will support the Recipient's direct and indirect costs. The direct costs will focus on project implementation and coordination, as well as ensuring monitoring and evaluation (M&E) of overall institutional, strategic/programmatic, operational, and contextual risks across the program through functions across the office (e.g., financial management, human resources, supply and logistics, partners' management, information and communications technology

⁹ Focus of UNICEF TPM is programmatic. The project will contribute proportionally to this TPM for the monitoring of components 1 and 2 as both the CBE Pops and TLM receive funding from other sources as well.

systems and information security). It will also support the regular reporting to the WB. Specific activities include direct operational management and supervision costs required to support project implementation (including the use of remote monitoring technology), such as: (i) handling procurement, financial management, liquidity management and disbursement management, including the preparation of withdrawal applications under the Project ; (ii) ensuring risks are mitigated and compliance, including application of UNICEF regulatory framework (ex. HACT)¹⁰; (iii) ensuring that all reporting requirements for ARTF are met according to the Project Grant Agreements; (iv) establishing an operational grievance redress mechanism (GRM) for UNICEF supported activities to document any possible complaints and ensure follow-up; and (v) operating costs to support result delivery.

1.3 Rationale

In line with ESS1, the Project uses an Environmental and Social Management Framework instead of an Environmental and Social Impact Assessment (ESIA) and an Environmental and Social Management Plan (ESMP) because the exact nature and location of subprojects and their impacts are not fully known at the time of Project appraisal.

As indicated in ESS1:

The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. It includes adequate information on the area in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

1.4 Lessons Learned

The implementation of the different components builds on experience with implementation of similar projects. For example, Component 1 builds on the experience with the current 2-months payment of emergency teacher support, funded by another donor. Key lessons learned, that have been integrated into the current project design are the need to i) include all school-based staff that ensure schools to stay open and allows teachers to teach, and ii) adjusting payment from a flat rate of USD 100 to actual paygrade that mirrors staff salaries. The two measures, based on lessons learned, will mitigate both exclusion at school level, and facilitate transition back into the government payroll system, whenever ready. UNICEF has been managing CBE classes for many years now (Sub-Component 21.1) and the proposed interventions aim at sustaining the demand at local level that has been created in communities where CBE classes are currently running, as well as reaching out to areas where children have no access to learning opportunities (ensuing inclusion of the excluded).

UNICEF has been providing both the software and the hardware support for effective WASH facilities in schools in line with the School Health Policy, which provides a balanced national WASH programming framework for creating a child-friendly educational environment at the school level that assures access to and use of safe drinking water, sanitation and hygiene services, actively promotes healthy behavior, and fosters a sense of inclusion, reciprocity and mutual responsibility on the part of all stakeholders. In 2020, the National Standards

¹⁰ This includes capacity building of IPs in financial management, PSEA, GBV risk mitigation, Environmental and Social Safeguards, and programme and financial assurance.

and Construction Manual for WASH in School was developed and now in use to address inappropriate school WASH facilities. These new standards ensure a harmonized approach towards the construction of WASH facilities in schools by all stakeholders. The newly developed standard fulfills different needs of boys and girls including, washroom for safely menstruation management for girls, facility for children with disabilities, adequate number of latrines which are clearly separated for boys and girls, attached with the provision of water for washing and handwashing facilities close to the latrine for maintaining hygiene practices.

2 Legal and Regulatory Framework

This ESMF is prepared to:

- (i) meet the requirements of the World Bank’s Environment and Social Standards (ESS), including the World Bank Group Environment, Health and Safety (EHS) Guidelines, and other guidelines and guidance;
- (ii) meet UNICEF’s ESS relevant policies, procedures and guidelines; and
- (iii) comply with national environmental and social laws and regulations.

2.1 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework (ESF) sets out the World Bank’s Commitment to sustainable development. It includes a set of ten ESS standards that establish the mandatory requirements that the Borrower and the projects must meet through the project life cycle. The standards establish objectives and requirements to avoid, minimize, reduce, and mitigate environmental and social risks and impacts, and to compensate for or offset any residual impacts. The relevant ESS are presented in Table 1.

Table 1: Relevant ESS Standards

World Bank ESS standards	Relevant to EERA Project? (Y/N)	Rationale
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Yes	<p>ESS1 discusses the borrower’s responsibilities in identifying and managing the E&S risks/impacts of the project. ESS1 is relevant as there are potential environmental and social risks and impacts associated with the project’s interventions that mitigation actions would be required. The project could cause environmental, social, labour, security, health and safety risks due to the nature of the operation</p> <p>For this project, the EHS General Guidelines is applicable containing specific environmental, health and safety measures for construction and rehabilitation of WASH facilities and boundary walls within the school premises. The General Guidelines will provide measures on environment, occupational health and safety, community health and safety, and construction, operational and decommissioning.</p>

		<p>The ESCP was prepared and disclosed on 25 August 2022 to provide high level commitment from UNICEF to ensure mitigation and monitoring of ES&S risks as well as management of impacts of EERA. The ESMF guides the preparation and implementation of site-specific safeguard instruments.</p>
<p>ESS 2: Labour and Working Conditions</p>	<p>Yes</p>	<p>ESS 2 deals with labour related issues associated with project activities. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law. The project implementation will involve direct workers (Consultants and staff recruited by UNICEF), contracted workers (workers of IPs and Contractors). The LMP for the project is included in Annex 2 of this ESMF.</p> <p>The workers may be exposed to OHS risks including infection and disease as well as minor construction related OHS risks. Labour related issues could also include discrimination in recruitment, forced and child labour, unsafe working conditions.</p> <p>UNICEF personnel may report possible misconduct or wrongdoing to UNICEF's Office of Internal Audit and Investigations (OIAI) via established reporting channels. This may include the following: fraud; corruption; workplace harassment; sexual harassment; abuse of authority; discrimination; retaliation; sexual exploitation and abuse; or any other failure to observe prescribed regulations, rules, policies and procedures and standards of conduct.</p> <p>Contractors shall put in place a GRM for its workers and the workers of its subcontractors that is proportionate to its workforce. The GRM for workers shall be distinct from the Project level Grievance Mechanism described in the Project SEP. Contractors are also required to report allegations of fraud and corruption and sexual exploitation and abuse directly to UNICEF in accordance with standard contractual terms and conditions.</p> <p>The LMP prepared as part of this ESMF will guide labour relations under EERA. The ESHS and site/sub project specific ESMPs will contain measures to minimize and mitigate labor risks associated with particular sub projects</p>
<p>ESS 3: Resource Efficiency and Pollution Prevention and Management</p>	<p>Yes</p>	<p>ESS 3 addresses efficient resource use and pollution prevention. Waste may be generated from construction/rehabilitation of WASH facilities and construction of boundary walls including use of water, sand and energy. During operation, potential impacts include odor and contamination of ground water and spillage of black water.</p> <p>ESMF provides broad mitigation measures to deal with waste</p>

		generation and utilize resources efficiently but minimization and mitigation for sub projects will detailed out in site specific ESMPs
ESS 4: Community Health and Safety	Yes	<p>ESS 4 discusses the need and requirement for community Health and safety issues in World Bank financed projects. SEA/SH perpetrated by project workers and actors, accidents, and security issues particularly in conflict-affected and remote areas. Increased traffic during construction could generate hazards to the community. Water related diseases emanating from black water contamination as well transmittable diseases such as COVID 19 and sexually transmitted diseases. Infrastructure under construction could pose risks from design and structural failures.</p> <p>The ESMF, ESHS and ESMP provides mitigation measures for these impacts and risks</p>
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	No	ESS 5 deals with land acquisition, restrictions on land use and involuntary resettlement issues in World Bank financed projects. Rehabilitation works are expected to occur in existing school facilities and will not impact private lands and assets. No land acquisition is envisaged under this project and thus the standard is not relevant.
ESS 6: Biodiversity Conservation and sustainable Management of living Natural Resources	No	ESS 6 deals with biodiversity conservation and sustainable management of living natural resources. This standard is not relevant as project will operate within existing school facilities/physical footprint which are not close to any critical and natural habitats and other environmentally sensitive areas.
ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	No	ESS 7 seeks to mitigate adverse impacts of projects and promote sustainable development benefits and opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in a manner that is Accessible, culturally appropriate, and inclusive. This standard is not relevant as there are no Indigenous People that meet the criteria of ESS 7 in the country that could potentially benefit or be adversely affected by the Project's activities.
ESS 8: Cultural Heritage	No	ESS 8 sets out general provisions on risks and impacts to cultural heritage from project activities. This standard is not relevant as the project is not expected to affect any tangible or intangible Cultural Heritage as activities are to be carried out in existing school footprint.
ESS 9: Financial Intermediaries	No	ESS 9 sets out how Financial Intermediaries will assess and manage environment and social risks and impacts associated with subprojects. The standard is not relevant as the Project does not include financial intermediaries.
ESS 10: Stakeholder Engagement and	Yes	ESS 10 recognizes the importance of open and transparent engagement with project stakeholders. UNICEF has developed a

Information disclosure		<p>SEP for the EERA project. The SEP is also in line with the principles outlined in UNICEF’s Social and Environmental Sustainability Standards. The SEP lays out the plan for meaningful consultations and engagement with all stakeholders throughout the project lifecycle, including information disclosure and grievance management.</p> <p>Due to the emergency situation and COVID-19 constraints, the SEP has been updated with limited consultations. It would be a live document which shall be updated during implementation based on the ongoing consultations.</p>
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The project will also apply the Environmental, Social, Health and Safety (ESHS) requirements in Annex 3 which are aligned to the following guidelines and Good Practice Notes:

- WBG General EHS Guidelines, 2007
- World Bank Good Practice Notes:
 - Addressing SEA/SH in investment projects financing involving in major civil works, 2020
 - Addressing Gender based violence in Investment Project Financing involving major civil works, 2018
 - Road safety, 2019
 - Assessing and managing the risks and impacts of the use of security personnel, 2018
- Managing the risks of adverse impacts on communities from temporary project induced labour influx, 2016
- World Bank Technical Note on Public Consultations and Stakeholder Engagement in World Bank-Supported Operations when there are Constraints of Conducting Public Meetings, 2020

2.2 Environmental and Social Risk Classification

The overall environmental and social risk classification is Substantial for the EERA Project. The World Bank will review the risk classification on a regular basis during implementation, and can change the classification if necessary, to ensure that it continues to be appropriate.

For this project, the EHS General Guidelines is applicable containing specific environmental, health and safety measures for construction and rehabilitation of WASH infrastructures and boundary walls within the school premises. The General Guidelines will provide measures on environment, occupational health and safety, community health and safety, and construction and decommissioning.

2.3 UNICEF Environmental and Social Standards

UNICEF is in the process of developing a comprehensive set of environmental and social safeguards that will be applicable to all the Projects it implements. The safeguards will be based on the Model Approach to Environmental and Social Standards for UN Programming. The Model Approach represents a key step in moving towards a common approach among UN entities for addressing environmental and social standards for UN programming.

UNICEF has drafted a policy on ESS, which is now being finalized for adoption. These standards apply to underpin UNICEF’s commitment to mainstream social and environmental sustainability to support sustainable development. Through application of the ESS, UNICEF enhances the consistency, transparency and accountability

of its decision-making and actions, improves performance, and strengthens achievement of sustainable development outcomes. The main objectives of these standards are:

- Strengthen the quality of programming by ensuring a principled approach
- Avoid adverse impacts to people and the environment
- Minimize, mitigate, and manage adverse impacts where avoidance is not possible
- Strengthen UNICEF and partner capacities for managing social and environmental risks
- Ensure full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people

The ESS are an integral component of UNICEF’s quality assurance and risk management approach to programming. Table 2 presents the relevant elements of UNICEF's ESS.

Table 2: Key Elements of UNICEF's ESS

UNICEF ESS	Relevant to EERA Project (Y/N)	Rationale
ESS1 Labour and working Conditions	Yes	The project implementation will involve direct workers (Consultants and staff recruited by UNICEF), contracted workers (workers of IPs and Contractors). This standard ensures UNICEF projects workers and beneficiaries’ safety and health. Prevention forced labour, child labour and SEA as well as prevention and mitigation of discriminations by including the disadvantaged and vulnerable.
ESS 2 Resource efficiency and pollution prevention	Yes	Project will generate waste from construction/rehabilitation works and efficient use of resources. This standard deals with reducing waste generation, recycling and ensuring proper and safe disposal. Controlling pollutions, emissions and hazardous substances.
ESS 3 Community Health, Safety and Security	Yes	ESS3 is relevant to avoid and mitigate adverse impacts on human health. Ensuring occupational health and safety on construction sites and avoiding social tensions or conflicts between communities or within a community as well as with project implementing entities. There is also the need to minimize accidents that will result in loss of live and property of community members
ESS 4 Displacement and involuntary resettlement	No	ESS4 aims to prevent, avoid then mitigate involuntary/economic resettlement. Enhancing community consultation and participation. This standard is not relevant as project will operate in existing school facilities/physical footprint
ESS 5 Biodiversity conservation and sustainable resources	No	ESS5 deals with promoting equitable access and sustainable management and consumption of natural resources. Maintaining and preserving

management		the benefits of ecosystems and ecosystem services. This standard is not relevant as project will operate in existing facilities/physical footprint away from critical and natural habitats as well as other environmentally sensitive areas.
ESS 6 Indigenous people	No	ESS6 deals with ensuring that projects don't impact indigenous people, their lands, territories, resources. Providing just and equitable opportunities for indigenous people in culturally appropriate manner. This standard is not relevant as there are no Indigenous People that meet the criteria of ESS7 in the country that could potentially benefit or be adversely affected by the Project's activities
ESS 7 Cultural Heritage	No	ESS7 deals with preserving and promoting Cultural Heritage and promoting equitable sharing of benefits from Cultural Heritage. This standard is not relevant as the project is not expected to affect any physical Cultural Heritage as activities are to be carried out in existing facilities
ESS 8 Climate change and disasters risks reduction	Yes	ESS8 deals with integrating climate resilience considerations in projects. Mitigating vulnerability of communities to climate change impacts or disaster risks and reducing GHG emissions. Afghanistan, where EERA will be implemented, is prone to climate induced natural disasters such droughts, floods and harsh winters.

2.4 National Requirements

The EERA will be implemented within the framework of international standards presented above and the relevant national laws. In addition to the ESS, the EERA project will be implemented in accordance with the Afghan national environmental and social regulatory framework. Afghanistan is in transition, and it is not clear which national laws and policies remain valid. The following laws are relevant if they remain valid:

- Environmental Protection Law 2007
- Environmental Impact Assessment Regulation 2017
- Land Acquisition Law 2017
- Afghanistan Labour Law 2007
- National Labour Policy 2017
- The Water Law 2009The National Disaster Management Law 2012

UNICEF and IPs will apply the relevant national laws and regulations and collaborate with the relevant authorities, as applicable. Where national laws and policies are inconsistent with the World Bank ESF or UNICEF Environmental and Social Standards, the aim will be to apply whichever standards are more stringent.

