MTİT

وزارة الاتصالات وتكنولوجيا المعلومات
Ministry of Telecom. & Information Technology

MINISTRY OF TELECOMMUNICATIONS AND INFORMATION TECHNOLOGY

ENVIRONMENTAL & SOCIAL MANAGEMENT FRAMEWORK (ESMF)

FOR

TECHNOLOGY FOR YOUTH AND JOBS(TechStart)
Project ID no: P172571

And

ADDITIONAL FINANCING
Project ID no: P180570

Prepared by: Ministry of Telecom and Information Technology

January 2023

TABLE OF CONTENTS

Contents

List of Tables

ACRONYMS

AF	Additional Financing
CAE	Child Abuse/Exploitation
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EMCA	Environmental Management Act - 1996
EQA	Environmental Quality Authority
ERP	Emergency Response Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESO	Environmental and Social Officer
ESSF	Environmental and Social Screening Form
ESSs	Environmental and Social Standards
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
IEE	Initial Environmental Evaluation
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MTIT	Ministry of Telecom and Information Technology
MoH	Ministry of Health
OHS	Occupational Health and Safety
PA	Palestinian Authority
PEAP	Palestinian Environmental Assessment Policy
PIA	Project Implementing Agency
PNA	Palestinian National Authority
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SHE	Safety, Health & Environment
TechStart	Technology for Jobs
SMEs	Small and Medium Enterprises

EXECUTIVE SUMMARY

This ESMF is a combined ESMF of the parent project as well as the Additional Financing (AF) for the Technology for Youth and Jobs Project (TechStart). The ESMF is developed by Ministry of Telecommunications and Information Technology (MTIT) to manage risks under TechStart Project. The Palestinian Authority (PA) considered selecting competitively private sector entity to act as Project Implementation Agency (PIA), who will be responsible for implementing the TechStart project on behalf of MTIT.

Objectives of the Environmental and Social Management Framework

The Environmental and Social Management Framework (ESMF) seeks to provide an effective environmental and social screening process for application in the TechsStartsubprojects. Specifically, the following are the objectives of the ESMF:

- To ensure that all subprojects are screened for potential adverse environmental and social impacts and risks, and appropriate mitigation and monitoring measures, including cost estimates, are identified and implemented by environmental and social expert;
- To support Project Implementation Agency (PIA) to carry out the environmental and social screening process as outlined in this Framework and provide guidelines to prepare the mitigation plans, including the implementation and monitoring of mitigation measures of all subprojects as necessary.

Project description - Parent Project

The Technology for Youth and Jobs Project (TechStart) aim to increase economic opportunities for IT service firms in the West Bank and Gaza. The project aims to shift the dynamic equilibrium of the Palestinian IT sector toward one of continuous upgrading of firm capabilities and employment growth. This project operation, as designed for the parent project, included four components tackling the supply side, the enabling ecosystem, and the demand side of IT services, as the following:

- Component 1 focuses on the supply side, seeking to improve the capabilities of IT service firms by supporting the technological and managerial upgrading of firms, including the upskilling of graduates and supporting the role of women in the IT sector.

- Component 2 focuses on improving the IT ecosystem by investing in (a) Research &Development facilities which can provide access to technology and services to the entire sector, (b) IT and office infrastructure for businesses who face the most market distortions from trade barriers, and (c) new business service providers.

- Component 3 focuses on connecting Palestinian IT services sector with regional and global markets and supporting business partnerships and investments through activities that increase awareness of the Palestinian value proposition and opportunities.

- Component 4 provides project management and monitoring. The proposed additional financing will allow the team to scale up its support to the Palestinian IT sector through the existing components of the project.

Additional Financing and Restructuring

The proposed AF includes an additional financing amount of US$ 15,55 million in addition to a level two restructuring due to the extension of the parent project closing date to October 30, 2027 and change in the targets of the results indicators. All components of the project will be scaled up, respectively: a) Component 1 "Improving IT service capabilities", Component 2 "Improving the IT services ecosystem", Component 3 "Improving market access and increasing demand and investments" and Component 4 "Project Management". No changes to project components are envisioned with the AF.

Legal Framework

The Palestinian national legislation does not include procedures for screening smalle-scale investments for potential adverse environmental and social impacts. To close this gap between national legislation and the Bank's ESF which requires that all investments proposed for Bank-financing are screened against the 10 Environmental and Social Standards (ESSs) for potential adverse environmental and social impacts, and appropriate environmental instruments be prepared.

The ten Environmental and social standards (ESS's) are:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts.
- ESS2: Labor and Working Conditions.

- ESS3: Resource Efficiency and Pollution Prevention and Management.
- ESS4: Community Health and Safety.
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.
- ESS8: Cultural Heritage.
- ESS9: Financial Intermediaries.
- ESS10: Stakeholder Engagement and Information Disclosure.

A full list and details of World Bank environmental and social standards can be found in the following link: http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf.

Capacity Building for PIA for the parent project

PIA should have Safety, Health and Environment (SHE) department or environmental and social expert. Therefore, an environmental and social officer (ESO) was hired by the Parent project through the Project Implementation Agency (PIA) . The ESO had already taken several trainings in environmental and social management systems and impact assessment, implementation of the environmental and social screening process outlined in this ESMF, e- management as part of capacity building.

Capacity building for the AF
The ESO will be involved in the implementation of the environmental screening process for subprojects and monitor the environmental and social requirements in both the parent and Additional Financing. The subproject that require screening are mainly related to component 2 and 3 of the Project. Capacity building is an ongoing activity, therefore, other trainings may be needed for the PIA (ESO)_in different aspects and standards that apply to the AF.

Screening Process
The environmental and social screening process described in chapter 4 outlines the institutional responsibilities for the implementation of each step (steps 1-7). The Environmental and Social Screening Form (Annex 1) will be prepared and availed to facilitate the identification of mitigation measures for subprojects. Main features of the screening form will include; a detailed description of the activities to be undertaken, potential negative effects (environmental and social concerns), mitigation measures to be undertaken and the organization/person responsible for each activity, and monitoring responsibilities.

Environmental and Social Risks

The environmental risks associated with the parent and AF are the same. The project environmental risk classification is "moderate". The risks are mainly associated with the expected increased number of IT equipment, and therefore increase of e-waste. The inappropriate management of this e-waste could cause serious health problems for workers, the surrounding community and the environment. DAI developed an E- Waste Management plan (approved by

the Bank in August 2021) that was implemented and adopted by all project beneficiaries throughout project implementation. DAI has recruited a part-time ESO, who is responsible of managing and supervising the parent project's overall E&S aspects and will continue to support the AF. The PIA is in compliance with the ESCP requirements during the reporting periods of the parent project. The environmental risk management performance rating of the PIA has been satisfactory throughout the implementation of parent project.

