

**Charity Projects and Spark MicroGrants
Rwanda: Advancing Citizen Engagement
(ACE) Project (P172862)**

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

April 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Charity Projects will and will cause Spark Microgrants to implement the Advancing Citizen Engagement Project (hereafter the Project), with the involvement of the Ministry of Local Government, Local Administrative Entities Development Agency, and the Ministry of Economy and Finance. The International Bank for Reconstruction and Development and the International Development Association (hereafter the Bank) has agreed to administer project financing, provided by the Japanese Social Development Fund.
2. Charity Projects will and will cause Spark MicroGrants to implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, and the timing for each of these.
3. Charity Projects will and will cause Spark MicroGrants to comply will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), and Stakeholder Engagement Plans (SEP) as applicable, and the timelines specified in those E&S documents.
4. Charity Projects and Spark MicroGrants are responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above, or by communities in target villages.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by Charity Projects and Spark MicroGrants as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and Charity Projects, this ESCP may be revised during Project implementation to reflect adaptive management of the Project to changes and unforeseen circumstances, or in response to the assessment of Project performance conducted under the ESCP itself. In such circumstances, Charity Projects will agree to the changes with the Bank and will cause Spark MicroGrants to update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and Charity Projects. Charity Projects will cause Spark MicroGrants to promptly redisclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, Charity Projects shall provide additional funds, if needed, to implement actions and measures to address the following risks and impacts. Inadequate or incomplete subproject ESMPs, insufficient or inadequately trained E&S staff, in response to risks such as gender-based violence, health and safety risks, water and soil quality degradation, or the spread of human and/or animal diseases.

RWANDA ADVANCING CITIZEN ENGAGEMENT (ACE) PROJECT (P172862)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN, November 18, 2020

SUMMARY OF MATERIAL MEASURES AND ACTIONS TO MITIGATE THE PROJECT'S POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACT		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY	DATE OF COMPLETION
MONITORING AND REPORTING				
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank and Comic Relief regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to;</p> <ul style="list-style-type: none"> - the implementation of the ESCP - status of preparation and implementation of E&S documents required under the ESCP - Stakeholder engagement activities - Functioning of the grievance mechanism(s), and any grievances since the last reporting period; - Village sub-project risk screening and; - any accidents or incidents since the last reporting period <p>More elaborated aspects of monitoring and reporting are provided in the Project's ESMF and SEP, and further guidance will be articulated in the site specific ESIA/ESMPs for ECEP subprojects.</p>	<p>Quarterly (every 3 months) reports submitted to the Bank and Charity Projects, throughout the Project implementation.</p>	<p>Charity Projects and Spark Microgrants Monitoring costs to be covered under the Project management</p>	<p>Throughout the Project implementation</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank, Charity Projects, and appropriate GoR authorities of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers.</p> <p>This includes but is not limited to;</p> <ul style="list-style-type: none"> • Fatalities • materialization of significant risks on subproject sites • discovery of serious social harm associated with the project. • Any allegations that staff, volunteers or operations funded by Charity Projects have resulted in the risk of harm, abuse or exploitation of anyone connected with the Project • Any allegations relating to Spark's Trustees or other senior staff members who have a significant influence over the culture and operations of Spark • Any allegations related to Spark which is likely to lead to adverse publicity, irrespective of the individual's role 	<p>Notify the Bank, Charity Projects, and appropriate GoR authorities within 48 hours after learning of the incident or accident.</p> <p>A report would be provided within a timeframe acceptable to the Bank and Charity Projects, as requested</p>	<p>Spark Microgrants</p>	<p>Throughout the Project implementation</p>