2.5 International Conventions

Afghanistan is party to a member of international environmental, social and labour agreements, the most important of which are shown in Table 3.

Table 3: Afghanistan International environmental, social and labour agreements

Convention	Ratified
Convention concerning the Protection of the World Cultural and Natural Heritage.	20/03/1979
Convention on Biological Diversity	19/09/2002
Convention on the Conservation of Migratory Species	01/08/2015
United Nations Framework Convention on Climate Change	19/09/2002
o United Nations Convention on Combating Desertification	1/11/1995 (accession)
o Environmental Modification Convention	10/22/85 (accession)
o Stockholm Convention on Persistent Organic Pollutants	20/02/2013 (accession)
o Law of the Sea	8/03/1983 (signed)
Equal Remuneration Convention, 1951 (No. 100)	In Force (ratified 1969)
Abolition of Forced Labour Convention, 1957 (No. 105)	In Force (ratified 1963)
Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	In Force (ratified 1969)
Minimum Age Convention, 1973 (No. 138) Minimum age specified: 15 years	In Force (ratified 2010)
Worst Forms of Child Labour Convention, 1999 (No. 182)	In Force (ratified 2010) 2014: Ministry of Labour and Social Affairs (MoLSA) announced a List of Prohibited Jobs for Child Labourers (Labour Code 41,42)
Night Work (Women) Convention (Revised), 1948 (No. 89)	Abrogated by decision of the International Labour Conference at its 106th Session (2017)
Night Work (Women) Convention, 1919 (No. 4)	Abrogated by decision of the International Labour Conference at its 106th Session (2017)
Equal Remuneration Convention, 1951 (No. 100)	In Force
Underground Work (Women) Convention, 1935 (No. 45)	In Force
Protection of Wages Convention, 1949 (No. 95)	In Force
Weekly Rest (Commerce and Offices) Convention, 1957 (No. 106)	In Force
Dock Work Convention, 1973 (No. 137)	In Force (ratified 1979)
Occupational Cancer Convention, 1974 (No. 139)	In Force
Paid Educational Leave Convention, 1974 (No. 140)	In Force
Human Resources Development Convention, 1975 (No. 142)	In Force (ratified 1979)
Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No.159)	In Force (ratified 2010)

In general, national agencies are not currently in a position to handle the technical complexities and reporting

requirements of international agreements. Project activities are not expected to be in breach of any international agreement to which Afghanistan is a party.

2.6 Relevant Technical Guidelines for COVID-19 Virus

The World Health Organization, World Bank and Ministry of Public Health (MoPH) have issued a number of guidelines to prevent and contain the spread of infections among the population as well as frontline workers. Relevant guidelines as updated from time to time applicable include:

- Technical brief for water and sanitation practitioners amidst outbreak of the COVID-19;
- WHO Guideline “Getting Your Workplace Ready for COVID-19”;
- WHO Interim Guideline Diagnostics, Therapeutics, Vaccine Readiness, and other Health Products for COVID-19 (2020);
- World Bank ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works;
- World Bank Group (WBG) response to COVID-19 Stakeholder Engagement, Information Disclosure and Communication; and
- MoPH Guidelines for COVID-19

3 Identification and Assessment of Potential Environmental and Social Risks, Impacts and Mitigation Measures

3.1 Environmental Risk and Social risks and Mitigation Measures

This section summarizes key environmental and social risks in line with the Project components and sub-components and guided by the harmonized application of the ESF, ESSs, and UNICEF SESSPs.

The project activities are expected to have significant positive social impacts in the education sector in Afghanistan. Considering education has been dependent largely on foreign aid, this short-term, emergency project is essential to safeguard education achievements obtained over the past 20 years and contribute to future nation-building efforts. This project will also ensure that learning continues, in a safe and secure environment for all children and health and safety impacts to teachers, students, support staff and visitors. Table 4 identifies the potential environmental and Social (including labour), Health, and Safety risks associated with project activities and the corresponding mitigation measures.

Table 4: Potential Environmental and Social Risks and Mitigation Measures

Potential Risk	Mitigation Measure
Occupational Health and Safety	
<p>Occupational Health and Safety Risks can occur because of the potentially hazardous work environment. OHS risks may include:</p> <ul style="list-style-type: none"> • Project workers may be exposed to COVID-19 • Work-related accidents and injuries may increase during civil (rehabilitation) works. • Road safety hazards, traffic accidents • Exposure to heavy objects, heavy machinery and equipment, falling objects • Exposure to noise and dust, and exposure to electrical hazards from the use of tools • Exposure to chemicals such as paints, solvents, lubricants, and fuels • Lifting of heavy loads • Welding hazards (fumes, burns) 	<ul style="list-style-type: none"> • Ensure implementation of OHS measures detailed in Annex 3 and address related grievance as detailed in the simplified LMP (Annex 2) • Incorporate by reference the relevant aspects of the ESCP, including, inter alia, the ESMF, into the ESHS (Annex 3) specifications of the procurement documents with implementing partners and contractors. Such requirements will be extended by UNICEF’s contractors/service providers (implementing partners) to all subcontractors¹¹. • Require service providers (implementing partners)/contractors to provide quarterly monitoring reports to UNICEF on ESHS performance in accordance with the ESHS metrics specified in the respective procurement documents. • Provide laminated signs of relevant safe working procedures in a visible area on work sites, in English and local language as required, including infection prevention • Provide training on OHS and COVID-19 Infection Prevention and Control Protocols

¹¹ Note standard UNICEF contracting language will not be amended, but ESHS requirements will be referenced in Project Documents or Contracting Documents (e.g., through TOR).

<p>and radiation)</p>	<ul style="list-style-type: none"> • Ensure Construction/rehabilitation sites have protective measures (barriers, fencing) • Erect removable barriers in high-risk areas • Put in place warning signs, and allow only authorized persons access to working area • Carry out the medical follow-up of the workers (such as emergency medical treatment on site, transportation to nearby hospitals) and appropriate medical cover in line with national laws. • Require all vehicle drivers to have appropriate licenses • Equip workers with hard helmets, safety boots and protective gloves and/or PPE equipment as needed • Provide First aid equipment and facilities in accordance with the Labour Law • Require at least one supervisory staff trained in safety procedures to be present at all times when rehabilitation work is in progress • Ensure adequate provision of hygiene facilities (toilets, hand-washing basins), resting areas etc. separated by gender as needed and with distancing guidelines in place • Require all workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken, and reported to UNICEF and the World Bank in compliance with the terms set in the ESCP
<p>Labour and Working conditions</p>	
<p>Risks related to labour and working conditions may include:</p> <ul style="list-style-type: none"> • unfair/discriminatory recruitment practices (e.g., against women) • recruitment of under aged persons (child labour) • noncompliance with national labour laws 	<ul style="list-style-type: none"> • Implement the simplified LMP set and agreed for the project (Annex 2) • Establish, maintain, and operate a grievance mechanism for Project workers, as described in the simplified LMP • Incorporate by reference the relevant aspects of the ESCP, including, inter alia, the ESMF, into the ESHS (Annex 3)

<ul style="list-style-type: none"> • low capacity to manage E&S risks • Exposure of workers to COVID-19 	<p>specifications of the procurement documents with implementing partners and contractors. Such requirements will be extended by UNICEF's contractors/service providers (implementing partners) to all subcontractors.</p> <ul style="list-style-type: none"> • Ensure the existence of contractual requirements on prevention of child labour, minimum age of 18 and age verification protocol for each implementing entities • Implement capacity building plans for implementing partners and contractors to mitigate against the risks of low capacity among implementing partners and contractors to manage E&S risks. • Implement relevant WHO COVID-19 and MOPH Guidelines and adopt work methods that minimizes overcrowding on site and within the work environment • Site-specific ESMPs will include measures to minimize and mitigate labour risks
<p>Gender Inequality, Gender-based Violence (GBV)/ Sexual Exploitation and Abuse (SEA) /Sexual Harassment (SH)</p>	
<p>SH includes unwelcome sexual advances, requests for sexual favours, and other unwanted verbal or physical conduct of a sexual nature in the workplace, between personnel/staff working on the project. Both women and men can experience SH. Workplace related SEA can affect Women, girls, boys, and men and includes any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. Sexual abuse includes actual or attempted physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. In the context of World Bank supported projects, project beneficiaries or members of project affected communities may experience SEA. GBV/SEA/SH risks may include:</p> <ul style="list-style-type: none"> • Female clients could face demands for favors in exchange for receiving required services for themselves or 	<ul style="list-style-type: none"> • Train all project workers (including community and teachers) on GBV/SEA/SH. • Require implementing partners and all their staff as well as teachers contracted to perform activities for the project to sign a Code of Conduct • Conduct real-time monitoring by UNICEF and Third-Party Monitoring of the GBV/SEA/SH Action Plan • Ensure availability of a functional grievance redressal mechanism which can be used as reporting channel with specific referral pathways for GBV/SEA/SH. A workers' GRM will allow project workers to report any instances of sexual harassment and abuse on the job, while a beneficiaries' GRM will allow project participants to report instances of SEA or GBV perpetrated by project workers • Ensure sufficient GBV service providers are in place to refer SEA/SH cases including focal persons in school and communities

<p>their children</p> <ul style="list-style-type: none"> • Female staff of contractors could be subjected to sexual harassment by their colleagues • Female staff can be required to take on gendered roles within their team that are outside of their contracted scope of work, and face threat of reduction in pay or loss of employment if they do not perform these extra tasks or roles 	<ul style="list-style-type: none"> • Ensure safety measures are in place to protect GBV service providers and GBV focal points. Sufficient support (psychosocial and mental health care) including self-care mechanisms • Awareness raising among community members and in schools on GBV/SEA/SH risks and presence of GRM.
<p>Resource efficiency, Pollution and Waste Management</p>	
<p>Environmental risks associated with resource efficiency and material supply; construction related solid wastes, wastewater, noise, dust and emission management; hazardous materials management etc. may include:</p> <ul style="list-style-type: none"> • Dust generation during construction equipment and materials loading and unloading, and working material mixing • Increased levels of noise and vibration due to vehicles movement and construction machineries • Air pollution due to emissions from construction vehicles and machinery • Poor management of liquid wastes, leading to soil or groundwater pollution • Poor disposal of construction debris and waste materials • Ground water pollution from pit latrines • Improper handling and disposal of hazardous waste • Ground water depletion • Soil erosion during the construction • Inefficient use of resources, water, construction materials and energy 	<p>Assess the environmental and social risks and impacts of proposed Project activities, in accordance with ESSs, the Environmental, Health and Safety Guidelines (EHSGs) including its OHS component</p> <ul style="list-style-type: none"> • Prepare ESMPs capturing resource minimization and mitigation measures of adverse impacts on material sources • Use well-maintained equipment • Spray water for dust control • Use operational noise muffler • Limit noisy activities to normal daylight hours • Limit vehicle speed at critical locations • Properly maintain construction machinery to minimize exhaust emissions of CO, suspended particulates and fumes • Remove and recycle liquid waste • Properly dispose of solid waste at designated permitted sites • Ground water quality testing at source development and regular intervals during both the construction and operational phase • Borehole will be at safe distance from the pit latrines. In addition, pit latrines will be lined which also reduce the potential contamination • Pumping test will be carried out to ensure the safe yield of the borehole is used to avoid depletion of the aquifer • Water pump, external plumbing system and water reservoir tanks shall be properly maintained to avoid leakages and wastage of water. • Borehole Yield taken into consideration when

	<p>determining pumping mechanism</p> <ul style="list-style-type: none"> • Make sure the water source is used only for intended purpose and not for agricultural purpose and as per designed parameters. • Ensure re-use of excavated soils as backfill material otherwise appropriately disposal of this material to ensure it is not an eyesore to the community nor an environmental issue. Some of the drilled materials will be used in the borehole construction by back filling the annular space.
<p>Community Health and Safety</p>	
<p>Community Health and Safety risks may include:</p> <ul style="list-style-type: none"> • Risk of accidents or infection including COVID-19 within schools • Inadequate hygiene practices and behavior by project works • Poor design of facilities • Potential structural failure • Access to building by persons with disabilities • Spillage and contamination from black water • Odor emanating from poorly managed WASH facilities 	<ul style="list-style-type: none"> • Ensure that targeted schools apply safety standards to avoid infection, provide the necessary hygiene supplies, use related guidelines and procedures including those prepared by WHO and the WBG EHS • • Ensure availability of a grievance redress mechanism, 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. • Provide awareness to employees, and the community on the importance of personal hygiene and cleanliness of the surrounding environment • The designs of boundary walls and WASH facilities have been reviewed by UNICEF engineers and technical teams, and approved by government counterpart • Pre-construction kick-off meeting are held with contractors to ensure they understand the need to strictly adhere to the designs and specifications of the structures • Resident supervising engineers and periodic monitoring from project managers to ensure construction conforms to accepted standards • Ramps, parapets, larger doors and larger WC rooms will be built to ensure inclusive access • Safety procedures will be enforced to minimize black water spillage. Ensure contaminated materials are disposed safely. • Construct a soak pit to dispose of wastewater from the

	<p>handwashing facilities to avoid contamination or use the wastewater for gardening.</p> <ul style="list-style-type: none"> • Ensure that the borehole is located within or more than 20 meters distance from potential source of contamination, e.g., latrine. • Ensure design that minimize odor and train beneficiaries on hygienic maintenance of WASH facilities
Security	
<p>The security and conflict situation remains fragile in Afghanistan with Islamic State – Khorasan (ISK) and other military groups active. The ongoing conflict creates a challenging security situation. Security risks may include:</p> <ul style="list-style-type: none"> • Threats to the personal safety of the workers due to fighting, airstrikes, shelling, and landmines, complex attacks. • Threat of physical violence for project workers • Detention including arrest or kidnapping during the course of, or as a result of, project-related work • Road traffic accidents 	<ul style="list-style-type: none"> • Implement project SMP in line with the United Nations Security Management Systems (UNSMS) policies and processes, including the Saving Lives Together framework (SLT), for UNICEF personnel and premises. • Identify security threats to the project and establishment of clear channels of communication to communicate changes in threat levels between the various parties involved in project implementation • Follow deconfliction procedures before any field mission for direct staff • Ensure updated and real-time mapping of roads and potentially affected areas • Ensure that all project workers are duly trained on the security clearances from relevant authorities for all contracted work • Suspend project activities in areas with active conflict or where political and governance risks cannot be effectively managed • Through the stakeholder engagement plan, ensure that authorities and influencers at all levels are adequately engaged and secure buy-in for the project to mitigate against resistance from local level authorities • Require UNICEF personnel to comply with UNICEF’s vehicle fleet and road safety/management policies, procedures, and guidelines • Train UNICEF staff and require contractors and partners to provide adequate training to its staff, on safety and security considerations tailored to the local context in