The social risks for the parent project and AF are the same. The project social risk classification is "moderate". The social risks are limited in nature and scale, and can be summarized as follows: (1) risks related to social exclusion in its various forms that would need to be mitigated by ensuring that project benefits, such as grants and job opportunities, can be accessed by and optimized for the most vulnerable, women and youth, including those from poor communities, (2) risk of exposure of youth, including vulnerable youth, and women to GBV/SEA/SH and/or poor working conditions, (3) risks related to working conditions for workers and beneficiaries (including OHS risks related to COVID-19), and (4) risks related to data privacy. The project will not result in any risks related to involuntary resettlement. Private sector firms seeking grants to establish new enterprises or subsidiaries will need to demonstrate adherence to willing-buyer willing-seller criteria to qualify. Summary of the environmental and social risks and mitigation measures is provided in the following table.

Table 1: Environmental and Social Risk identification and Mitigation Measures

Issue	Likely Impact	Mitigation
Economic impact and livelihoods	Help stabilize electricity supply to benefiting companies, thus revitalizing businesses	• Ensure fair competition by ensuring equal opportunity • Apply SEF including: • Ensure access to information and transparency in decisions • Undertake public consultation and information dissemination • Establish and create awareness on grievance redress mechanism
Social exclusion or inequity	Could arise from fairness and equity in decision making	• Ensure fair competition by creating a level playing field • Ensure access to information and transparency in decisions • Undertake public consultation and information dissemination • Establish and create awareness on grievance redress mechanism
Labor and working conditions	• Indiscriminate Human Resources Policies and Procedures; • Indiscriminate Working Hours and Leave; • Indiscriminate Wages	• Labor Management Procedures (LMP) was prepared to address the labor related issues

Issue	Likely Impact	Mitigation
	and Benefits; • Non-Discrimination and Equal Opportunities; • Grievances; • Child Labor; • Forced labor. • OHS risk related to COVID-19	• The Project will ensure the application of OHS measures related to COVID-19 as outlined in the Government of Palestine and WHO guidelines such as the procedures for protection workers in relation to infection control precautions and provision of immediate and ongoing training on the procedures to all categories of workers. Additionally, the Project will be mandating hand hygiene and personal protective equipment (PPE); ensuring adequate and free of charge supplies of PPE (particularly facemask, gowns, gloves, handwashing soap and sanitizer); and overall ensuring adequate OHS protections in accordance with the measures prescribed by Government of Palestine and the latest guidance by WHO as it develops over time and experience addressing COVID-19 globally.
e-waste disposal	• Chemical contamination of soil and ground water from poor disposal of e-waste.	• Prepare e-waste management plan. • Dispose e-waste at approved waste management sites using registered transport services and disposal site. • Do not treat e-waste as domestic waste (in terms of disposal methods). • Contract with recycling facility capable of handling e-wastes.

After environmental and social screening, mitigation measures will be identified for each negative impact identified during the screening process – with a particular focus on the worker' occupational health and safety, disposal of e-waste, social exclusion or inequity and labor conditions. The Mitigation measures will be implemented by the IT beneficiaries with monitoring done by the ESO at PIA.

Environmental and Social Management Plan
For sub-projects for which an ESMP is deemed necessary (given that all subprojects under the parent project did not need ESMP's) following the screening, the Bank's specialists will also agree to the same and an ESMP will be prepared, and the level of detail required in ESMPs will also be based on the level of sub-project E&S risks.

A generic ESMP is prepared based on the potential risks and impacts associated with subprojects. The generic ESMP provides in addition to the potential impacts the required mitigation measures, institutional responsibilities and recommended monitoring activities and their frequency. In general, the responsible parties for implementation of mitigation measures and monitoring will be the IT suppliers (Contractor), ESO at PIA, and MTIT as well as EQA. While the main responsible parties during operations will be the beneficiaries/subproject owners, including the monitoring responsibility of MTIT as well as EQA for e-waste disposal. Detailed ESMP for different project phases is provided in Chapter 7 of this report.

The generic ESMP will be adjusted/updated, where required, based on the findings of the screening process of subproject, where the relevant assessment / mitigation plans will be prepared accordingly.

Environmental and Social Monitoring
Environmental monitoring needs to be carried out continuously during the implementation and operation of sub-projects in order to measure the success of the recommended mitigation measures. Monitoring activities will be carried out by ESO at PIA. Any changes in monitoring parameters must have the approval of the ESO at PIA and the World Bank Team.

Stakeholder Engagement
Stakeholder engagement is critical in preparing effective and sustainable subprojects activities. This requirement supports the participatory planning process as required by the World Bank and the Palestinian Environmental Assessment Policy (PEAP). It is important that beneficiaries are involved in the project cycle, from the screening to implementation and monitoring. The same applies to relevant stakeholders.

For each subproject, the first step is to hold consultations with interested/affected parties during the subproject screening process. Consultations with all stakeholders will be conducted according to the SEP which is prepared in a stand-alone document for the project.

Once the subproject has been selected based on criteria for developing grant proposals and the screening process has been completed, the PIA will conduct consultations with stakeholders about the results and identify key issues and determine how the concerns of affected or interested individual or group will be addressed in the ESMP.

PIA and MTIT disclosed on their websites (Techstart.ps) and (http://www.mtit.pna.ps) respectively, project information for the parent project and all key documentation, including the original ESMF, LMP, and SEF to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. Public consultations are critical in preparing effective and sustainable subprojects activities. This requirement supports the participatory planning process as required by the World Bank and the Palestinian Environmental Assessment Policy (PEAP). It is important that beneficiaries are involved in the project cycle, from the screening to implementation and monitoring. The same applies to relevant stakeholders.

During project implementation (Sep, 2022), the SEF for the parent project was updated and converted to SEP to reflect the updates in project implementation and stakeholder engagement activities since project's effectiveness. The revised SEP was submitted for World

Bank final clearance on Sep 20, 2022, and was not disclosed. During the 3rd quarter (November 2022), preparations have been initiated for an Additional Financing for the Technology for Youth and Jobs Project (TechStart). This included the final update of the SEP (which was disclosed on December 14, 2022) and the update of other project's environmental and social (E&S) instruments of the parent project to reflect the AF.

CHAPTER ONE: INTRODUCTION

1.1 Background

1. The objective of this Environmental and Social Management Framework (ESMF) is to ensure that the project's software and hardware activities including installation of IT facilities are designed and implemented in an environmentally and socially sustainable manner, taking into account Palestinian's relevant sector legislation as well as the World Bank' Environmental and Social Framework (ESF).