	<ul style="list-style-type: none"> Allegations of harm, abuse or misconduct which have resulted in an internal investigation and/or referral to a relevant authority such as social services, the police or regulatory body Any serious breach or failure in safeguarding procedures or policies which have created the risk of harm, abuse or exploitation and/or have resulted in a referral to any regulatory body or relevant authority such as social services or the police. <p>Sufficient detail regarding the incident or accident will be provided, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor, community, or supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>			
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS				
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks. Maintain Spark Microgrants' three key staff (the M&E Specialist, the Project Director and the Country Director) to take prime responsibility for ESSs compliance. Spark Microgrants will train up existing staff to handle the ESSs risks management responsibilities as well. Recruit one (1) position in the RELM team specifically for GRM/ESSs compliance. SPARK Microgrants shall also recruit a short-term consultant to train and assist Spark team and communities on environmental and social management during project identification, environmental screening and preparation of ESSs instruments.</p>	<p>The staff are already in place and be ready to support in the implementation when the project commences</p> <p>Additional environmental and social risks management staff and systems are in place before project effectiveness (by December 31, 2020) and will be maintained throughout Project implementation.</p>	<p>Spark Microgrants</p> <p>Funding from the Project management</p>	<p>Throughout Project implementation</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Disclose the ESMF prior to project appraisal, and redisclose the updated version prior to negotiations</p> <p>Consistent with the Project's ESMF, screen any proposed sub-project, and, thereafter, draft, adopt, and implement the sub-project ESMP as required, in a manner acceptable to the Bank. The subproject that require ESIA's to be prepared will not be funded under this project.</p>	<p>Disclose the ESMF by November 20, 2020 Redisclose the updated ESMF by December 30, 2020</p> <p>All village subprojects will be screened and categorized prior to being approved for financing.</p>	<p>Charity Projects and Spark Microgrants</p> <p>Financing from the Project management</p>	<p>Prior to project appraisal Prior to negotiations</p> <p>Throughout the project implementation</p>

		<p>ESMPs for CDD subprojects will be prepared as needed, prior to sub-projects approval for financing.</p> <p>The approved ESMPs will be implemented and monitored throughout the project implementation</p>		
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Consistent with the Project’s ESSs, there will be development and implementation of management tools and instruments based on the particularity of each site considering existing environmental and social features. Once prepared, the tools and instruments/plans will be cleared prior to subproject approval for financing, throughout Project implementation. Accordingly, the following tools will be developed/implemented:</p> <ul style="list-style-type: none"> • Grievance Redress Mechanism; • GBV Action Plan • OHS management <p>Site specific ESMPs will be reviewed and approved by both national regulatory authority (RDB) and the Bank.</p>	<p>Prior to subproject approval for financing by Spark Microgrants.</p>	<p>Charity Projects and Spark Microgrants</p> <p>Financing from the Project management</p>	<p>Throughout the project implementation</p>
1.4	<p>CAPACITY SUPPORT (TRAINING)</p> <p>Undertake a comprehensive training needs assessment and develop a timebound training plan for Project staff.</p> <p>Provide training on an ongoing basis for project implementation team on E&S risks and impacts management, including meaningful stakeholders engagement, inclusion, grievance redress mechanism, monitoring and reporting ,and other relevant areas related to this project as per the training plan.</p>	<p>By January 31st 2021</p> <p>Once per year (first round: by February 28th 2021)</p>	<p>Spark Microgrants</p> <p>Financing from the Project management</p>	<p>90 days after project effectiveness</p> <p>Throughout the project implementation</p>
1.5	<p>PROJECT IMPLEMENTATION MANUAL</p> <p>Prepare project implementation manual, including ESSs management</p>	<p>By December 31, 2020</p>	<p>Charity Projects and Spark Microgrants</p> <p>Financing from the Project management</p>	<p>Before project effectiveness</p>
1.6	<p>SUB-GRANTEES AGREEMENT</p> <p>Spark Microgrants to prepare and sign agreements with subgrantees and provide support for implementation.</p>	<p>Before the commencement of the subproject activities</p>	<p>Spark Microgrants, Subgrantees</p> <p>Financing from the Project management</p>	<p>Throughout the project implementation</p>