	Afghanistan, including on conflict sensitive communication, cultural awareness, implementation, and risk management
Vulnerable groups	
<p>The central social risk is the limitations and challenges marginalized and vulnerable social groups may face in accessing education services. Specifically, reaching traditionally excluded groups, remotely located communities, and internally displaced people may be challenging in the present vulnerable country context. There are also structural barriers for these disadvantaged groups to access education/schools like security and mobility concerns, especially for girls</p>	<ul style="list-style-type: none"> • Implement the SEP and ensure regular updates of the SEP (to ensure that vulnerable groups have equal access to the project benefits). • Operationalize UNICEF’s equity policy as far as possible, based on evidence, to ensure equitable distribution of benefits to targeted beneficiaries, including establishment of community-based education and block grants to institutions offering girls education. • Ensure availability of a grievance redress mechanism, 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 • Design interventions, operational modalities, and funding flows to avoid elite capture of resources and ensure that as much of the funds as possible reach the intended beneficiaries, including vulnerable groups
Natural Disasters	
<p>Afghanistan is prone to natural disasters which may impact project activities implementation, staff ability to work, and infrastructure and project resources, for example:</p> <ul style="list-style-type: none"> • Heat waves • Severe winter • Floods • Cyclones • Earthquakes and landslides 	<ul style="list-style-type: none"> • Monitor the weather conditions and develop emergency response plans to ensure the safety of direct and contracted staff. • Establish communication mechanisms between offices and entities to share information as situations evolve • Adapted working hours at sites to avoid work during the heavy weather period • Provide flexible scheduling and alternative work modalities • Use as much as possible local workers to provide the services, to avoid workers traveling long distances

3.2 Security Management

Possible occurrence of conflict (including armed conflict) and/or terrorist attacks on schools/project workers is also an important contextual risk that may affect safety of the project actors. UNICEF has developed a Security Management Plan whose implementation will help mitigate against this risk. The overall security management approach under the EERA will operate within the parameters of the United Nations Security Management System

(UNSMS) to which both UNICEF and World Bank are parties to, including the Saving Life Together framework (SLT) which is a chapter of the UNSMS Security Policy Manual. The UNSMS comprises a variety of instruments, including policies, guidelines, manuals, handbooks, aide memoires and communiqués. All these documents are maintained on the United Nations Security Information Network (UNSMIN).

The evolving and complex political, socio-economic environment presents multiple risks, both direct and indirect, to project staff, contractors, teachers and schools as well as local partners. UNICEF has developed a project SMP to help prevent and mitigate the risks. The SMP utilizes the UNSMS, to which both UNICEF and World Bank are party to, for the overall security management approach. The SPM has five components:

1. UNSMS.
2. Inter-Agency Security Management Network (IASMN) Saving Lives Together Framework (SLT).
3. Security Incident Reporting.
4. Service Providers/Contractors.
5. Road Safety.

UNSMS: The UNSMS comprises a variety of instruments, including policies, guidelines, manuals, handbooks, aide memoires and communiqués. Relevant guiding documents are maintained on the United Nations Security Information Network (UNSMIN)⁴

Saving Lives Together Framework (SLT): The SLT is a series of recommendations aimed at enhancing security collaboration between the United Nations (UN), and international NGOs and/or international organizations (known as “SLT partner organizations”). The objective of SLT “is to enhance the ability of partner organizations to make informed decisions, manage risk and implement effective security arrangements to enable delivery of assistance and improve the safety and security of personnel and operations.” There are two levels of collaboration within the SLT – “regular” and “enhanced.” The UNICEF implementation of the SLT under this project, when applicable, will follow the “enhanced” level of collaboration with regards to security plans and information management to bolster security coordination arrangements, information sharing and operational / logistics arrangements with any international NGO implementing partners.

Security Incident reporting: The Security Incident Reporting process is supported by UNICEF regular monitoring of the security situation on the ground, including monitoring of the security situation using data received from multiple sources, including UNDSS, UNICEF service providers, partners, media, etc. UNICEF will notify World Bank within 48 hours after learning of and confirming the incident or accident. A detailed report (using an agreed template) of the incident shall be provided within thirty (30) days of making the initial report of the security incident.

Service Providers/contractors: UNICEF Implementing Partners and Contractors are responsible for the security of its personnel, premises, equipment, and activities when implementing UNICEF supported programmes. These responsibilities are outlined in the clauses of the contracts entered between UNICEF and these contractors and derive from their fundamental duty of care as employers and as independent legal entities. The contractors will report to UNICEF on all matters related to program implementation including security incidents that negatively affect delivery or impact personnel according to the SOPs in place.

Road Safety: UNICEF’s vehicle fleet and road safety management policies, procedures and guidelines will apply to UNICEF staff as they conduct their regular monitoring visits to schools. Implementing Partners and Contractors

will be responsible for the engagement and management of personnel, ensuring compliance with road safety and convoy procedures.

3.3 GBV/SEA/SH Action Plan

The SEA/SH risk has been rated “high” for this project contributing to further increased social risks. To mitigate, UNICEF will implement UNICEF a comprehensive SEA/SH Prevention and Response Action Plan, as well as relevant UN Policies regarding sexual exploitation and abuse. UNICEF has prepared a detailed GBV/SEA/SH action plan to prevent and mitigate the substantial SEA and SH risks. GBV is a complex issue requiring multisectoral collaboration for it to be tackled effectively. The SEA/SH action plan has specific and timebound actions to mitigate the SEA/SH risks; it covers Codes of Conduct, in-depth trainings and sensitization in CBE classes as a pilot, GBV-responsive GRM where referrals will be made to pre-identified GBV service providers. All implementing NGOs and contractors will follow UN security protocols to ensure staff and workers’ safety. A functional Grievance Redress Mechanism (GRM) including special protocol for reporting SEA/SH related complaints will be in place throughout the project cycle.

UNICEF collaborates with other UN agencies (mainly UNFPA, WHO) and other key stakeholders involved in GBV work. UNICEF will work closely with WHO for the implementation of the action plan and continue to work with UNFPA and other partners within the GBV sub-cluster to ensure consistency and coordination and will leverage its coordination role in the health sector to further advance GBV risk mitigation and response. The prepared GBV action plan contains specific activities under the following pillars:

- GBV/SEA/SH risk mitigation covering development of school minimum standards checklist, GBV/SEA/SH safety audit, training of all workers involved in project and their implementation partners as well as development and roll out of code of conduct for contracted workers
- Case Management for GBV/SEA/SH survivors including establishing and or strengthen existing referral mechanisms through focal points at the regional level and strengthen the network of GBV/SEA/SH at all levels down to schools. Community case management structures such as women and girls’ safe spaces run by UNICEF will be strengthened to be the main entry points for confidential referrals of GBV/SEA/SH for case management. While secondary level referral centres will be supported to address all the referrals. Training materials will be developed and roll out training to equip all teachers and project workers and community members to provide first line response and conduct safe and confidential referrals.
- Awareness raising on GBV/SEA/SH risk mitigation and information on available GBV/SEA/SH services targeting teachers, students and project affected communities will be a key component for ensuring teachers and community sensitization in a safe manner. The awareness will be through IEC materials that would be developed under this project Including pamphlets with key messages on GBV/SEA/SH, these messages will be developed jointly with TWG and SBC unit of UNICEF and GBV sub-cluster. Use of innovations to information dissemination will be key looking at the context and sensitivity around GBV/SEA/SH, UNICEF will continue to make use of U-report chat box and FAQs mechanisms and bulk SMS for mass sensitization targeting teachers and surrounding communities. Use of these Innovating channels have already proved to be safe and effective on raising GBV/SEA/SH awareness and linking affected

population to service providers within the current context UNICEF will also use women and girls safe spaces already existing as platform to enhance sensitization around GBV/SEA/SH to affected population.

- Grievance handling and reporting mechanism which includes specific actions for integration of safe and accessible channels of reporting GBV/SEA/SH related grievances through the relevant GRM platforms.
- Coordination and Monitoring includes establishing SEA/SH technical TWG at National and provincial level and ensure regular meetings of key stakeholders for effective coordination and monitoring.

4 Procedures to Identify and Assess Potential Environmental and Social Risks and Impacts for Subprojects

This section sets out in detail the procedures to be followed in addressing the environmental and social risks and impacts of the project and its components.

4.1 Exclusion List

The first step in addressing a component/sub-component's environmental and social risks and impacts is for the ESS Specialist to exclude as **ineligible for UNICEF all** components/subprojects that include any of the following attributes:

- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.
- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Production or trade in weapons and munitions.
- Gambling, casinos and equivalent enterprises.
- Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- Production or trade in radioactive materials.
- Production or trade in or use of un-bonded asbestos fibers.
- Production or trade in wood or other forestry products from unmanaged forests.
- Production or trade in products containing PCBs.
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals.
- Production or trade in pharmaceuticals subject to international phase outs or bans.
- Production or trade in pesticides / herbicides subject to international phase outs or bans
- Production or trade in ozone depleting substances subject to international phase out.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such people.
- Power plant.
- Large-scale transport infrastructure such as highways, expressways, urban metro-systems, railways, and ports.
- Investments in extractive industries; commercial logging.
- Dams, or projects involving allocation or conveyance of water, including inter-basin water transfers or activities resulting in significant changes to water quality or availability.
- Activities that would significantly convert natural habitats or significantly alter potentially important biodiversity and/or cultural resource areas, and
- Activities that would require the relocation of residential households and/or significant involuntary land acquisition,
- Activities that would require the acquisition of private land,
- Activities in disputed areas.

4.2 Screening

E&S screening is the next step to understand the potential risks and impacts of the subproject/activity. The

template for E&S screening to be applied for all activities is included as Annex 1 of this ESMF. The E&S Screening template will be reviewed and updated as needed during the project implementation.

The screening results will allow to filter out the activities that are not eligible or those in the exclusion list (see Section 4.1) and classify eligible activities on the basis of predictable risks and impacts. All activities that are not sustainable due to their location or because they represent risks and impacts that are neither avoidable, mitigable nor compensable will not be financed by the project.

The environmental and social risks and impacts identified through the E&S screening will then determine the need for the implementation of appropriate E&S mitigation measures, for example in the form of preparation and implementation of subproject specific ESMPs (See the generic ESMP in Annex 4)

Within one week of receiving a draft proposal from UNICEF' technical staff, the ESS Specialist will prepare, sign, and pass on to the Project Manager, sub-component specific screening form (Template in Annex 1), indicating:

- The proposed environmental and social risk rating (High, Substantial, Moderate or Low), with justifications,
- The proposed environmental and social risk management instruments to be prepared by UNICEF.

4.3 Environmental and Social Risk Management Instruments

No ESIA is envisaged as environmental risks are assessed as moderate. Construction and rehabilitation activities are within the existing footprint of the school. The project will use a generic ESMP template in this ESMF to guide the preparation site-specific ESMPs for sub-projects, which will be prepared by UNICEF. The ESMP identifies prevention, minimization, mitigation, and compensation measures to be applied to subprojects as required. The generic ESMP can be adapted based on site conditions. The mitigation table serves as a reference on potential risks and impacts, mitigation measures and indicators or outcomes that can be planned and implemented throughout the project. The risks and impacts, mitigation measures and monitoring indicators are presented according to the relevant ESSs.

4.4 Incorporating ESHS requirements in contracts

UNICEF or its Implementing Partner will ensure that:

- Requests for Proposals reference the ESHS requirements in Annex 3 and attach this ESMF.
- Bidders submit a preliminary environmental and social plan as part of their bids, describing the principles and methodology they will use to address environmental, social, health and safety issues under the contract, and will include all costs associated with managing environmental and social issues in their bids.
- The quality of the preliminary environmental and social plan, the bidders' past environmental and social performance, and their ability to manage environmental and social issues will be considered in the selection of contractors.
- Environmental and Social Clauses are inserted into bidding documents and Works Contracts

The selected contractors will use the site-specific ESMP for each project site as may be required.

4.5 Consultation and Disclosure Requirements

For each subproject, the ESS specialists will engage with affected communities, including beneficiary communities, through the process of stakeholder engagement described in the Project Stakeholder Engagement

Plan (SEP). UNICEF will initiate consultations with individuals and communities that might be affected by the subproject, from the start of the project. The purpose of the consultations will be to: (i) inform them about the activities to be undertaken, possible impacts, and (ii) document and address their concerns. Consultation summaries should be included in safeguard instruments, including who was consulted, where and when, what concerns were expressed, and how these concerns were addressed. The records of consultations, including signed minutes of consultative meetings, will be kept in the Project Office. In addition, subprojects will regularly consult with project affected persons and communities throughout subproject implementation, as indicated in the Project's Stakeholder Engagement Plan. Furthermore, all stakeholders participating in the consultation will be informed on the GRM and where/how complaints can be made.

The consultation process will take in account the sociocultural context of Afghanistan. Consultations can take the form of focus groups, discussions with elders/community leaders, or interviews. Separate consultations will be done for women in order to ensure that any special concerns and needs are taken into account during the preparation of the safeguard instruments. In light of the fragility, conflict, and violence (FCV) context, the ESS Specialist of the concerned will ensure that project affected persons are not exposed to risks as part of their participation in subproject consultations, for example by avoiding large meetings, and not disclosing personal information/photos.

4.6 Grievance Redress Mechanism (GRM)

UNICEF will apply the Project Grievance Mechanism detailed in Section 6 of the Project Stakeholder Engagement Plan, to all subprojects. Each ESMP will include a subproject specific Grievance Mechanism, with procedures relevant to its specific context.

Intervention related grievances can be brought up by affected people in case of: (i) non-fulfillment of contracts or agreements; (ii) compensation entitlements; (iii) types and levels of compensation; (iv) disputes related to the destruction of assets or livelihoods; disputes in receiving project services (v) issues related to GBV or (vi) disturbances caused by construction activities, such as noise, vibration, dust or smell.

The GM will be gender- and age-inclusive and responsive and address potential access barriers to women, the elderly, the disabled, youth and other potentially marginalized groups as appropriate to the Project. The GM will not impede access to judicial or administrative remedies as may be relevant or applicable and will be readily accessible to all stakeholders at no cost and without retribution.