2. This ESMF is prepared for the parent project and AF. The proposed AF includes an additional financing amount of US$ 15,55 million in addition to a level two restructuring due to the extension of the parent project closing date to October 30, 2027 and change in the targets of the results indicators. All components of the project will be scaled up, respectively: a) Component 1 "Improving IT service capabilities", Component 2 "Improving the IT services ecosystem", Component 3 "Improving market access and increasing demand and investments" and Component 4 "Project Management". No changes to parent project components are envisioned.

3. During the 3rd quarter of 2022, preparations have been initiated for an Additional Financing for the Technology for Youth and Jobs Project (TechStart)., herein referred to as the (Additional Financing). This includes the update of the ESMF and the other project's environmental and social (E&S) instruments of the parent project. Therefore, this updated version of the ESMF (November December, 2022) has been prepared in line with the Additional Financing, to scale up activities and provide support to the Palestinian IT sector through the existing components of the project.

4. ESMF is developed by Ministry of Telecommunications and Information Technology (MTIT) to manage risks under the Technology for Youth and Jobs (TechStart) called hereafter (the parent project and the Additional Financing). International Bank for Reconstruction and Development/International Development Association called hereinafter (the Association) has agreed to provide financing for the Project. The Palestinian Authority (PA) has contracted DAI, a private sector entity, to act as Project Implementation Agency (PIA) who will be responsible for implementing the TechStart project on behalf of MTIT. PIA will be responsible for following up the implementation of the environmental and social considerations and mitigation measures stated in the ESMF.

5. PIA will be responsible through qualified environmental and social expert for completing the Environmental and Social Screening Form prepared in this ESMF, and based on the screening results, appropriate update of the generic Environmental and Social Plan (ESMP) which is also prepared in this ESMF will be carried out. The screening process has been developed because the locations and the exact type of interventions are not known prior to the project appraisal, and therefore potential adverse localized environmental and social impacts cannot be precisely identified. Furthermore, Palestinian's environmental legislation does not have provisions for the environmental and social screening of small-scale projects, such as supply of computers, cloud, and office ergonomics included in the TechStart Project, whereas the World Bank's ESF requires that all projects are screened for potential adverse environmental and social impacts to determine the appropriate mitigation measures.

1.2 Level of Environmental Work

6. The appropriate level of environmental work could range from the application of simple mitigation measures (using the Environmental and Social Checklist for sub projects with limited adverse impacts; to the preparation of updated ESMP Report; to no environmental work being required. The environmental and social screening process is consistent with Palestinian's environmental policies and laws, as well as with the World Bank's ESF.

7. It is expected that the project will have limited negative environmental impacts. However, potential adverse social impacts that would require proper mitigation might occur. The Environmental and Social Screening Form will enable project implementing agency (PIA) to identify, assess and mitigate potential negative environmental impacts; and to ensure proper mitigations.

1.3 Coordination with Environmental Quality Authority

8. It is important during the implementation to coordinate with EQA to ensure that the investments are consistent with the Palestinian Environmental Assessment Policy (PEAP). This will be achieved by ensuring the involvement of the EQA Regional Environmental Office in the evaluation of environmental impacts, preparing the updated ESMP, and during implementation of subprojects.

1.4 Preparation and Use of this Framework

9. ESMF approach is selected because the TechStart project consists of series of activities, and the risks and impacts cannot be determined until the subproject details have been identified. The ESMF provides a guide to be used in accordance to Palestinian's environmental assessment policy and the World Bank' ESF. This ESMF will be a living document that will be subject to periodic review to address specific concerns raised by stakeholders.

10. This Environmental and Social Screening Process is to be used by PIA responsible for planning, implementation, management of TechStart subprojects. As a reference material, the process could be useful by other Ministries/Authorities and Non-governmental organizations involved in similar projects.

1.5 Lessons learnt and challenges during ESMF implementing for the parent project

11. The parent project witnessed some challenges in implementing ESS2, since there are key gaps between ESS2 and National Labor Law, which included:

- The West Bank and Gaza, as designated occupied territories, are unable to be a member of the ILO, and as such they have not ratified any ILO Conventions.

- Not all labor laws are fully aligned with ESS2. Important areas for consideration relate to:

- Forced labor: Forced, involuntary, bonded labor etc. are not addressed by the Labor Law No. 7 of 2000. There is no specific provision in national legislation punishing the exaction of forced labor.
- Discrimination: Gender discrimination in the different aspects of the employment relationship, including in recruitment, promotion and terms and conditions of employment, is not expressly prohibited. Discrimination against a number of personal characteristics is not expressly prohibited under the Labor Code, including race, political belief, language, sexual orientation or gender identity. Sexual harassment is not expressly prohibited by law.
- Contracted and primary supply labor: National law does not contain specific requirements on the use of contracted labor or on the use of primary supply labor.

Lessons learnt: as an essential mitigation measure to address the gaps in the Palestinian National Labor law regarding labor dispute issues and to provide the workers with a non-judicial procedure, the parent project has established a Workers' Grievance Mechanism under the parent project which will be used in the AF.

1.6 Organization of the Framework

12. The Framework is organized as follows:

Chapter 1 provides the introduction to the Framework;

Chapter 2 presents the legal framework;

Chapter 3 presents a summary of the TechStart project including the E&S contextual information of the project area;

Chapter 4 describes the potential environmental and social impacts of the Project;

Chapter 5 describes the proposed environmental and social mitigation measures;

Chapter 6 presents the environmental and social screening process for projects;

Chapter 7 presents the stakeholder engagement and public consultation process carried out during the preparation of the ESMF and summarizes the outcomes;

Chapter 8 indicates environmental indicators how environmental and social monitoring will be conducted;

Chapter 9 provides the institutional setup for environmental and social monitoring and capacity building and training at PIA and MTIT to ensure efficient implementation of the ESMF.

CHAPTER TWO: THE LEGAL FRAMEWORK
2.1   Palestinian Legislation Relevant to the Implementation of the TechStart project

13. The proposed TechStart Project will be implemented in compliance with applicable environmental laws and regulations. Palestine has an environmental assessment Policy that is applicable to the proposed project. In addition, a wide range of laws and regulations related to environmental issues are in place in Palestine. Many of these are cross-sectoral and partially related to the Project activities. This chapter presents an overview of the major national environmental laws and regulations that are relevant and may apply to activities supported by the project, and World Bank's ESF.