1.7	<p>TECHNICAL ASSISTANCE/CAPACITY BUILDING</p> <p>Key activities under Components 1 (Village and Local Government Capacity Building), 3 (National Framework for Participatory Village Planning) and 4 Project Management, M&E, and Knowledge Dissemination) of the Project shall be undertaken pursuant to terms of reference (ToR) acceptable to the Bank and duly incorporate and take into consideration the requirements of the WB's ESSs and the GoR's environmental and social policies and legal frameworks.</p>	Obtain prior ToRs review and clearance by the Bank throughout the Project implementation	Spark Microgrants	Throughout Project implementation.
ESS 2: LABOR AND WORKING CONDITIONS				
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Labor Management Procedures (LMP) will be prepared by Spark Microgrant, consulted upon and disclosed, adopted and implemented.</p> <p>The LMP will comply with the Rwanda Labor laws and ESS2, include Occupational Health and Safety (OHS) guidelines, clarification of the minimum age and the project's commitment against child labor and forced labor, commitment to non-discrimination and inclusion of a worker's GRM in the LMP for Sparks Microgrants project staff, and community workers on subprojects, which will be included in the relevant terms of reference for staff and consultants contracted for the ACE Project.</p>	The LMP will be prepared, consulted upon and disclosed within 90 days after project effectiveness	Spark Microgrants Financing from the Project management	90 Days after project effectiveness
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior to engaging Project staff and maintained throughout Project implementation.	Charity Projects and Spark Microgrants Financing from the Project management	Throughout the project implementation
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Consistent with the Project's ESMF and ESS3, and GoR's requirements, resource efficiency and pollution prevention and management measures will be covered under the ESMPs to be prepared under action 1.2 above, as and when required for selected village CDD subprojects.</p>	Same timeframe as for the preparation and implementation of the ESMPs	Charity Projects and Spark Microgrants	Throughout the project implementation
ESS 4: COMMUNITY HEALTH AND SAFETY [
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Consistent with the Project's ESMF and ESS4, and GoR's requirements, adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs for CDD subprojects to be developed under action 1.2 above.</p>	Same timeframe as for the preparation and implementation of the ESMPs	Charity Projects and Spark Microgrants	Throughout the project implementation

4.2	COMMUNITY HEALTH AND SAFETY Consistent with the Project's ESMF and ESS4, and GoR's requirements, prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities including, behavior of Project workers, or risks of disease transmission, and include these measures in the ESMPs as required under activity 1.2 above, in a manner acceptable to the Bank.	Same timeframe as for the preparation and implementation of the ESMPs	Charity Projects and Spark Microgrants	Throughout the project implementation
4.3	GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).	Same timeframe as for the preparation and implementation of the ESMPs	Charity Projects and Spark Microgrants	Throughout the project implementation
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT				
	N/A as the project will not fund microgrant activities requiring land acquisition, restrictions on land use or involuntary resettlement.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
6.1	BIODIVERSITY RISKS AND IMPACTS: Consistent with the Project's ESMF and ESS6, and GoR's requirements, adopt and implement measures and actions to assess and manage threats to biodiversity as required in the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs	Charity Projects and Spark Microgrants	Throughout the project implementation
ESS7				
	N/A as there are no local communities as defined by ESS7 present in the potential project areas.			
ESS 8: CULTURAL HERITAGE				
8.1	CULTURAL HERITAGE RISKS AND IMPACTS: Consistent with the Project's ESMF and ESS8, and GoR's requirements, adopt and implement measures and actions, including chance finds procedure, to assess and manage threats to cultural heritage sites or values as required in the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs	Charity Projects and Spark Microgrants	Throughout the project implementation
ESS 9: FINANCIAL INTERMEDIARIES				
	N/A as Spark MicroGrants is an international non-government organization.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE				
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Update, adopt, and implement Stakeholder Engagement Plan (SEP).	At mid-term review	Charity Projects and Spark Microgrants	At mid-term review

10.2	PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.	Within 60 days after project effectiveness .	Charity Projects and Spark Microgrants	Throughout the project implementation
CAPACITY SUPPORT (TRAINING)				
CS1	Provide training for village-based FCAP Leadership Committees, CBFs, and SEDOs on GRM mechanism and overall E&S risks assessment and management approach. Provide specific training for CBFs on subproject E&S risk screening tools.	Within 90 days of project start	Spark Microgrants	90 days after project effectiveness
CS2	Conduct a comprehensive training needs assessment and develop a training strategy plan, on ESMF implementation and E&S RIM responsibilities.	Prior to project start.	Spark Microgrants	
CS3	Provide training for project staff on ESMF implementation and E&S RIM responsibilities and tools, specifically including: <ul style="list-style-type: none"> - GRM - Stakeholder management - Village subproject E&S risk screening - Incident reporting - E&S monitoring and reporting 	Within 90 days of the project start.	Spark Microgrants	Throughout the project implementation