Information about the Grievance Mechanism and how to make a complaint and/or grievance must be communicated during the stakeholder engagement process and placed at prominent places for the information of the key stakeholders.

All complaints and/or grievances regarding social and environmental issues can be received by calls through a toll-free call center. All received grievances are registered in the Grievance module of the HOPE MIS within the appropriate grievance type, to ease the analysis and redressal. The Responsible Party maintains a register of inquiries, complaints, and/or grievances during the payment cycles, including grievances from workers. The following information will be recorded:

- time, date, and nature of inquiry, concern, complaints and/or grievances.
- name contact address and contact number.
- response and review undertaken as a result of the inquiry, concern, complaints and/or grievances; and actions taken and name of the person taking action.

The GRM will also handles anonymous complaints, though the extent to which action can be taken to address

them will depend on the information the caller is willing to provide. Where the complainant is not satisfied with the resolution, grievances can also be escalated as provided by the GRM.

5 Institutional Arrangements, Responsibilities and Capacity Building

5.1 General Management Structure and Responsibilities

5.1.1 UNICEF

All project components will be implemented by UNICEF, either directly or through agreements with implementing partners and/or contractors.

As such, UNICEF will:

- Take responsibility for project implementation, either directly or through oversight of implementing partners;
- Monitor the project targets and results in coordination with the local partners;
- Handle relevant procurement, financial management, and disbursement management including the preparation of withdrawal applications under the project; and
- Ensure compliance with all reporting requirements as per the Project Financing Agreement.

UNICEF is responsible for the overall implementation of the ESMF, including screening of the sites, preparation of ESMPs and supporting E&S instruments. More specifically UNICEF will ensure that:

- Tender documents and construction contracts include effective and enforceable environmental and social contractual clauses to manage environmental and social risks/impacts.
- The environmental and social performance of contractors will be monitored and reported to meet the Project's environmental and social requirements.

UNICEF has in place dedicated ESS personnel which will include Environmental Specialist, Social Specialist, SEA/SH Specialist shared between the Health and Education projects funded by the World Bank. The Environmental/Social Specialist and the SEA/SH Specialist, supported by project staff, will conduct the management, monitoring and reporting of environmental and social risk management aspects throughout project implementation

5.1.2 UNICEF Implementing Partners

UNICEF will contract implementing partners (mainly international or national NGOs) to establish and run CBE classes while rehabilitation/construction works will be implemented through NGO partners/ contractors. Through their contracts and scope of work, SPs and Contractors will be responsible for the following within the ESMF:

- Implement / comply with all relevant environmental and social requirements including ESMPs as defined in the contracting documents
- Monitor the implementation of the ESMF and specifically the ESMPs in schools and by sub-contractors (if relevant) Implement and manage a GRM
- Report on implementation of the implemented components of the ESMF and the ESMP including grievances, accidents, and incidents

5.1.3 Third Party Monitoring Organizations

Third Party Monitoring Organizations will monitor and provide reports on the implementation of the ESMF and ESMPs based on indicators agreed with UNICEF and World Bank based and timelines.

The World Bank has an existing contract with a Third-Party Monitoring Agent (TPMA) for all ARTF-financed projects. The ARTF-MA will conduct independent monitoring of the project including verification of delivery of the respective goods, works and services and implementation of environmental and social standards.

5.2 Monitoring and Reporting

UNICEF will monitor the overall implementation of ESMPs (See generic ESMP in Annex 4) for this project, as well as the environmental and social performance of its contractors as part of its overall Project monitoring, as defined in the HACT framework. The monitoring of project implementation will be done through UNICEF's internal mechanism as well as through two TMPs, as part of UNICEF's TPM monitoring of both the Education and WASH programmes.

Internal monitoring with focus on three types of risk assurance activities:

- Programmatic visits are conducted to obtain evidence on the status of program implementation and to review progress towards achievement of planned results.
- Spot-checks are conducted to review implementing partner's financial records for the project in question, which enables UNICEF to obtain reasonable assurance that the expenditure amounts reported by implementation partners are accurate.
- Internal Audits are a systematic and independent examination of an implementing partner's data, statements, records, operations, and performance meant to determine whether the funds transferred

Monitoring will cover:

- Timely preparation of environmental and social screening forms
- Timely preparation and clearance of subproject ESAs and ESMPs, as needed
- Management of prior review requirements of the World Bank
- Monitoring of ESMP implementation, including monitoring of mitigation measures and monitoring of contractors environmental and social performance
- Training of project staff, Implementing partner, and contractors

UNICEF will primarily rely on quarterly reports from its Implementing Partners to monitor the implementation ESMPs and the environmental and social performance of contractors.

UNICEF will also contract independent TPM service providers to monitor components 1 and 2.

5.3 Capacity Building and Training

UNICEF and its implementing partners have the responsibility for ensuring systems are in place so that relevant employees, contractors and other workers are aware of the environmental and social requirements for project implementation, including the ESMF. The following capacity building and training programmes will be in place, as part of capacity building activities of UNICEF staff, extenders and its implementing partners.

- Capacity building of UNICEF (led by UNICEF): To impart awareness on essential regulatory and other requirements and elements of the ESMF, to help understand the importance of social and environmental management from design stage through implementation.
- Training and awareness of service provider personnel (led by the Implementing Partners and overseen by UNICEF): A training on relevant ESMF requirements, including social, health and safety requirements, will be embedded in the training of all service provider personnel conducted prior to the project engagement.
- Capacity building and awareness of service providers (led by UNICEF) on PSEA risk mitigation, prevention, including capacity on safe access to SEA/SH Reporting mechanisms

The design of training modules shall take into account differing levels of responsibility, ability, language skills, literacy and risk exposure.

The UNICEF and its implementing partners shall ensure that persons under their control performing tasks related to environmental and social risk management are competent on the basis of appropriate education, training or experience, and shall retain associated records. Table 5 summarizes the capacity building plan to support the implementation of the ESMF

Table 5: Capacity building plan

Type of Training	Training Contents	Participants	Timeframe	Responsible Actor	Estimated Cost (in USD)
Community Mobilization/ Risk Communication	<ul style="list-style-type: none"> • Importance of community participation and mobilization to enhance project ownership, transparency and accountability • Risk Communication • Community Mobilization Strategies • Concept of Vulnerability • Community consultation and awareness raising • GBV/SEA/SH • Violence Against Children (Children SEA/SH) • Stakeholder engagement • Social inclusion and diversity 	CDC members, tribal and religious leaders, Principals, Media	During mobilization	Implementing partner	Included in Stakeholder engagement budget
Grievance Redress/Sexual Exploitation, Abuse and Harassment	<ul style="list-style-type: none"> • Dispute resolution management and grievance redress • Trust and Consensus Building • GBV/SEA/SH • Violence Against Children (Children SEA/SH) • Handling GBV related complaints – including cases of VAC • Project Grievance Redress Systems • Code of conduct to prevent GBV/SEA/SH 	CDC Members, School Management Shuras, Tribal and Religious Leaders and Community based Organizations, Teachers, Project consultants, UNICEF staff	Throughout project implementation	UNICEF/ Implementing Partner	Included in GBV action plan
Training on guidelines, and procedures particularly on ESMP implementation,	<ul style="list-style-type: none"> • E&S Screening of subprojects • Introduction to World Bank's ESF • Responsibilities of Consultants and Contractors in implementing ESMPs • Toolbox meeting on OHS issues including the use of PPEs • Community health and safety (including emergency prevention and preparedness, response arrangements to emergency) • Security risk management procedures • Grievance mechanisms for workers and communities 	Contractors Implementing Partner Principals, Project Consultants, UNICEF staff	Before the commencement of sub-project activities	UNICEF/ Implementing Partners	350,000.00

5.4 ESMF Budget

The ESMF budget is estimated at a total of US\$900,000. The budget is presented in the Table 6.

Table 6: ESMF implementation budget

No	Activity	Costs USD
1	Training cost	350,000
2	Translation of ESCP, SEP, ESMF, ESMPs into Dari and Pashto and other local languages	50,000
3	Preparation of Environmental and Social Instruments	50,000
4	Contribute to office wide GRM	300,000
5	ESMF implementation monitoring	150,000
6	Total	900,000

Annex 1. Template for Component/subcomponent Screening

Screening Form for Potential Environmental and Social Issues

UNICEF will use this form to screen for the potential environmental and social risks and impacts of a proposed sub-component. The form will allow the UNICEF to: (i) identify the relevant Environmental and Social Standards (ESS); (ii) establishment an appropriate Environmental and Social risk for the sub-component, and (iii) specify the type of environmental and social assessment required, including specific instruments/plans.

The Screening Form is not a substitute for project-specific environmental and social assessments or specific mitigation plans

Component Name	
Component Location	
Implementing Partner (CSO/NGO/INGO, governmental partners, private sector)	
Risk level (low, moderate, substantial, or high)	
Date of the field visit	
Consultation Summary	
Observations/Comments	
Signature of responsible ESS Specialist	
Approved by management: Dep Rep/Section Chief	
Date	

Exclusion list:

The first step in addressing a component/sub-component's environmental and social risks and impacts is for the ESS Specialist to exclude as **ineligible for UNICEF all** components/subprojects that include any of the following attributes:

- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.
- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Production or trade in weapons and munitions.
- Gambling, casinos and equivalent enterprises.
- Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- Production or trade in radioactive materials.
- Production or trade in or use of un-bonded asbestos fibers.
- Production or trade in wood or other forestry products from unmanaged forests.
- Production or trade in products containing PCBs.
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or

- commercial scale usage of hazardous chemicals.
- Production or trade in pharmaceuticals subject to international phase outs or bans.
- Production or trade in pesticides / herbicides subject to international phase outs or bans
- Production or trade in ozone depleting substances subject to international phase out.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such people.
- Power plants,
- Large-scale transport infrastructure such as highways, expressways, urban metro-systems, railways, and ports,
- Investments in extractive industries; commercial logging,
- Dams, or projects involving allocation or conveyance of water, including inter-basin water transfers or activities resulting in significant changes to water quality or availability,
- Activities that would significantly convert natural habitats or significantly alter potentially important biodiversity and/or cultural resource areas, and
- Activities that would require the relocation of residential households and/or significant involuntary land acquisition,
- Activities that would require the acquisition of private land,
- Activities in disputed areas.

Screening Questionnaire

1. Description of Sub Project (including Nature and Duration of Sub-Project)

2. Sub Project Activities

3. Sub Project Work force (including Type and Number)

4. Machinery and Equipment that will be used for the Subproject (Including Type and Estimated Number)

5. Location of Sub Project

6. Land take:

----- acres

7. Land Use of the Area for the Sub-Project

- | | | | | | |
|----------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|
| <i>Agriculture</i> | <input type="radio"/> | <i>Residential</i> | <input type="radio"/> | <i>Civic</i> | <input type="radio"/> |
| <i>Existing road</i> | <input type="radio"/> | <i>Reservation</i> | <input type="radio"/> | <i>Park/Recreation</i> | <input type="radio"/> |
| <i>Industrial</i> | <input type="radio"/> | <i>Other (specify)</i> | <input type="radio"/> | | |

Comments:

8. Site Description

9. Land Cover and Topography

i. *Land cover of the site consists of (completely or partly or noticeable) of:*

- | | | | | | |
|-------------------|-----------------------|------------------------------|-----------------------|------------------------------|-----------------------|
| <i>Vegetation</i> | <input type="radio"/> | <i>Sparse vegetation</i> | <input type="radio"/> | <i>Physical structure(s)</i> | <input type="radio"/> |
| <i>Floodplain</i> | <input type="radio"/> | <i>Agriculture (animals)</i> | <input type="radio"/> | <i>Cultural resource</i> | <input type="radio"/> |
| <i>Water</i> | <input type="radio"/> | <i>Agriculture (crops)</i> | <input type="radio"/> | <i>Other specify</i> | <input type="radio"/> |

13. Environmental and Social Impacts/Risks

i. Positive Impacts/Risks

ii. Negative Impacts/Risks

Air Quality

Would the proposed Sub-Project?

i. *Emit during construction (Tick as Appropriate)*

Dust Smoke VOCs

ii. *Expose workers or the public to substantial emissions?* Yes No

iii. *Result in cumulatively increased emissions in the area?* Yes No

iv. *Create objectionable odour affecting people?* Yes No

Comments:

Biological Resources

Would the proposed Sub-Project?

i. *Have adverse effect on any reserved/protected area?* Yes No

ii. *Have adverse effect on wetland areas through removal, filling, hydrological interruption or other means?* Yes No

iii. *Interfere substantially with the movement of any wildlife species or organisms?*

Yes No

iv. Be located within 100 m from an Environmentally Sensitive Area (natural habitat watershed, etc.)?