2.2   Institutional Framework
14. At present EQA is the main Authority which responsible for environmental issues in Palestine.

2.3   Environmental Legal Framework

2.3.1   The Palestinian Environmental Law
15. The Palestinian Environmental Law (PEL) No. 7 of 1999 was developed by the Environment Quality Authority (EQA), to protect environmental resources, including land environment; air environment; water resources and aquatic environment; and natural, archaeological and historical heritage. According to the PEL, the protection of these resources shall be addressed in all social and economic development plans in view of sustainable development and protection of the rights of future generations.

16. The core issues of concern in the PEL are the protection of public health and social welfare, as well as the conservation of ecologically sensitive areas, biodiversity and rehabilitation of environmentally damaged areas. The PEL also sets penalties for violating any article presented under this law. The main objectives of the PEL include the following: (i) Protecting the environment from pollution, (ii) protecting public health and social welfare, (iii) incorporating environmental resources protection in all social and economic development plans and promoting sustainable development to protect the rights of future generations, (iv) conserving ecologically sensitive areas, protecting biodiversity, and rehabilitating environmentally damaged areas, (v) establishing inter-ministerial cooperation, (vi) promoting environmental information collection and publication, (vii) promoting public awareness, education and training.

17. Article 8 of this law reads, "The competent authorities, consistent with their respective specialization, shall encourage undertaking appropriate measures to reduce the generations of solid waste or any other hazardous waste to the lowest level possible, and to the best extent possible, shall encourage solid waste treatment, recycling or processing".

18. In accordance with Article 12, and 13, the disposal of any hazardous substance or waste should not be done, unless such a process is conform with the terms, regulations, instructions and norms specified by EQA, in coordination with specialized agencies. Moreover, Article 47, EQA, in coordination with appropriate authorities, is responsible for determining projects that require environmental approvals prior to licensing. The current project is bounded with Article 47.

2.3.2 The Palestinian Environmental Assessment Policy (PEAP)

19. The Palestinian Environmental Assessment Policy (PEAP) was approved by decree No: 27- 23/4/2000. It supports the sustainable economic and social development of the Palestinian people. Specifically, the PEAP objectives are to: (i) ensure an adequate quality of life in all aspects, and ensure that the basic needs and social, cultural, and historical values of the people are not negatively impacted as a result of development activities, (ii) preserve the capacity of the natural environment, (iii) conserve biodiversity and landscape, and promote the sustainable use of natural resources, (iv) avoid irreversible environmental damage, and minimize reversible environmental damage from development activities.

20. Under the PEAP, proponents of public and private projects are required to submit an Application for Environmental Approval that informs the EQA and relevant approving authorities of the intended project activities. Subsequently, a determination is made whether an Initial Environmental Evaluation (IEE) or a detailed EA is required. If neither an IEE nor EA report is required, the EQA, in coordination with the EA Committee, will determine if an Environmental Approval will be granted and, if so, under what conditions.

2.4 World Bank Environmental and Social Framework/ESSs

21. The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. There are ten Environmental and social standards (ESS's), these are:
- ESS1: Assessment and Management of Environmental and Social Risks and Impacts.
- ESS2: Labor and Working Conditions.
- ESS3: Resource Efficiency and Pollution Prevention and Management.
- ESS4: Community Health and Safety.
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.
- ESS8: Cultural Heritage.
- ESS9: Financial Intermediaries.
- ESS10: Stakeholder Engagement and Information Disclosure.

22. Full list and details of World Bank environmental and social standards can be found in the following link: http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf.

23. ESS1 and ESS10 applies to all projects supported by the Bank through Investment Project Financing. The Borrower will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation.

24. In line with ESS3, an e-waste management plan (Annex 5) was prepared and approved by the Bank for the project, which will be adopted and implemented by all beneficiaries (included in all grant agreements)

for safe management, recycling and disposal of redundant and obsolete electronic equipment.

25. The project will not result in any risks related to involuntary resettlement. Therefore, ESS5 is not applicable to the Project as business infrastructure subprojects will be carried out within the existing companies' premises. Private sector firms seeking grants to establish new enterprises or subsidiaries will need to demonstrate adherence to willing-buyer willing-seller criteria to qualify. Hence no land acquisition and resettlement will be required.

26. ESS6: is not Relevant.

27. ESS7 is not relevant to the project as there are no indigenous peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the area and Gaza in general.

28. ESS9 is also not applicable to the project as the project will not use financial intermediaries as an instrument for channeling funds to the beneficiary communities in the project area of influence.

29. In line with ESS1, MTIT updated the ESMF under the AF (this document) and a generic ESMP for Component 2 of the project (related to the supply side of IT facilities, providing grants and training activities. The updated ESMF for the AF will be disclosed after WB approval. In line with ESS2 and 4, MTIT has also updated the Labor management Procedures under the AF, which also will be disclosed after obtaining WB approval. Also to fulfill the requirements of ESS10, MTIT has updated the stakeholder engagement Plan (SEP) to reflect the AF and was disclosed in December 14, 2022.

CHAPTER THREE: THE TECHSTART PROJECT

3.1   Introduction

30. The proposed AF includes an additional financing for the same activities of the parent project amount of US$ 15,55 million in addition to a level two restructuring due to the extension of the parent project closing date to October 30, 2027 and change in the targets of the results indicators. All components of the project will be scaled up, respectively: a) Component 1 "Improving IT service capabilities", Component 2 "Improving the IT services ecosystem", Component 3 "Improving market access and increasing demand and investments" and Component 4 "Project Management". No changes to parent project components are envisioned.

31. The project will support the efforts of the Government of Palestine in private sector-driven development and job creation. TechStart Project aims for an IT outsourcing industry that has potential to spur growth and improve employment outcomes for youth. This project is particularly aligned with two areas of engagement from the Bank Group FY-18-21 Assistance Strategy (AS) for WB&G. By exposing young Palestinian engineers to advanced research and development work at multinational corporations (MNCs), industry-driven skills will be nurtured and sharpened through support of the project. At the same time, the project will help deepen linkages and business opportunities for the Palestinian ecosystem with the hubs of prominent MNCs.

32. The additional financing will scale up all existing components of the project. No additional geographical locations will be covered under the AF.

3.2   Project description - Parent Project

33. The Technology for Youth and Jobs Project (TechStart) and Additional Financing aim to increase economic opportunities for IT service firms in the West Bank and Gaza. The project aims to shift the dynamic equilibrium of the Palestinian IT sector toward one of continuous upgrading of firm capabilities and employment growth. This project operation, as designed for the parent project, included four components tackling the supply side, the enabling ecosystem, and the demand side of IT services.