Yes No

Comments

Cultural Resources

Would the proposed Sub-Project?

i. Disturb any burial grounds or cemeteries? Yes No

ii. Cause significant adverse effect on any archaeological or historic site?
Yes No

iii. Alter the existing visual character of the area and surroundings, including trees and rocks outcrops?
Yes No

Comments:

Water Quality and Hydrology

i. Distance from the nearest water body or drainage channel (minimum distance measured from the edge of the proposed site to the bank of the water body or drain).
More than 100 metres 100 meters Less than 100 meters

Would the proposed Sub-Project?

ii. Will the sub project involve the use of water?
Yes No

iii. Indicate Source of water for the project

iv. *Generate and discharge the following during construction:*

- | | | | |
|--|-----------------------|---------------------------------------|-----------------------|
| <i>Liquid waste</i> | <input type="radio"/> | <i>Liquid with oily substance</i> | <input type="radio"/> |
| <i>Liquid with human or animal waste</i> | <input type="radio"/> | <i>Liquid with chemical substance</i> | <input type="radio"/> |
| <i>Liquid with pH outside 6-9 range</i> | <input type="radio"/> | <i>Liquid with odour/smell</i> | <input type="radio"/> |

v. *Lead to changes in the drainage pattern of the area, resulting in erosion or siltation?*

Yes No

vi. *Lead to increase in surface run-off, which could result in flooding on or off-site?*

Yes No

vii. *Increase run-off, which could exceed the capacity of the existing storm water drainage?*

Yes No

Comments

Noise Nuisance

Would the proposed Undertaking:

i. *Generate noise in excess of established permissible noise level?*

Yes No

ii. *Expose persons to excessive vibration and noise?*

Yes No

Comments

Waste Generation

- | | | | | | |
|--|-----------------------|------------|-----------------------|-----------|-----------------------|
| <i>i. Will the Sub Project generate construction waste?</i> | <input type="radio"/> | <i>Yes</i> | <input type="radio"/> | <i>No</i> | <input type="radio"/> |
| <i>ii. Will the Sub Project generate infectious waste?</i> | <input type="radio"/> | <i>Yes</i> | <input type="radio"/> | <i>No</i> | <input type="radio"/> |
| <i>iii. Will the Sub Project generate radioactive waste?</i> | <input type="radio"/> | <i>Yes</i> | <input type="radio"/> | <i>No</i> | <input type="radio"/> |
| <i>iv. Will the Sub Project generate pathological waste?</i> | <input type="radio"/> | <i>Yes</i> | <input type="radio"/> | <i>No</i> | <input type="radio"/> |

Question	Answer		Relevant ESS	Extent of Required Measures
	Yes	No		
Does the subproject involve civil works including new construction, expansion, upgrading or rehabilitation of existing infrastructure?			ESS1	ESMP, SEP
Is there a risk that the selection of the activity location or beneficiaries will lead to community tensions or conflict?			ESS1	SMP, SEP
Is the subproject associated with any external waste management facilities such as a sanitary landfill, incinerator, or wastewater treatment plant?			ESS3	ESMP, SEP
Does the subproject have an adequate system in place (capacity, processes and management) to address waste?			ESS1, ESS3	ESMP
Does the subproject involve the recruitment of workers including direct, contracted, primary supply, and/or community workers?			ESS2	LMP, SEP
Has the subproject included a review of applicable labour national requirements? / ESS 2 non-compliance risks in Afghanistan (child and forced labour)?			ESS2	LPM, ESMP
Will the activity require a larger contractor workforce?			ESS2	LMP, ESMP
Does the subproject have appropriate OHS procedures in place, and an adequate supply of PPE (where necessary)?			ESS2	LMP, ESHS
Does the subproject have a GRM in place, to which all workers have access, designed to respond quickly and effectively?			ESS10	SEP
Does the subproject involve use of security or military personnel during construction and/or operation of school facilities and related activities?			ESS4	ESMP/SEP
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?			ESS10	SEP

Are women likely to participate in decision-making processes in regard to the subproject?			ESS10	SEP
Is there a risk that exclusion of beneficiaries leads to grievances?			ESS10	SEP
Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk?			ESS1/ESS2/ESS4	ESMP, SEP
Will the COVID-19 outbreak hamper proper stakeholder engagement?			ESS4, ESS10	WHO guidance and regulations on Covid-19
Could the project expose more people to natural hazards or make some people more vulnerable to natural hazards?			ESS3	ESMP

Conclusions of the screening:

1. Indicate the proposed environmental and social risk ratings¹² (High, Substantial, Moderate or Low), and provide justifications.
2. Indicate the proposed environmental and social risk management instruments that must be prepared and how they will be implemented (responsibilities, resources, timeline).

12 High Risk subprojects are likely to generate a wide range of significant adverse risks and impacts on human populations or the environment, because of the complex nature of the Project, their large to very large scale, or the sensitivity of the subproject locations. Impacts are likely to be long term, permanent, irreversible, and impossible to avoid entirely due to the nature of the Project

Substantial Risk subprojects are likely to generate some significant adverse risks and impacts on human populations or the environment, because of their large to medium scale. They are not located in a highly sensitive area. Impacts are likely to be mostly temporary, predictable and reversible.

Moderate Risk subprojects have adverse risks and impacts on human populations and/or the environment that are not likely to be significant, because the subproject is not complex or large, do not involve activities that have a high potential for harming people or the environment, and are located away from environmentally or socially sensitive areas.

Low Risk subprojects have potential adverse risks to and impacts on human populations or the environment that are likely to be minimal or negligible. These subprojects do not require further ES assessment following the initial screening.

Annex 2. Simplified Labour Management Procedures

The Labor Management Procedures (LMP) describe the requirements and expectations in terms of compliance, reporting, roles and responsibilities, monitoring and training with respect to labor and working conditions in the project. These procedures apply to all project workers including direct, contracted, and primary supplier workers employed by the project. Government civil servants, such as teachers, working in connection with the project, whether full-time or part-time, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, except for the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety) of ESS2. The LMP sets out the project's approach to meeting national requirement as well as the objectives of UNICEF's Social and Environmental Standards and Procedures and World Bank's Environmental and Social Framework, specifically objectives of World Bank Environmental and Social Standard 2 (Labors and Working Conditions). LMP is applicable, as per ESS2 to the project. The key objectives of the LMP include:

- Promote safety and health at work,
- Promote fair and equitable labor practices for the fair treatment, non-discrimination and equal opportunity of workers engaged under all components of the project
- Safeguard all categories of project workers, including vulnerable workers such as women, workers with disabilities etc.
- Prevent the use of all forms of forced and child labor
- Protect project workers' rights and ensure the management and control of activities that may pose labor-related risks
- Protect project workers with accessible means to raise workplace concerns.

The recruitment and assignments of the workers will be done in an inclusive manner and all conditions of contracts of all types of workers in this project will be undertaken in accordance of this LMP and its objectives as mentioned above.

The LMP assesses potential labor risks and impacts and describes how they will be mitigated. The LMP is a living document and will be reviewed and updated throughout development and implementation of the project.

Overview of Labour use on the Project

Direct Workers

Direct workers include all persons engaged directly by UNICEF to work specifically in relation to the project. They include current and new UNICEF staff members, including consultants, who will be assigned to work on the Project.

The Project will be implemented by UNICEF based on demonstrated capacities from ongoing activities in Afghanistan and global expertise. UNICEF will leverage its in-country capacity, technical expertise, direct experience implementing relevant activities, readiness on the ground to start implementation on approval, and relationships with various stakeholders. The partnership will also allow synergies with other education projects and build on on-going education activities and make a greater impact.

UNICEF is responsible for the overall project implementation and use of funds. It will introduce systems and

procedures to ensure transparency, accountability and proper use of resources provided. UNICEF has a well-equipped team in place that will oversee the day-to-day management of the project, including fiduciary, environmental and social aspects, as well as monitoring and reporting. UNICEF estimates that at least 34 staff across the Education, Afghanistan Programme Management Unit (APMU), Humanitarian cash Operations and Programme Ecosystem (HOPE), WASH and Supply sections will work directly on the project.

UNICEF's staff across the relevant units will contribute indirect support. This includes indirect support from the Education team comprised of 34 staff (e.g., 20 in Kabul and 14 across the field offices). Additional support is provided through the APMU, a unit that includes 35 staff (e.g., with 15 staff based in field offices and 7 in Islamabad) to manage all direct cash payments. All procurement is handled by UNICEF's Supply section comprised 18 staff members across four pillars (e.g., goods, services, construction and logistics). The logistics unit manages the UNICEF controlled warehouses in Kabul and field offices. And UNICEF's WASH section is comprised of 22 staff, including a dedicated WASH in institutions manager, WASH in school officer, and WASH in institutions construction engineer.

Contracted Workers

UNICEF will engage implementing partners, contractors and service providers to implement all the project components. Contracted workers are the persons employed as deemed appropriate by contractors, subcontractors, and other intermediaries. Contractors may also hire casual unskilled laborers from within communities where, for example, construction activities will occur.

Component 1: UNICEF will engage implementing partners to establish and run CBEs. UNICEF will sign partnership agreements with 6-7 INGOs/NGOs.

Component 2: Contractors may engage workers from local communities, as part of the rehabilitation and construction work. In such cases, all workers will be protected and bound by the same labour management procedures applicable to the project as a whole.

Component 3: UNICEF will engage TPM services for the school-based survey, MICS (estimated 94 enumerators for listing and 240 enumerators for survey data collection) and other third-party monitoring processes. With one enumerator per district, the project is estimated to have about 400 enumerators through the TPM service provider.

Primary Suppliers

Throughout the implementation of the project UNICEF will procure services- learning and teaching materials and well as require the provision and transportation of school learning materials under component 2. Contractors the project will also procure construction materials to rehabilitate schools. The numbers of workers engaged through these suppliers is hard to estimate at this point.

Overview of Labour Requirements

World Bank Environment and Social Standard (ESS2): Labour and Working Conditions

This simplified LMP is prepared in line with the requirements of ESS2: Labour and Working Conditions. It ensures a safe, healthy conducive working environment for workers in which working environment is free of forced and child labour as well as other forms of intimidation and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law. The standard also seeks to protect vulnerable workers such as migrant labour.

The requirements of Labour and Working Conditions (ESS2) extends to direct, indirect, community and contracted workers as well as primary supply workers on a Bank financed project.

UNICEF Labour Requirements

This simplified LMP is also prepared in accordance with UNICEF's ESS1: Labour and Working Conditions. In line with the World Bank ESS2, UNICEF's ESS1 promotes safety and health of workers, prevention of the use of child and forced labour, support for workers in disadvantaged or vulnerable situations and compliance with national labour laws and international commitments. As outlined in Annex 2, UNICEF will ensure specific reference to community workers is included in the LMP and that relevant requirements under WB ESS2 and UNICEF ESS1 apply to this group.

National Legislation

The National Labour Law (2007) and the National Labour Policy (2017-2020) provide legal basis for safe and decent working conditions in Afghanistan. The National Labor Law provide guidance around non-discrimination in recruitment (Article. 9), compliance with international conventions (Article. 12), working hours (Article. 30), breaks (Article. 40), non-discrimination in payment (Article. 59) and special provision for female and youth workers (Article. 121,127-130). These further provides occupational health and safety regulations that provide legislation around safety trainings, hygiene rules, protective equipment, and medical treatment when necessary. The law also addresses Work Standards and Regulations (Article. 88) as well as how labor disputes over terms and conditions of employment will be resolved in the public, private and joint sector (Article. 89). The above terms and conditions apply to employees, workers, service workers, contractual workers, including the long-term consultants. However, some of these terms and conditions applies to community workers i.e., prohibition of child labor, prohibition of forced labor, prohibition of discriminations and maximum hours of work. The legislation requirements conform to guidance provided in WB's ESF and ESS2.

Occupational health and safety

Chapter 10 of the National Labor Law "Ensuring Health and Occupational Safety Conditions" from Article 107-119 provide various OHS measures to be applied for ensuring workers health and safety. The Labor Law of Afghanistan further provides OHS legislation around safety trainings, hygiene rules, protective equipment, medical treatment, when necessary, health insurance compensation, reduced standard work weeks for pregnant and nursing mothers and minors.

It further describes those employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring during the work or as a result of the operation of employer's facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment. Apart from the provisions listed above, Labor Law further describes mandatory assurance of health and safety conditions for the employer in Article 108, "The Administration shall be obliged to ensure reservation of health and labor safety, application of safety techniques to prevent work and production related accident, and to provide healthy condition in order to prevent occupational diseases of Employees". Based on the Labor Law the employer shall take appropriate precautions to ensure that the workplace is safe and without risk of injury to the safety and health of workers. Mitigation measure will be adopted to protect the workers present at or in the vicinity of an Implementation Site from all risks which may arise from such site.

Roles and responsibilities

For the EERA, UNICEF is the Grant Recipient and responsible to hire the direct workers. The estimated number of direct workers is 34. An appropriate project structure will be established to carry out such key functions as coordination, technical design and oversight, planning, fiduciary management, monitoring and evaluation, and reporting.

UNICEF

UNICEF will be responsible for supervising and supporting contractors which will be contracted to carry-out project specific tasks. The contractors are responsible for employing project workers to perform these tasks. UNICEF will be responsible for:

- Establishing the Labor Management Procedures (LMP)
- Ensuring implementation of the key provisions of the LMP among its direct staff and consultants
- Informing contractors of the provisions of the LMP and ensure provisions on key requirements are included in contracts
- Updating this Procedure, when necessary, in the course of preparation, development and implementation of the Project
- Maintaining records of recruitment and employment process of direct workers
- Monitoring that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation
- Monitoring training of the project workers on OHS
- Informing direct staff and contractors of available grievance mechanisms
- Ensuring all direct workers sign a Code of Conduct on GBV/SEA/SH

Contractor Management: UNICEF will use its own procurement procedures for solicitations and contracts. UNICEF will make reasonable efforts to ascertain that the contractor/service provider who will engage contracted workers is a legitimate and reliable entity and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the bidding documents. As part of the process to select the contractors/service providers who will engage contracted workers, UNICEF reviews the following documentation for vendor pre-qualification and registration:

- UNGM registration number
- Copy of valid official registration documents includes Trade registration certificate, Taxpayer card,
- Supplier profile Signed & stamped of UN Code of conduct document.
- Official Bank letter – signed & stamped - shows (Company Name, Bank account, and currency).
- Screening against UN Sanctions list

In addition, for high-value contracts (greater than USD \$100,000), the following are mandatory:

- Two-year set of financial statements for the full financial year signed/stamped (preferably audited)
- Certificate of incorporation
- Vendor's contact details' contact person, e-mail, and telephone number
- Screening against UN Sanctions list

Contractual Provisions and Non-Compliance Remedies: UNICEF will incorporate the agreed labor management requirements as specified in the bidding documents into contractual agreements with the

contractor/service provider, together with appropriate non-compliance remedies (such as the provision on withholding percentage of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; and removal of personnel from the works.). In the case of subcontracting, UNICEF will require the contractor/service provider to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

Performance Monitoring: UNICEF will monitor the performance of the contractors in relation to the LMP. The monitoring may include, inspections, and/or spot checks, which may be conducted through contractor self-reporting and/or third-party monitoring, of project locations or work sites and/or of labor management records and reports compiled by the contractor. Contractors' labor management records and reports that should be reviewed would typically include the following:

- Representative samples of employment contracts and signed code of conduct;
- Grievances received from the community and workers and their resolution;
- Reports relating to fatalities and incidents and implementation of corrective actions;
- Records relating to incidents of non-compliance with national Labor Code and the provisions of the LMP; and
- Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

Primary Supply Workers: Primary suppliers are those who will directly provide goods and materials to the project on an ongoing basis, such as learning and teaching materials and construction materials. When procuring goods and materials from primary suppliers, UNICEF will include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers. If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers, UNICEF will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, UNICEF will, within reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

Contractors and Primary Suppliers

Contractors and Primary Suppliers will be responsible for engagement and management of personnel (contracted workers), ensuring compliance with project protocols and providing labor instructions on safety and security. Service providers will be responsible for the following:

- Comply with OHS mitigation measures included in the ESMF and this labor management procedure. These measures will apply to contracted and sub-contracted workers
- Maintain records of recruitment and employment process of contracted workers
- Clearly communicate job description and employment conditions to contracted workers
- Report any incidents and accidents (in line with the definition of the ESCP) to UNICEF in a timely manner
- Establish / maintain a GM for their own workers (Annex 3)
- Have a system for regular review and reporting on labor, and occupational safety and health performance Ensure all contracted workers sign a Code of Conduct on GBV/SEA/SH Annex 3. Environment, Social (including labor), Health, and Safety requirements (ESHS)

Reporting on LMP

Contractors and Consultants will submit Monthly Progress Reports to the UNICEF with a section dedicated to progress on the implementation of proposals in this Labour Management Procedure and plan prepared based on this procedure. The section will report on non-compliance issues and timelines for compliance, incidence/accident reports, status of grievances received among others. The report will also discuss mitigation measures of identified emerging labour impacts/risks.

The UNICEF will compile a summary of the E&S issues on the Project in a quarter and submit to the Bank in the Quarterly Report. This document will also report on issues relating to ESS2 as well as progress and performance of implementing this LMP and other relevant ESSs.

Third-party monitoring reports and a project completion report capturing implementation of the LMP during the entire duration of the project will also be prepared by third party specialists.

Annex 3. Environment, Social (including labour), Health, and Safety Requirements

Contractors shall meet the following Environmental, Health, Safety and Social (including labor) requirements – thereafter called ESHS requirements¹³.

The ESHS requirements include 9 sections

1. Use generic ESMP
2. ESHS Training
3. Construction Site Management
4. Occupational Health and Safety (OHS)
5. Road safety and Traffic Safety
6. Emergency Preparedness and Response
7. Stakeholder Engagement
8. Labor force management, including the Code of Conduct
9. Contractor Environmental and Social Reporting

Use of generic ESMP

The Contractor shall:

- Adapt generic ESMP as applicable.
- Prepare a detailed explanation of how the contractor’s performance will meet the ESHS requirement. Ensure that sufficient funds are budgeted to meet the ESHS requirements, and that sufficient capacity is in place to oversee, monitor and report on ESMP performance.
- Put in place controls and procedures to manage their ESHS performance.
- Get prior written approval from UNICEF Engineers before starting construction or rehabilitation activities.

ESHS Training

The Contractor shall

- Determine ESHS training needs in collaboration with UNICEF
- Maintain records of all ESHS training, orientation, and induction.
- Ensure, through appropriate contract specifications and monitoring that service providers, as well as contracted and subcontracted labor, are trained adequately before assignments begin.
- Demonstrate that its employees are competent to carry out their activities and duties safely. For this purpose, the Contractor shall issue a Competence Certificate for every person working on site (relative to trade and aspect of work assignment) that specifies which tasks can be undertaken by which key personnel.

Orientation Training

The Contractor shall:

- Provide ESHS orientation training to all employees, including management, supervisors, and workers, as well as to subcontractors, so that they are apprised of the basic site rules of work at/on the site

¹³ The ESHS requirements build on the General EHS Guidelines of the World Bank Group, but also take into account other World Bank guidelines, and good practice notes, however, only some of them are applicable for the scale of Component1 activities

and of personal protection and preventing injury to fellow employees.

- Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Any site-specific hazard or color coding in use should be thoroughly reviewed as part of orientation training.

Visitor Orientation

The Contractor shall:

- Establish an orientation program for visitors, including vendors, that could access areas where hazardous conditions or substances may be present.
- Visitors shall not enter hazard areas unescorted.
- Ensure that visitors shall always be accompanied by an authorized member of the contractor, or a representative of UNICEF or of its Implementing Partners, who has successfully fulfilled the ESHS orientation training, and who is familiar with the project site construction hazards, layout, and restricted working areas.

New Task Employee and Contractor Training

The Contractor shall:

- Ensure that all workers and subcontractors, prior to commencement of new assignments, have received adequate training and information enabling them to understand work hazards and to protect their health from hazardous ambient factors that may be present. The training should adequately cover the step-by-step process that is needed for Project activities to be undertaken safely, with minimum harm to the environment, including:
 - Knowledge of materials, equipment, and tools
 - Known hazards in the operations and how they are controlled
 - Potential risks to health
 - Precautions to prevent exposure
 - Hygiene requirements
 - Wearing and use of protective equipment and clothing
 - Appropriate response to operation extremes, incidents and accidents
 - Construction Site Management

Vegetation

The Contractor shall:

- Prevent any unnecessary destruction, scarring, or defacing of the natural surroundings in the vicinity of the construction site
- Protect all trees and vegetation from damage by construction operations and equipment, except where clearing is required for permanent works, approved construction roads, or excavation operations
- Revegetate damaged areas on completion of the Works, and for areas that cannot be revegetated, scarifying the work area to a condition that will facilitate natural revegetation, provide for proper drainage, and prevent erosion
- Use, as much as possible, local species for replanting and species that are not listed as a noxious weed

- Repair, replant, reseed or otherwise correct, as directed by UNICEF or its representative, and at the Contractor's own expense, all unnecessary destruction, scarring, damage, or defacing of the landscape resulting from the Contractor's operations
- Transport labor and equipment in a manner to avoid as much as possible damage to grazing land, crops, and property

Protection of the Existing Installations

The Contractor shall:

- Safeguard all existing buildings, structures, works, pipes, cables, sewers, or other services or installations from harm, disturbance or deterioration during construction activities
- Coordinate with local authorities to identify existing infrastructure that might not be visible
- Repair any damage caused by the Contractor's activities, in coordination with concerned authorities.
- Take all reasonable precautions to prevent or reduce any disturbance or inconvenience to the owners, tenants or occupiers of properties to the construction activities, and more generally to the public
- Maintain safe access to public and private properties that might be affected by construction activities. If necessary, provide acceptable alternative means of passage or access to the satisfaction of the persons affected.
- Avoid working during night hours

Waste from Construction Activities

The Contractor shall:

- Collect and properly manage all solid wastes resulting from the construction activities, including construction debris and spoils, to prevent the contamination of soil and groundwater
- Remove unneeded excavation material from construction sites as soon as possible
- Agree with relevant municipalities about construction waste disposal
- Carefully select waste disposal sites, to be approved by UNICEF or its Implementing Partner
- Minimize littering of roads by ensuring that vehicles are licensed and loaded in such a manner as to prevent falling off or spilling of construction materials, and by sheeting the sides and tops of all vehicles carrying mud, sand, other materials or debris
- Transfer construction waste to assigned places in the selected waste disposal sites with documented confirmation.
- Properly dispose of solid waste and debris at designated permitted sites waste disposal sites allocated by the local authorities and obtain a receipt of waste from the authorized landfill authority.

Air Quality

The most common pollutant involved in fugitive emissions is dust or particulate matter (PM) that is released during the transport and open storage of solid materials, and from exposed soil surfaces, including unpaved roads. Accordingly, the Contractor shall:

- Use dust control methods, such as covers, water suppression, or increased moisture content for open materials storage piles, or controls, including air extraction and treatment through a baghouse or cyclone for material handling sources, such as conveyors and bins.

- Use water suppression for control of loose materials on paved or unpaved road surfaces. Oil and oil by-products are not a recommended method to control road dust.
- Use wheel washes at quarries, ready-mix plants, construction sites, and other facilities to prevent track-out of mud, dust and dirt on to public road.
- Regularly clean road surfaces within the construction sites to remove accumulated fine material, and regularly clean transportation vehicles.
- Cover open bodied trucks handling sand, gravel or earth.
- Minimize smoke from diesel engines by regular and proper maintenance, in particular by ensuring that the engine, injection system and air cleaners are in good condition.

Hazardous and Toxic Materials

Toxic and deleterious wastes resulting from the Contractor's activities require special attention in order to forestall their introduction into the natural environment which could result in harm to people, aquatic life or natural growth of the area. Accordingly, the Contractor shall:

- Train workers regarding the handling of hazardous materials
- Label using easily understandable symbols, and provide material safety data sheets, for chemical substances and mixtures according to the Globally Harmonized System (GHS) of classification and labelling of chemicals.
- Store hazardous materials as per the statutory provisions of the Manufactures, Storage and Import of Hazardous Chemicals Rules (1989), under the Environment (Protection) Act, 1986.
- Provide adequate secondary containment for fuel storage tanks and for the temporary storage of other fluids such as lubricating oils and hydraulic fluids,
- Use impervious surfaces for refueling areas and other fluid transfer areas
- Train workers on the correct transfer and handling of fuels and chemicals and the response to spills
- Provide portable spill containment and cleanup equipment on site and training in the equipment deployment
- Deposit or discharge toxic liquids, chemicals, fuels, lubricants and bitumen into containers for salvage or subsequent removal to off-site locations.
- Treat hazardous waste separately from other waste
- Avoid the storage or handling of toxic liquid adjacent to or draining into drainage facilities.
- Keep absorbent materials or compounds on Site in sufficient quantities corresponding to the extent of possible spills.
- Locate landfill pits for the disposal of solid waste at least 100 m from water courses and fencing them off from local populations.
- Ensure adequate primary treatment of sanitation effluents and installing septic tanks away from village watering points.

Area Signage

The Contractor shall:

- Appropriately mark hazardous areas.
- Install warning signs
- Ensure that signage is in accordance with international standards and is well known to, and easily

understood by workers, visitors and the general public as appropriate.

- Demarcate work sites with safety tape, fencing or barricades, as appropriate, to prevent unauthorized access to the construction sites
- Safeguard public safety by covering holes and by installing guardrails along temporary pathways.
- Health and Safety
- Contractors will collaborate with other contractors in applying health and safety requirements, when workers from more than one contractor are working together in one location, without prejudice to the responsibility of each party for the health and safety of its own workers.

Severe Weather and Facility Shutdown

The Contractor shall:

- Design and build workplace structures to withstand the expected elements for the region and designate an area designated for safe refuge, if appropriate.
- Develop Standard Operating Procedures (SOPs) for project or process shutdown, including an evacuation plan.

Lavatories and Showers.

The Contractor shall:

- Provide adequate lavatory facilities (toilets and washing areas) for the number of people expected to work at the construction sites, and make allowances for segregated facilities, or for indicating whether the toilet facility is "In Use" or "Vacant".
- Provide toilet facilities with adequate supplies of hot and cold running water, soap, and hand drying devices.
- Where workers may be exposed to substances poisonous by ingestion and skin contamination may occur, provide facilities for showering and changing into and out of street and work clothes.

Potable Water Supply

The Contractor shall:

- Provide adequate supplies of potable drinking water from a fountain with a sanitary means of collecting the water for the purposes of drinking
- Ensure that water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) meets drinking water quality standards

Clean Eating Area

The Contractor shall:

- Where there is potential for exposure to substances poisonous by ingestion, make suitable arrangements to provide clean eating areas where workers are not exposed to the hazardous or noxious substances

Personal Protective Equipment (PPE)

The Contractor shall:

- Identify and provide at no cost appropriate PPE to workers, the workers of subcontractors, as well as to visitors, which gives adequate protection without incurring unnecessary inconvenience to the individual

- Ensure that the use of PPE is compulsory.
- Provide sufficient training in the use, storage and maintenance of PPE to its workers and workers of its subcontractors.
- Properly maintain PPE, including cleaning when dirty and replacement when damaged or worn out;
- Determine requirements for standard and/or task-specific PPE based on of Job specific Safety Analysis (JSA);
- Consider the use of PPE as a last resort when it comes to hazard control and prevention, and always refer to the hierarchy of hazard controls when planning a safety process.

Noise

The Contractor shall institute appropriate measures to reduce the exposure of workers to construction noise, including but not limited to:

- Avoid exposure to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day without hearing protection. In addition, no unprotected ear should be exposed to a peak sound pressure level (instantaneous) of more than 140 dB(C).
- Enforce the use of hearing protection should be enforced actively when the equivalent sound level over 8 hours reaches 85 dB(A), the peak sound levels reach 140 dB(C), or the average maximum sound level reaches 110 dB(A).
- Provide hearing protective devices capable of reducing sound levels at the ear to at most 85 dB(A).
- Reduce the “allowed” exposure period or duration by 50 percent for every 3 dB(A) increase in excess of 85 dB(A).
- Perform periodic medical hearing checks on workers exposed to high noise levels.
- Rotate staff to limit individual exposure to high levels.
- Install practical acoustical attenuation on construction equipment, such as mufflers.
- Use silenced air compressors and power generators
- Keep all machinery in good condition
- Install exhaust silencing equipment on bulldozers, compactors, crane, dump trucks, excavators, graders, loaders, scrapers and shovels.
- Post signs in all area where the sound pressure level exceeds 85 dB(A).
- Shut down equipment when not directly in use
- Provide advance notice to occupants if an activity involving high level impact noise is in close proximity to buildings.

Old asbestos waste

The contractor shall apply all the required measures to protect the workers and the surrounding communities from the hazards associated with the old asbestos waste, in accordance with the WBG General EHS Guidelines (www.ifc.org/EHSguidelines), including but not limited to the following:

- Treat the waste contaminated with asbestos safely in collection, transportation and proper disposal in the authorized site to prevent spreading into the air.
- Providing the containers to use for isolating the asbestos material, the signs to install in the site and the criteria for choosing the location in which to bury the asbestos are available for the disposal.
- Ensure that the equipment used for and next to the Asbestos Cement Material (ACM) is washed

after use.

- Ensure that the resting areas and the eating facilities are clear from any potential contamination from asbestos.
- Provide adequate washing facilities.
- Ensure that the PPE provided to the workers on site includes disposable coveralls, safety goggles, gloves and footwear.
- Ensure that a local exhaust ventilation system (LEV) that draws in airborne asbestos is in place when cutting (ACM).
- Ensure that the appropriate filter is installed in the LEV to capture the airborne asbestos before releasing to the environment. The filters should also be treated as a hazardous waste for disposal.
- Ensure that training that is fit for purpose is delivered to the workers to enhance their awareness of the health and safety risks when working with asbestos, to inform them on the method of work and on the control measures to have in place.
- Excavated contaminated soil to be directly placed into the truck and cover it and transport it while it still wet to minimize its effects
- Contaminated soil and damaged asbestos materials and pipes should be buried to prevent spreading into the air.
- Arrangements in the disposal area should be done to ensure it is done properly and documented.
- Proper masks should be worn by all workers and supervisors in the working area. Respirators must be equipped with HEPA filtered cartridges (color coded purple) or an N-100, P-100 or R-100 NIOSH rating.

Painting

The contractor shall apply all the required measures to protect the workers and the surrounding communities from the hazards associated with painting works including the hazards resulting from use of lead containing paint, in accordance with the WBG General EHS Guidelines (www.ifc.org/EHSguidelines), including but not limited to the following:

- Provide workers with specialized training and provided with, and wear, appropriate PPE (gloves, apron, splash suits, face shield or goggles, etc.);
- Ensure that the air is renewed, and ventilation are continuous inside the work station;
- Apply working shift time with minimum time for every worker;
- Ensure that emergency showers are close to the working site;
- Ensure availability of the first aid box; and
- Ensure not procure or use paints containing lead.