- Component 1 focuses on the supply side, seeking to improve the capabilities of IT service firms by supporting the technological and managerial upgrading of firms, including the upskilling of graduates and supporting the role of women in the IT sector.

- Component 2 focuses on improving the IT ecosystem by investing in (a) Research &Development facilities which can provide access to technology and services to the entire sector, (b) IT and office infrastructure for businesses who face the most market distortions from trade barriers, and (c) new business service providers.

- Component 3 focuses on connecting Palestinian IT services sector with regional and global markets and supporting business partnerships and investments through activities that increase awareness of the Palestinian value proposition and opportunities.

- Component 4 provides project management and monitoring. The proposed additional financing will allow the team to scale up its support to the Palestinian IT sector through the existing components of the project.

No changes to project components are envisioned in the AF as presented below in Table 2.

Table2: Project components and sub-components and their direct beneficiaries for the AF

	Activities	Beneficiaries of Technical Assistance or Funding
1	Component 1: Improving IT service capabilities	
1.1	Human capital improvement stipends	Individuals and firms
1.2	Advisory services on managerial capabilities	Firms
1.3	IT and gender needs assessment and engagement	Individuals and firms
1.4	COVID-19 employment support subsidies	Individuals and firms
2	Component 2: Improving the IT services ecosystem	
2.1	Seed grants to stimulate private investments in the IT service ecosystem	Individuals and firms
2.2	Grants for shared R&D hubs	Firms
2.3	Grants for IT business infrastructure (focus on Gaza)	Firms
3	Component 3: Improving market access and increasing demand and investments	
3.1	Awareness raising and international market linkages	Firms
3.2	Promotion and facilitation of FDI in the Palestinian IT ecosystem	Firms
4	Component 4: Project management and implementation support	
4.1	Project management and monitoring; Technical assistance to MTIT	PIA

3.3 Environmental and Social contextual information of the project area

34. The project is covering both West Bank and Gaza. The AF activities will take place mainly in urban populated areas where the project beneficiaries, individuals and firms, are practicing their ICT business. The AF is not expected to include any civil works, except minor interior works for installation of IT networks, software, and other related equipment. PIA and the benefitting Palestinian IT Service Companies will hire new female and male employees to upskill their workforce. The employees/workers, either male or female, will be engaged according to the work needs. Most of the workers will be skilled labors including managers in IT companies, engineers, IT students, and equipment operators.

35. The project scope support under component 2.1 Seed grants to stimulate private investments in the IT service ecosystem, with expected increased number of IT equipment, and therefore increase of e-waste. The project will also allocate grants for IT infrastructures in component 2.3. The project will also support office facilities for improvements in office ergonomics. The social risks are due to risks related to social exclusion, risk of exposure of youth, including vulnerable youth and women to sexual harassment or exploitation, or poor working conditions, and risks related to labor and working conditions for project workers and beneficiaries. All sub-projects shall be subjected to environmental and social screening so as to determine its impacts and propose various mitigation measures on the impacts to be identified and implemented in compliance with the national environmental legislation as well as relevant and the World Bank's ESF.

36. The project component for funding rooftop solar panels, AC, and similar equipment was dropped from the project. However, solar systems can be implemented under other World Bank project namely **Electricity Sector Performance Improvement Project (ESPIP),** specifically under component 3. The environmental and social measures for the installation of solar panels and end of life wasted solar panels, batteries are spilled and detailed out in the environmental and social management framework of the ESPIP project.

37. To ensure compliance with the environmental and social requirements of the subprojects, the ESO at PMU should:
    - Ensure that proper appraisal of environmental and social effects of new interventions takes place and proper measures are put in place to mitigate these effects;
    - Set out the basis for compliance and enforcement of terms and conditions of approval of project plans;
    - Monitor compliance and management of environment and social issues;
    - Engage stakeholders who will be giving their views in regard to the environmental and social concerns.

    - The environmental and social screening process will be used at the planning stage of the sub-project to determine potential adverse environmental and social impacts. The ESO at PIA will fill the environmental and social screening form. Based on that, the ESO will determine the requisite environmental and social requirements/mitigation measures to be considered.

CHAPTER FOUR: THE ENVIRONMENTAL AND SOCIAL RISK SCREENING PROCESS FOR SUB-PROJECTS

4.1 Environmental and Social Screening in the Framework

38. The Environmental and Social Screening Process outlined in the ESMF provides mechanism to determine whether future sub-projects are likely to have potential negative environmental and social impacts; to determine appropriate mitigation measures for activities with potentially adverse impacts; to incorporate mitigation measures into sub- project design; to review and approve sub-project proposals; and to monitor environmental parameters during a sub-project's implementation. The extent of environmental and social works that might be required for sub-projects prior to commencement, if any, will depend on the outcome of the screening process described below. Environmental and social screening form in (Annex 1). This will be undertaken by qualified ESO at PIA. Application of the Screening processes

39. In November 2021, and in view of the fact that the project includes multiple small sub-projects of low to moderate E&S risk, the E&S screening, review, clearance and disclosure requirements for sub-projects/grants were revised by the Bank to make the process more efficient. Under this simplified approach, for low and moderate risk grant applications, requisite E&S mitigation measures (e.g. for e-waste management; OHS; labor management such as minimum age, workers' grievance redress, and prevention of sexual abuse and exploitation and sexual harassment) are included in the grant agreements, whereas sub-project ESMPs that need to be cleared by the Bank are not required. Environmental and Social Assessments (ESAs) of grants were conducted in accordance with the ESMF, SEP, LMP and relevant mitigation measures included in the grant agreements.

The new revised simplified approach (which will be applied to the AF) concluded the following:

- All sub projects with minimal or limited adverse impacts will not require further E&S assessment (e.g. preparation of ESMPs) beyond screening, and requisite risk mitigation measures will be included in bidding documents/grant agreements;
- ESMPs will be prepared only where screenings deem it necessary.
- For sub-projects for which an ESMP is deemed necessary following the screening, the level of detail required in ESMPs will also be based on the level of sub-project E&S risks.
- Bank review and clearance process for ESMPs for high and substantial risks subprojects, will remain the same, that is involving MNA ESF QAT review and PM clearance. All ESMPs will be disclosed in-country and on the Bank system.

The objective of this approach is to make the E&S assessment done by the PIA, and Bank review clearance and disclosure requirements more efficient, so that current bottlenecks in project implementation and disbursements may be removed and Bank support can be provided swiftly to address pressing development needs. At the same time, the proposed revised approach will continue to ensure compliance with the ESF.