First Aid and Accidents

The Contractor shall:

- Ensure that qualified first-aid by qualified personnel is always available. Appropriately equipped first-aid stations should be easily accessible throughout the place of work.
- Provide workers with rescue and first-aid duties with dedicated training so as not to inadvertently aggravate exposures and health hazards to themselves or their co-workers. Training would include the risks of becoming infected with blood-borne pathogens through contact with bodily fluids and tissue.

- Provide eye-wash stations and/or emergency showers close to all workstations where immediate flushing with water is the recommended first-aid response.
- Provide dedicated and appropriately equipped first-aid room(s) where the scale of work or the type of activity being carried out so requires.
- Equip first aid stations and rooms with gloves, gowns, and masks for protection against direct contact with blood and other body fluids.
- Make widely available written emergency procedures for dealing with cases of trauma or serious illness, including procedures for transferring patient care to an appropriate medical facility.
- Immediately report all accidental occurrences with serious accident potential such as major equipment failures, contact with high-voltage lines, exposure to hazardous materials, slides, or cave-ins to UNICEF.
- Immediately investigate any serious or fatal injury or disease caused by the progress of work by the Contractor and submit a comprehensive report to UNICEF.

Communicable Diseases

Recognizing that no single measure is likely to be effective in the long term, the Contractor shall implement a combination of behavioral and environmental modifications to mitigate communicable diseases:

- Conduct Information, Education and Consultation Communication (IEC) campaigns, at least every other month, addressed to all construction sites staff (including all the Contractor's employees, all subcontractors of any tier, consultants' employees working on the site, and truck drivers and crew making deliveries to the site for Works and Services executed under the Contract, concerning the risks, dangers and impact, and appropriate avoidance behavior of communicable diseases.
- Provide for active screening, diagnosis, counselling and referral of workers to a dedicated national STD and HIV/AIDS program, (unless otherwise agreed) for all Site staff and labor.
- Provide male or female condoms to all Site staff and workers, as appropriate.
- Provide treatment through standard case management in on-site or community health care facilities.
- Ensure ready access to medical treatment, confidentiality and appropriate care, particularly with respect to migrant workers.
- Promote collaboration with local authorities to enhance access of workers families and the community to public health services and ensure the immunization of workers against common and locally prevalent diseases.
- Provide basic education on the conditions that allow the spread of other diseases such as COVID-19, Cholera and other communicable diseases. The training should cover sanitary hygiene education.
- Prevent illness in immediate local communities by:
 - Implementing an information strategy to reinforce person-to-person counselling addressing systemic factors that can influence individual behavior as well as promoting individual protection, and protecting others from infection, by encouraging condom use
 - Conducting immunization programs for workers in local communities to improve health and guard against infection
 - Providing health services

COVID-19¹⁴

In the context of the COVID-19 pandemic, Contractors shall develop and implement measures to prevent or minimize an outbreak of COVID-19 and develop procedures indicating what should be done if a worker gets sick. The Contractor shall:

- Assess the characteristics of the workforce, including those with underlying health issues or who may be otherwise at risk
- Confirm that workers are fit for work, including temperature testing and refusing entry to sick workers
- Consider ways to minimize entry/exit to site or the workplace, and limit contact between workers and the community/general public
- Train workers on hygiene and other preventative measures, and implement a communication strategy for regular updates on COVID-19 related issues and the status of affected workers
- Treat workers who are or should be self-isolating and/or are displaying symptoms
- Assess risks to continuity of supplies of medicine, water, fuel, food and PPE, taking into account international, national and local supply chains
- Reduce, store and dispose of medical waste
- Adjust work practices to reduce the number of workers and increase social distancing
- Expand health facilities on-site compared to usual levels, develop relationships with local health care facilities and organize for the treatment of sick workers
- Build worker accommodations further apart, or have one worker accommodation in a more isolated area, which may be easily converted to quarantine and treatment facilities, if needed
- Establish a procedure to follow if a worker becomes sick (following WHO guidelines)
- Implement a communication strategy with the community, community leaders and local government in relation to COVID-19 issues on the site.

Vector-Borne Diseases

Reducing the impact of vector-borne disease on the long-term health of workers is best accomplished by implementing diverse interventions aimed at eliminating the factors that lead to disease. The Contractor, in close collaboration with community health authorities, shall implement an integrated control strategy for mosquito and other arthropod-borne diseases that includes the following measures:

- Prevent of larval and adult propagation through sanitary improvements and elimination of breeding habitats close to human settlements
- Eliminate unusable impounded water
- Increase water velocity in natural and artificial channels
- Consider the application of residual insecticide to dormitory walls
- Implement integrated vector control programs
- Promote the use of repellents, clothing, netting, and other barriers to prevent insect bites
- Use chemoprophylaxis drugs by non-immune workers and collaborating with public health officials to help eradicate disease reservoirs
- Monitor and treat circulating and migrating populations to prevent disease reservoir spread

¹⁴ Based on the World Bank COVID-19 LMP Template, April 16, 2020

- Collaborate and exchange in-kind services with other control programs in the project area to maximize beneficial effects
- Educate project personnel and area residents on risks, prevention, and available treatment
- Monitor communities during high-risk seasons to detect and treat cases
- Distribute appropriate education materials
- Follow safety guidelines for the storage, transport, and distribution of pesticides to minimize the potential for misuse, spills, and accidental human exposure

Road safety and Traffic Safety

The Contractor shall ensure traffic safety by all project personnel during displacement to and from the workplace, and during the operation of project equipment on private or public roads. The Contractor shall adopt best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public, including:

- Emphasize safety aspects among drivers
- Improve driving skills and requiring licensing of drivers
- Institute defensive driving training for all drivers prior to starting their job
- Adopt limits for trip duration and arranging driver rosters to avoid overtiredness
- Avoid dangerous routes and times of day to reduce the risk of accidents
- Use speed control devices (governors) on trucks, and remote monitoring of driver actions
- Require that drivers and co-passengers wear seatbelts, and duly sanction defaulters.
- Regularly maintain vehicles and use manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.
- Where the project may contribute to significant changes in traffic along existing roads the Contractor shall:
- Commence activities that affect public motorways and highways, only after all traffic safety measures necessitated by the activities are fully operational.
- Arrange diversions for providing alternative routes for transport and/or pedestrians
- Minimize pedestrian interaction with construction vehicles, particularly at crossing points to schools, markets, and any animal crossing points of significance, through appropriate signage, engineered footpaths or traffic slowing devices.
- Organize meaningful road accident awareness events at all roadside schools and communities within 150 meters of the road centerline, covering safe road crossing, road accident hazards from weather conditions and vehicle roadworthiness, overloading and driver alertness, dangers posed by parked and broken-down vehicles, etc.
- Collaborate with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present.
- Collaborate with local communities on education about traffic and pedestrian safety (e.g., school education campaigns).
- Coordinate with emergency responders to ensure that appropriate first aid is provided to all affected persons in the event of accidents.
- Use locally sourced materials, whenever possible, to minimize transport distances, and locate

associated facilities such as worker camps close to project sites.

- Employ safe traffic control measures, including road signs, traffic cones, removable barriers, and flag persons to warn of dangerous conditions.
- Avoid indirect damage to existing cultural heritage, such as affecting masonry through vibration

Emergencies

The Contractor shall establish and maintain an emergency preparedness and response system, in collaboration with appropriate and relevant third parties including to cover: (i) the contingencies that could affect personnel and facilities of the project to be financed; (ii) the need to protect the health and safety of project workers; (iii) the need to protect the health and safety of the Affected Communities. The emergency preparedness and response system shall include:

- Identification of the emergency scenarios
- Specific emergency response procedures
- Training of emergency response teams
- Emergency contacts and communication systems/protocols (including communication with Affected Communities when necessary)
- Procedures for interaction with government authorities (emergency, health, environmental authorities)
- Permanently stationed emergency equipment and facilities (e.g., first aid stations, firefighting equipment, spill response equipment, personal protection equipment for the emergency response teams)
- Protocols for the use of the emergency equipment and facilities
- Clear identification of evacuation routes and muster points
- Emergency drills and their periodicity based on assigned emergency levels or tiers
- Decontamination procedures and means to proceed with urgent remedial measures to contain, limit and reduce pollution within the physical boundaries of the project property and assets to the extent possible.

Stakeholder Engagement

As part of the overall Project Stakeholder Engagement¹⁵, the Contractor will undertake a process of stakeholder engagement with representative persons and communities directly affected by the activities it undertakes, including, if necessary, the public disclosure of its ESMP. The Contractor shall also maintain throughout the Project good relations with local communities and will give these communities prior notice of plans and schedules as they might affect local people.

Labour Force Management

Labor Conditions

The Contractor shall:

- Implement the measures and commitments defined in the Project Labor Management Procedures.
- Provide all workers with terms and conditions that comply with Afghanistan Labor Legislation, and

¹⁵ The overall process of stakeholder engagement is described in the Project Stakeholder Engagement Plan (SEP)

applicable International Labour Organization conventions on workplace conditions.

- Put in place workplace processes for project workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.
- Avoid all forms of forced or compulsory labor, i.e., all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

Insurance

The Contractor shall:

- Protect the health of workers involved in onsite activities, as indicated in Afghanistan Labor legislation
- Compensate any employee for death or injury

Grievance Mechanism for Workers

The Contractor shall put in place a Grievance Redress Mechanism (GRM) for its workers and the workers of its subcontractors that is proportionate to its workforce. The GRM for workers shall be distinct from the Project level Grievance Mechanism described in the Project Stakeholder Engagement Plan (SEP) for affected individuals and communities, and shall adhere to the following principles:

- *Provision of information.* All workers should be informed about the grievance mechanism at the time they are hired, and details about how it operates should be easily available, for example, included in worker documentation or on notice boards.
- *Transparency of the process.* Workers must know to whom they can turn in the event of a grievance and the support and sources of advice that are available to them. All line and senior managers must be familiar with their organization's grievance procedure.
- *Keeping it up to date.* The process should be regularly reviewed and kept up to date, for example, by referencing any new statutory guidelines, changes in contracts or representation.
- *Confidentiality.* The process should ensure that a complaint is dealt with confidentially. While procedures may specify that complaints should first be made to the workers' line manager, there should also be the option of raising a grievance first with an alternative manager, for example, a human resource (personnel) manager.
- *Non-retribution.* Procedures should guarantee that any worker raising a complaint will not be subject to any reprisal.
- *Reasonable timescales.* Procedures should allow for time to investigate grievances fully but should aim for swift resolutions. The longer a grievance is allowed to continue, the harder it can be for both sides to get back to normal afterwards. Time limits should be set for each stage of the process, for example, a maximum time between a grievance being raised and the setting up of a meeting to investigate it.
- *Right of appeal.* A worker should have the right to appeal to the World Bank or national courts if he or she is not happy with the initial finding.
- *Right to be accompanied.* In any meetings or hearings, the worker should have the right to be accompanied by a colleague, friend or union representative.

- *Keeping records.* Written records should be kept at all stages. The initial complaint should be in writing, if possible, along with the response, notes of any meetings and the findings and the reasons for the findings. Any records on SEA shall be registered separately and under the strictest confidentiality.
- *Relationship with collective agreements.* Grievance procedures should be consistent with any collective agreements.
- *Relationship with regulation.* Grievance processes should be compliant with the national employment code.

Protection from Sexual Exploitation and Abuse¹⁶

The Contractor shall:

- Provide repeated training and awareness raising to the workforce about refraining from unacceptable conduct toward local community members, specifically women and children
- Inform workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted
- Prohibit its employees from exchanging any money, goods, services, or other things of value, for sexual favors or activities, or from engaging any sexual activities that are exploitive or degrading to any person.
- Develop a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.
- Adopt a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence.

Protection from Child Labor

The Contractor shall:

- Verify that workers are older than 18 when hiring
- Exclude all persons under the age of 18.
- Review and retain copies of verifiable documentation concerning the age of workers
- Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank’s safeguard policies on child labour and minimum age.

Code of Conduct

The Contractor shall ensure that all employees, including those of subcontractors, are informed about and sign the following Code of Conduct:

CODE OF CONDUCT FOR CONTRACTOR’S PERSONNEL

We the Contractor [enter name of Contractor] have signed a contract with UNICEF for [enter description of the activities]. These activities will be carried out at [enter the Site and other locations where the activities will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the activities, including the risks of sexual exploitation and assault and gender-based violence.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the

¹⁶ UNICEF has prepared a Sexual Abuse and Exploitation (SEA) and Sexual Harassment (SH) Prevention and Response Plan for the Project

activities. It applies to all our staff, including laborers and other employees at the at all the places where the activities are being carried out. It also applies to the personnel of every subcontractor and any other personnel assisting us in the execution of the activities. All such persons are referred to as “Contractor’s Personnel” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor’s Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

Required Conduct

Contractor’s Personnel shall:

- carry out his/her duties competently and diligently.
- comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor’s Personnel and any other person.
- maintain a safe working environment including by:
- ensuring that workplaces, machinery, equipment and processes under each person’s control are safe and without risk to health.
- wearing required personal protective equipment.
- using appropriate measures relating to chemical, physical and biological substances and agents; and
- following applicable emergency operating procedures.
- report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health.
- treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children.
- not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor’s or Employer’s Personnel.
- not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed projects, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain.
- not engage in Sexual Assault, which means sexual activity with another person who does not consent. It is a violation of bodily integrity and sexual autonomy and is broader than narrower conceptions of “rape”, especially because (a) it may be committed by other means than force or violence, and (b) it does not necessarily entail penetration.
- not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage.
- complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Assault (SEA).
- report violations of this Code of Conduct; and

analysis, new or different equipment, skills training, and so forth).

- *Environmental incidents and near misses*: environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
- *Major works*: those undertaken and completed, progress against project schedule, and key work fronts (work areas).
- *ESHS requirements*: noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other ESHS requirements.
- *ESHS inspections and audits*: by the Contractor, UNICEF and its Implementing Partners, or others—to include date, inspector or auditor name, sites visited, and records reviewed, major findings, and actions taken.
- *Workers*: list of workers at each site, confirmation of ESHS training, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labor is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- *Training on ESHS issues*: including dates, number of trainees, and topics.
- *Footprint management*: details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
- *External stakeholder engagement*: highlights, including formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
- *Details of any security risks*: details of risks the Contractor may be exposed to while performing its work—the threats may come from third parties external to the project.
- *Worker grievances*: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
- *External stakeholder grievances*: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender disaggregated.
- *Major changes to Contractors environmental and social practices*.
- *Deficiency and performance management*: actions taken in response to previous notices of deficiency or observations regarding ESHS performance and/or plans for actions to be taken should continue to be reported to UNICEF until it determines the issue is resolved satisfactorily.