40. Since the specific details and locations of the sub-projects that will be undertaken by PIA are not known at this time, an environmental and social screening process is proposed in this ESMF. The objectives of the screening process are to:

- Determine the potential adverse environmental and social impacts of the sub-project;
- Determine the appropriate environmental and social risk classification as per the environmental and social standards;
- Based on the environmental and social risk assessment and classification, determine the appropriate level of environmental work required (i.e. the application of simple mitigation measures (using the Environmental and Social Checklist); to the preparation of updated ESMP Report; to no environmental work being required. Determine appropriate mitigation measures for addressing adverse impacts using the Environmental and Social screening form (annex 1); this form can be adjusted to reflect sub-project-specific environmental and social management requirements;
- Determine the extent of potential solid waste generation and appropriate mitigation measures;
- Incorporate environmental mitigation measures as presented in the screening form into the proposed sub-project design;
- Determine whether community peoples are likely to be affected by the sub-project;
- Facilitate the review and approval of the screening results from the World Bank Team approval.

41. The following procedure will be followed for the selected subprojects.
- The first step in environmental assessment will be preliminary screening. The ESO at PIA will accomplish this task by completing the environmental and social screening form (annex 1) described in the ESMF. For sub-projects with moderate to low risks, or where there are limited environmental or social risks or impacts, no further E&S assessment will be required following the initial screening and the E&S management requirements will be identified and included in the grant agreements.
- The completed environmental and social screening form (annex 1 of the ESMF) is attached to the recommendation and submitted to the World Bank team for review and clearance prior to the commencement of the subproject. Screenings will be reviewed and cleared by the Bank.
- The environmental assessment will be undertaken in a participatory manner and the stakeholder consultations will be documented in the environmental assessment documents;
- The Environmental Guidelines for benefiting firms/individuals (annex 2) will be attached to the Request for Proposal (RFP)/bidding documents to ensure environmentally and socially sound construction practices.
- The World Bank Team will ensure that environmental concerns are addressed during planning, design, implementation and operations of the subprojects and appropriate mitigation measures are in place.
- If any screening report indicates a need for the preparation of a site-specific Environmental and Social Management Plan (ESMP), the Bank's specialists will agree to the same and an ESMP will be prepared.
- For sub-projects for which an ESMP is deemed necessary following the screening, the level of

detail required in ESMPs will also be based on the level of sub-project E&S risks.
- The ESMPs will also be disclosed in-country on the MTIT website.

42. Proposed sub-project selection, design, contracting, mitigation, monitoring and evaluation will be consistent with agreed process outlined in the ESMF and will be fully integrated into the Project Implementation Plan/Operations Manual and project cost tables.

43. The list of environmental and social requirements/measures to mitigate potential adverse impacts as per screening results, including terms and conditions, the ESMP (when deemed necessary), or the site specific measures (e.g. for e-waste management; OHS; labor management such as minimum age, workers' grievance redress, and prevention of sexual abuse and exploitation and sexual harassment) will be attached as a part of the grant agreements / contract specifications. A clause in the Particular Conditions of grants and Contracts will refer to the E&S management requirements for a sub-project. The Particular Conditions of Contract /agreement prepared by ESO at PIA based on the environmental and social management requirements will also stipulate that any non-compliance with the mitigation measures set out in the agreement / contract will attract the same remedies under the contract as any non-compliance with the contract provisions; such remedies would be instructions, notices, suspension of works, etc. The Instruction to Bidders will highlight the inclusion of the site-specific environmental and social Assessment (ESA) or screening results in the contract specifications and the contractor's obligation of compliance. The performance agreement will carry a clause to the effect that the recipient shall ensure the design, supply, operation and implementation of the sub-project are carried out in accordance with the ESMF. In addition Environmental Guidelines for benefiting firm/individual (Annex 2) will be implemented and monitored by the ESO at PIA.

4.3 The Screening Process
44. The purpose of this step is to identify the scale of the impacts and appropriate mitigation measures to determine the level of EA required for the project. The environmental risk associated with the project activities/subprojects is considered low and the social risk is moderate as indicated in section 6.2 below, therefore a social management plan will be required.

Prior to the commencement of sub-project the screening process described below will be carried out.

Step 1: Screening Of Sub-project Activities and Sites
Site visit will be carried out to the selected benefiting firm by the ESO at PIA to complete the Environmental and Social Screening Form (Annex 1).

The screening form, when correctly completed, will facilitate the identification of potential environmental and social impacts, the determination of risk classification and their significance, the determination of appropriate environmental and social mitigation measures.

To ensure that the screening form is completed correctly for the various sub-project activities, training should be provided to the benefiting IT company staff on Environment and social issues as part of strengthening their capacity.

Step 2: Assigning the Appropriate Environmental Risk classification

The environmental and social screening form, when completed, will provide information on the assignment of the appropriate environmental risk classification to a particular subproject.

The ESO at PIA will be responsible for assigning the appropriate environmental risk classification to the proposed sub-project with the requirements of WB ESF:

(a) High Risk classification: the proposed project is classified as of High Risk if it is likely to have significantly adverse environmental impacts. These impacts may affect an area broader than the sites or facilities subject to physical works. A full EIA is required. The EIA examines the project's potential negative and positive environmental impacts, compares them with those of feasible alternatives, including a no-action i.e. no-project alternative and also incorporates public consultations as per the national EIA regulation requirements. The EIA will recommend needed measures to prevent, minimize, mitigate or compensate for adverse impacts and help improve environmental performance. None of the sub-projects in the TechStart is expected to be within this risk category.

(b) Substantial Risk classification: A proposed project is classified as of Substantial Risk, if its potential adverse environmental impacts on human populations and environment are less adverse than those of High Risk Category. These impacts are site-specific; few if any of them are irreversible; and in most cases mitigation measures can be designed and implemented more readily than for high risk category projects.

(c) Moderate or low risk classification: A proposed project is classified as of moderate or Low Risk if it is likely to have minimal or no adverse environmental impacts. For projects with moderate impacts and limited scale/footprint, an ESMP will be required. Projects of low risks, simple mitigation measures in place such as checklist or no further environmental action are required for this classification.

Step 3: Carrying Out Environmental and Social Assessment

After reviewing the information provided in the environmental and social screening form, and having determined the appropriate environmental risk classification, ESO at PIA will determine the appropriate level of environmental work which could range from the application of simple mitigation measures (using the Environmental and Social Checklist); to the preparation of ESMP following the provisions outlined in the ESMF; to no environmental work being required. For sub-projects with moderate to low risks, or where there are limited environmental or social risks or impacts, no further E&S assessment will be required following the initial screening and the E&S management requirements will be identified and included in the grant agreements.

Step 4: Review and Approval of the Screening Activities

The results and recommendations presented in the environmental and social screening forms, the proposed mitigation measures presented in the environmental and social checklists, and the completed environmental and social plans will be reviewed and approved by the World Bank Team.

Step 5: Stakeholder engagement and Public Consultations

Stakeholder engagement and public consultation is a regulatory requirement to fulfill the

requirements of World Bank ESSs by which the public's input (and particularly the impacted, interested and vulnerable stakeholders) on matters affecting them is sought in regard to the subproject during planning, implementation and operation. Its main objectives will be improving the efficiency, transparency and public/stakeholders involvement in the sub-project. It will involve notification (to publicize the matter to be consulted on), consultation (a two-way flow of information and opinion exchange) as well as engagement of affected groups.

Step 6: Environmental and Social Monitoring
This describes the processes and activities that need to take place to characterize and monitor the environmental and social issues of the sub-project. The objectives for monitoring are to: (i) keep the record of environmental and social impacts resulting from the sub-project activities and to ensure implementation of the "mitigation measures" identified earlier, (ii) alert project implementation team by providing timely information about any recommended changes that deemed necessary; and (iii) evaluate whether the mitigation measures designed into the sub-projects have been successfully implemented.

Environmental and social monitoring needs to be carried out during the three phases of the sub-project implementation in order to measure the success of the recommended mitigation measures. Monitoring activities in site will be carried out by ESO at PIA. Any changes in monitoring parameters must have the approval of the ESO at PIA and the World Bank Team.

Pre-implementation Phase: subproject activities are subjected to environmental and social screening in conformity with the guidelines in the ESMF and specific subproject ESMP is prepared on time and incorporated into RFP/bidding documents.

Implementation Phase: ESO at PIA will conduct compliance monitoring, using the specific environmental and social measures relevant to, and prescribed for the activities as well as to assess general environmental and social management/performance. Report should contain information with regard to environmental and social compliance in accordance to the provisions of the contract. A monitoring plan should be prepared by the ESO at PIA.

Post-implementation Phase: ESO at PIA will prepare a summary report for the implementation effectiveness of all environmental and social mitigation measures and share it with MTIT, stakeholders, and with the World Bank. The following are some of the pertinent parameters and verifiable indicators that can be used to measure ESMF process, mitigation plans and performance.
- Are periodic monitoring reports being completed?
- Are processes defined in the ESMF working well?
- How many complaints/grievances have been received regarding the project?

End-of-life disposal of hazardous materials including e-waste should be monitored by the benefiting companies through: (i) transporting the hazardous materials using registered transport services, and (ii) ensuring that e-waste is disposed off at approved waste sites selected by EQA. An e-waste management plan (Annex 5) was prepared for the project and approved by the Bank, which will be adopted and implemented by all beneficiaries (attached to all grant agreements) for safe management, recycling and disposal of redundant and obsolete electronic equipment.

Step 7: Environmental and Social Monitoring Indicators
The environmental and social indicators that need to be monitored under the TechStart subprojects include: e-waste management, social exclusion or inequity, stakeholders' engagement as per the SEP, and labor and working conditions including the GM provision.

CHAPTER FIVE: STAKEHOLDER ENGAGEMENT

45. The SEF for the parent project was updated and converted to SEP to reflect the updates in project implementation and stakeholder engagement activities since project's effectiveness. The revised SEP was submitted for World Bank final clearance on Sep 20, 2022, and was not disclosed. During the 3rd quarter (November 2022), preparations have been initiated for an Additional Financing for the Technology for Youth and Jobs Project (TechStart). This included the final update of the SEP (which was disclosed on December 14, 2022) and the update of the other project's environmental and social (E&S) instruments of the parent project to reflect the AF.

Please refer to the disclosed SEP document under the AF (https://www.techstart.ps/en/Article/78/sep).

5.1 Rationale for Consultation and Disclosure

46. Public consultations are critical in preparing effective and sustainable sub-projects including not only the construction/installation activities but also all project components. This requirement supports the participatory planning process as required by the World Bank and the national environmental assessment regulations. It is important that beneficiaries are involved in the project cycle, from the screening process to implementation and monitoring. The same applies to relevant stakeholders.

47. The first step for subproject preparation is to hold consultations with the project's affected and interested parties during the screening process, when preparing the subproject ESMP.

Project-affected parties: there are two main categories for the project-affected parties, namely firms and individuals.

- Firms: This category of PAPs includes Palestinian IT services SMEs, startups and business service providers. IT services include software publishing; computer programming, consultancy and related activities; data processing, hosting and related activities.

- Individuals: This category of PAPs managers and owners of businesses located in the West Bank and Gaza and students, software engineers and IT professionals—many of which young, recent graduates, and Unemployed women computer science graduates

Other interested parties (OIPs): there are external and internal interested parties including MTIT staff. In March 2021, a Steering Committee was selected for TechStart project from different ministries and associations (as a key category of OIP's). The Steering Committee mandate is to advise and make recommendations for the public and private sector to improve the economic opportunities for individuals and firms in the IT sector in the West Bank and Gaza, with emphasis on TechStart project areas of interventions.

Disadvantaged / vulnerable individuals or groups: Through the updated SEP, and for the parent project and AF, the PIA aims to ensure that the engagement process is inclusive, individuals and groups who may find it more difficult to benefit from the opportunities offered by the Project and those who may be 'directly and differentially or disproportionately affected by it because of their vulnerable status' are identified and considered. The parent Project and AF will ensure specific steps are taken to reach these groups (women and unemployed young engineers and IT graduates) and offer them the opportunity to engage in discussion about the Project and its activities.

And for software activities, consultations with all stakeholders according to the SEP should be conducted. PIA will provide during consultation sufficient information on the GRM process and means by which grievances can be raised and will be addressed.

48. To facilitate meaningful consultations, PIA should provide all the relevant material and information in a timely manner, and in a form and language that are understandable. The location of the relevant documents are advertised through commonly used media (such as project website: Techstart.ps and project's social media platforms). Depending on the public interest in the potential impacts of the sub projects, a consultation session may be required to better convey concerns.

49. Once the sub-project has been selected based on criteria for developing grant proposals and the screening process has been completed, the PIA will conduct consultations with the beneficiaries and stakeholders about the results and identify key issues and determine how the concerns of affected or interested individual or group will be addressed in the ESMP for construction/installation of sub-projects. The appeals process will be according to the national regulations and the WB's provisions respectively.