Annex 4. Generic Environmental and Social Management Plan for subprojects

The generic ESMP may be modified, if required.

Potential Risks and Impacts	Proposed Mitigation Measures	Phase		Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring	Estimated Cost ⁵ (USD)
		Planning	Implementation		Continuous	Monthly	Quarterly		
Exclusion of vulnerable groups from project's benefits	<ul style="list-style-type: none"> Implement and monitor Project GRM 	X	X	<ul style="list-style-type: none"> per cent of GRM cases addressed 			X	Implementation : UNICEF/IPs Monitoring: UNICEF	
Lack of access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring, as project locations are likely to be remote areas or conflict-prone areas	<ul style="list-style-type: none"> Work through local partners with sufficient access Implement SMP 	X	X	<ul style="list-style-type: none"> Availability of GRM # of stakeholder information sessions and consultations sessions conducted 	X			Implementation IPs Monitoring: UNICEF	

⁵ The costs cannot be fully determined at this stage. They will be calculated for each activity in the activity specific ESMPs.

<p>Work-related accidents and injuries are likely to increase during civil work</p> <p>OHS risks including infection and disease</p> <p>Poor working conditions: unsafe work environment</p>	<p>Implement the ESHS provisions on OHS (Annex 3)</p>		<p>X</p>	<ul style="list-style-type: none"> ○ Safety measures in place 	<p>X</p>			<p>Implementation: Contractors/IPs</p> <p>Monitoring: UNICEF/IP</p>	
<p>Conflicts over provision of employment or contracts</p>	<ul style="list-style-type: none"> ○ Comply with the LMP (Annex 2), in addition to: ○ Apply fair terms and conditions shall be applied for workers (guided by relevant laws and WB ESS2) ○ Operationalize workers' GRM to promptly address their workplace grievance (see LMP Annex 2 and ESHS Annex 3) ○ The project shall respect the workers' rights of labour unions and freedom of association 		<p>X</p>	<ul style="list-style-type: none"> ○ # of reported disputes by workers through workers' GRM ○ per cent of cases resolved in a timely manner (according to the workers' GRM records) ○ Records of composition of the labour force (male/female, communities of origins of the workers) 	<p>X</p>			<p>Implementation: Contractors/ IPs</p> <p>Monitoring: UNICEF</p>	

<p>Delayed payment of workers for work leading to complaints and conflict</p>	<ul style="list-style-type: none"> ○ Implement and monitor LMP ○ Implement and monitor workers' GRM ○ Communication / awareness campaign of payment mechanisms 		<p>X</p>	<ul style="list-style-type: none"> ○ # Of cases filed with workers' GRM that relate to payment ○ Records of cases filed through workers' GRM ○ Evidence of communication and awareness campaigns ○ No of delayed payments as evidenced by record of payments made by IPs with date 	<p>X</p>			<p>Implementation: Contractors</p> <p>Monitoring: UNICEF</p>	
<p>Labour standards are not in accordance to national laws and international standards</p>	<p>Implement and monitor the LMP (Annex 2) in addition to:</p> <ul style="list-style-type: none"> ○ Develop and implement OHS Plan for workers ○ Listing of all staff and titles, new hires and departure ○ sites visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name 		<p>X</p>	<ul style="list-style-type: none"> ○ OHS Plan in place and compliance status available ○ Staff lists available ○ Site visits conducted 	<p>X</p>			<p>Implementation: Contractors</p> <p>Monitoring: UNICEF</p>	

<p>Insecurity of all project workers and project affected persons</p>	<ul style="list-style-type: none"> ○ Comply with the measures prescribed in the SMP to secure work sites ○ Follow all security protocols in the SMP ○ All visitors to construction sites will be required to fill a visitors' form providing all personal details and purpose of the visit ○ Security induction must be done to all project workers 		X	<ul style="list-style-type: none"> ○ # Of workers trained ○ Per cent of sites with security protocols 	X			<p>Implementation: UNICEF/IPs /Contractors</p> <p>Monitoring: UNICEF</p>	
<p>Child and forced labour</p>	<p>Comply with the LMP (Annex 2) in addition to:</p> <ul style="list-style-type: none"> ○ Set a minimum age for all types of work (in compliance with national laws and ESS2) and document age of workers upon hiring ○ Conduct a track record search of the contractors at the bidding process (record of health and safety violations, fines, consult public documents related 	X	X	<ul style="list-style-type: none"> ○ # Of violations (child, forced labour) ○ # Of existence/maintenance of a labour registry of all contracted workers with age verification ○ # of awareness campaigns 	X			<p>Implementation: Contractors/I Ps</p> <p>Monitoring: UNICEF/IPs</p>	

	to workers' rights violations etc.) ○ Raise awareness of communities/suppliers to not engage in child labour								
Discrimination against women in employment	○ Recruitment and retention policies that enable fair working conditions and women's safe and equitable participation. ○ List number of workers, indication of origin, gender, and skill level (unskilled, skilled, supervisory, professional, management).		X	○ List of workers available ○ Number of complaints related to discrimination on the basis of gender	X			Implementation: Contractors/ IPs Monitoring: UNICEF	
Emergency Preparedness and Response	○ Develop site specific emergency plan	X		Emergency plan in place	x			Implementation: Contractors/ IPS Monitoring: UNICEF	
Construction works exacerbate soil erosion, erosion and sedimentation of rivers from earth works and run-off/flash floods	○ Avoid or minimize clearing of vegetation during preparation for rehabilitation and construction works in the targeted areas, to reduce chances of soil erosion	X	X	○ per cent of land with vegetation rehabilitated	X			Implementation: Contractors Monitoring: UNICEF/IPs	

	<ul style="list-style-type: none"> ○ Proceed to revegetation when possible, with native trees and vegetation after vegetation removal ○ Carefully design siting of the activity site to avoid soil erosion ○ Rehabilitation of borrow pits sites after extraction 								
Soil pollution	<ul style="list-style-type: none"> ○ Implement ESHS measures on waste management (Annex 3) ○ 	X	X	<ul style="list-style-type: none"> ○ Evidence of proper waste disposal ○ Evidence of presence of a drainage system 	X			Implementation: Contractors Monitoring: UNICEF	
Dust emissions (air quality)	Implement ESHS air quality (Annex 3)		X	<ul style="list-style-type: none"> ○ Evidence that spraying of water is conducted ○ # Of workers that have been provided with dust masks ○ # of trucks that are covered with tarpaulin 	X			Implementation: Contractors Monitoring: UNICEF/ IPS	
Noise/vibrations	Implement ESHS noise prevention measure (Annex 3)	X	X	<ul style="list-style-type: none"> ○ Evidence of muffler installation where relevant 	X			Implementation: Contractors	

				<ul style="list-style-type: none"> ○ # Of workers supplied with ear plugs/mufflers 				Monitoring: UNICEF/IPS	
Water bodies contamination from uncontrolled spillages, wastewater	<p>Implement ESHS provisions on waste management, handling of hazardous and toxic materials (Annex 3) in addition to</p> <ul style="list-style-type: none"> ○ Avoid high water table areas during excavations and use appropriate technologies such as lining ○ Equip drainage systems with a water/oil separator ○ Limit the use of chemical products such as oils, lubricants and fuels; and control/supervise its usage 		X	Evidence of proper waste disposal	X			Implementation: IPs	Monitoring: UNICEF/IPS
Waste generation (liquid, solid, hazardous), for example from use of fossil fuel- based equipment and machinery	<p>Implement ESHS provisions on waste management, handling of hazardous and toxic materials (Annex 3) in addition to</p> <ul style="list-style-type: none"> ○ Ensure provision of waste bin on site ○ Efficient use of materials 		X	<ul style="list-style-type: none"> ○ # Of waste bins on site ○ # Of incidents/releases of waste ○ # Of sanitary facilities on construction sites 	X			Implementation: Contractors	Monitoring: UNICEF IPs

	<ul style="list-style-type: none"> ○ Avoid and minimize waste production ○ Ensure waste is recycled/reused before opting to dispose ○ Train workers in waste management 								
Disposal and management of large amounts of excavated material generated from construction	Implement ESHS provisions on construction waste management (Annex 3)		X	<ul style="list-style-type: none"> ○ Excavated material disposed at designated sites 	X			Implementation: Contractors	Monitoring: UNICEF/IPs
Improper disposal of human waste which may contaminate soils and water bodies	Implement ESHS provisions in lavatories and showers (Annex 3)		X	<ul style="list-style-type: none"> ○ # of sanitary facilities on construction sites 	X			Implementation: Contractors	Monitoring: UNICEF/ IPs
Common pests attracted to dirty environment (rats, cockroaches, flies) are also disease vectors, transporting germs from the toilet to nearby	<ul style="list-style-type: none"> ○ Provide hand washing facilities and water in all the sanitation infrastructures ○ Ensure proper cleaning of toilets ○ Ensure and provide training on cleaning of toilet 		X	<ul style="list-style-type: none"> ○ Hand washing facilities provided ○ Records of hygiene status of toilets available ○ # Of trainings provided to the community 		X		Implementation: Contractors / communities/ IPs	Monitoring: UNICEF/IPs

human settlement (latrines) Latrines have the possibilities of spread and contact of pathogens and other pollutants with humans at the household level	<ul style="list-style-type: none"> ○ Use biopesticides to manage pests 								
Latrine usage and maintenance can be at risk should communities fail to recognize the health benefits linked to such technology	<ul style="list-style-type: none"> ○ Locate facilities in a location that is safe for women, girls and young children to use without risks to safety and security ○ Construct facilities in a manner that will be accessible to children and PWDs 	X	X	<ul style="list-style-type: none"> ○ Checklist developed and used to identify safe locations ○ Designed with provisions to allow for children's access and accommodates PWDs 	X			Implementation: Contractors Monitoring: UNICEF/IPs	
Road safety traffic accidents/fatalities due to presence of traffic of heavy machinery through the communities	Implement the ESHS requirements (Annex 3) for road safety and traffic safety		X	<ul style="list-style-type: none"> ○ Evidence of speed limit signs ○ Evidence of speed bumps ○ Evidence of warning signs ○ Evidence of local procurement 	X			Implementation: Contractors Monitoring: UNICEF/IPs	
Fire outbreaks as a result of improper use/ storage of flammable products	<ul style="list-style-type: none"> ○ Provide fire hazard training to construction workers ○ Provide evacuation route 		X	<ul style="list-style-type: none"> ○ number of workers trained ○ Clearly marked evacuation routes 	X			Implementation: Contractors/ IPs	

	<ul style="list-style-type: none"> ○ Adequately store any flammable materials 			<ul style="list-style-type: none"> ○ Life and fire safety 				Monitoring: UNICEF/IPs	
Risk of wildfires	<ul style="list-style-type: none"> ○ Proper siting of activity area at sufficient distance of any forest areas ○ Appropriate storage areas for chemicals, hazardous and flammable materials 		X	<ul style="list-style-type: none"> ○ Storage areas available 		X		Implementation: Contractors Monitoring: UNICEF/IPs	
Health and safety risks from creation of open pits following extraction of construction materials (for children and communities and breeding grounds for mosquitoes)	<p>Implement ESHS requirements on vector borne diseases (Annex 3) in addition to:</p> <ul style="list-style-type: none"> ○ Fence the area and post warning signs at entrance 		X	<ul style="list-style-type: none"> ○ Presence of unusable impounded water ○ Presence of fences ○ Number of incidents /injuries caused by open pits 		X		Implementation: Contractors Monitoring: UNICEF	
Increase of transmission of infectious diseases (COVID-19)	<ul style="list-style-type: none"> ○ Implement ESHS requirements on Covid 19 (Annex 3) 		X	<ul style="list-style-type: none"> ○ # Of reported cases on sites ○ Evidence of PPE used and social distancing among workers 	X			Implementation: Contractors/ IPs Monitoring: UNICEF	

<p>Damages to infrastructure caused by natural disasters (flooding, earthquakes, snow avalanches/flashfloods, landslides) causing EHS and OHS issues among workers and communities</p>	<ul style="list-style-type: none"> ○ Build resilient infrastructures in safe locations, careful siting and conception at project design phase ○ Training of workers and communities on emergency procedures ○ Make provisions for a health unit or first aid and prepare an emergency response plan for each activity 	<p>X</p>	<p>X</p>	<ul style="list-style-type: none"> ○ Evidence of an ERP in place ○ # Of trainings conducted ○ # Of First-aid kit/help on site or nearby 		<p>X</p>		<p>Implementation: UNICEF/IPS</p> <p>Monitoring: UNICEF/IP</p>	
<p>SEA/SH increase among workers and communities members</p>	<ul style="list-style-type: none"> ○ Comply with the measures prescribed in the SEA Action Plan and ESHS provisions on prevention of SEA, in addition to: ○ Sensitization/community awareness of project workers and the benefiting communities. ○ Implementation of a designated GRM to handle these types of complaints ○ Each contractor to implement CoC for the workers with specific obligations with regards to SEA/SH 		<p>X</p>	<ul style="list-style-type: none"> ○ # Of SEA/SH related complaints recorded ○ per cent of complaints handled in timely ○ per cent of workers that have signed CoCs. ○ # of SEA/SH community awareness trainings 		<p>X</p>		<p>Implementation: Contractor/IPS</p> <p>Monitoring: UNICEF/IPs</p>	

	<ul style="list-style-type: none"> ○ All project staff should be trained in SEA awareness programs for workers and the beneficiary community 							
Exclusion of vulnerable groups in the stakeholder engagement processes	<p>Implement the SEP in addition to</p> <ul style="list-style-type: none"> ○ Identify minority, marginalized and disadvantaged communities in each of the participating districts. ○ Establish and maintain continuous liaison with the communities including marginalized groups to sensitize them on the project objectives and design. ○ Use innovative communication means to reach the communities with information on the project. ○ Establish GRM structures in the communities and sensitize the communities on the project GRM. 	X		<ul style="list-style-type: none"> ○ # Of marginalized, minority and disadvantaged groups per districts ○ # Of meetings held ○ # Of participants to the consultation belonging to a vulnerable category ○ Level of participation to the programs (in per cent of total number of people eligible) 	X			<p>Implementation: UNICEF/IPs</p> <p>Monitoring: UNICEF/IPs</p>

	o Maintain a system of receiving and responding to any project concerns by the communities								
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