50. A Stakeholder Engagement Framework proportionate to the nature and scale of the parent project and its potential risks and impacts was developed and disclosed by the MTIT before project appraisal (March 24, 2020), provided with the views of stakeholders on the SEP, identification of stakeholders and the proposals for future engagement. The SEF was later updated to a SEP and is currently updated to reflect the AF and was disclosed on December 14, 2022. In line with ESS10, a grievance mechanism (GM) has been implemented for the parent project to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. The GM from the parent project will be used in the AF.

51. The PIA and MTIT disclosed on their websites (Techstart.ps) and (http://www.mtit.pna.ps) respectively, project information and all key documentation (for the parent project), in addition to the updated SEP for the AF (disclosed on December 14, 2022), to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The information will be disclosed in local language, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, women, mobility, differences in language or accessibility).

52. The disclosure should include information on: (i) stakeholder engagement process, highlighting the ways in which stakeholders can participate; (ii) time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported and; (iii) the process and means by which grievances can be raised and will be addressed. A friendly use one pager that includes GM information is prepared and disclosed on the website for the parent project and will be used for the AF.

53. The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. Focus group meetings dedicated specifically to vulnerable groups identified for the sake of the project may also be envisaged as appropriate. As the PIA will also ensure coordination of the

project's communications strategy, covering all project components and stakeholders, PIA will ensure that the views of vulnerable groups will be included in the project's communications strategy.

5.2 Summary of Stakeholder Engagement Activities Conducted Under the Parent Project

54. Several stakeholder engagement activities were conducted under the parent project. Stakeholder consultation meetings took place as part of the preparation of the project and included preliminary meetings with different stakeholders during the screening/scoping for, individual meetings and round table meetings with different entities during the preparation phase. The main consultations took place both in West Bank and Gaza during September 23-25, 2019 and November 26-28, 2019, and included discussions of project components and activities, targeted groups, scoping of potential and environmental risks, institutional and implementation arrangements.

As of the project effectiveness in October 2020, the PIA conducted 5 stakeholder engagement activities. The PIA conducted six main stakeholder engagement activities under the Parent project. In March 2021, the PIA conducted a consultation meeting with project stakeholders to introduce the TechStart project, its objectives, components, risks and mitigation measures and the project's E&S instruments. This engagement activity has given the chance for project beneficiaries and partners to interact and provide their feedback and concerns. In July 2021, the PIA held a launching event for the "Gaza Tech and Innovative Recovery Program", which aimed to provide urgent financial support to Palestinian tech and tech-enabled companies that have been damaged partially or fully by the 2021 war on Gaza to enable them to recover from the great losses to their business operations and infrastructure. In August 2021, the PIA also organized an information session to launch the COVID-19 Support Program", which aimed to provide financial support to Palestinian companies struggling through the current COVID-19 pandemic. During 2022, two consultation meetings were conducted (March 2022 and August 2022) under the Human Capital Improvement Stipends Program (HCIS program) aiming to introduce the new program and its stipend windows; which will help the IT firms and startups increase their opportunities to attract new international clients by employing several measures to retain, enhance, and train their employees.

Participants in the consultation meetings included entrepreneurs, SMEs, youth and female led businesses, IT university students, IT university graduates, newly hired youth, Ministry of Telecom and Information Technology (MTIT) and TechStart team. The consultation meetings included informing participants about the project components and activities, targeted groups, potential social and environmental risks and mitigation measures, institutional and implementation arrangements. At the end of each meeting, a Q&A session discussions conducted with different types of stakeholders was organized. Participants asked questions about the selection criteria, hiring procedures, beneficiary individuals and firms, stipends, trainings and internships, IT-related studies.

5.3 Summary of Stakeholder Engagement Activities Conducted for the Additional Financing

55. In accordance with the ESS10 requirements, the PIA conducted a virtual consultation meeting on October 26 2022, for both the announcement of the Additional Financing a well as for the launch of Improving the IT Service Ecosystem Program "Pioneer".

The consultation meeting started by introducing the TechStart project, its objectives, components, and its implementation procedures. The session highlighted on the additional financing obtained from the Dutch and the SWISS governments and the EU, implemented by DAI. The meeting's objective was also to present Pioneer Program, targeted groups, potential social and environmental risks and mitigation measures including the GRM system. At the end of the meeting, a Q&A session was conducted, and feedback was obtained from the participants.

The TechStart Environmental and Social Officer explained the Environmental and social Management Framework (ESMF) highlighting on the identified social and environmental risks under TechStart project. The ESO suggested measures and plans to reduce, mitigate, and/or offset potential risks. Social and environmental risks have been identified including: discrimination and social exclusion, specifically relating to vulnerable groups; labor and workers' rights; sexual exploitation and abuse / sexual harassment (SEA/SH); and minor environmental impacts such as occupational health and safety risks, and e-waste production. Beneficiary firms will be requested to comply with the LMP provisions prepared for the project including signing Code of Conduct and establishing a GM for their workers. Continuous consultations as detailed in the SEP will be conducted to inform stakeholders about the project progress. During the project's implementation period, it is expected to receive complaints from the project's affected parties. To this end, a system for filing and handling project's complaints is established. The ESO also explained that the GM system includes special channels to receive the Sexual Harassment and GBV complaints, which will be taken into consideration with the highest level of confidentiality.

Participants in the consultation meetings represented over 95 IT firms working in West Bank and Gaza: Entrepreneurs, SMEs, youth and female led businesses such as Finbloom for Financial Solutions Management, Provision and Creativity for digital marketing, Ministry of Telecom and Information Technology (MTIT), Palestinian IT organizations (PITA, PICTI), TechStart team and the World Bank group). Participants raised questions regarding selection criteria and project activities such as the target threshold for the New IT Training Service Providers. Participants requested clarifications on salaries and fees associated with delivery/on-going execution of core business functions covered by the grants.

During the parent project implementation, the PIA also continued and ensured frequent and timely disclosure of project information for all events and information sessions via social media platforms (Facebook, Instagram and LinkedIn), the project website (www.techstart.ps), the MTIT website and its social media platforms, and local newspapers. Information regarding the project GM has similarly been disseminated and continues to be shared in ongoing consultations.

56. Grievance Mechanism:

A grievance mechanism (GM) for the Parent project is in place for this project to ensure that PAPs have the access to a viable system to air grievances and to seek resolution with no intimidation or coerciveness. It includes an appeals process for complainants who are not satisfied with the resolution outcome, and provides accessible and multiple grievance uptake channels—online and offline, telephone (using +970-2-298 8530), email (using Techstart_Complaints@dai.com), in person and electronically through an electronic grievance submission form link provided on the Techstart website (www.techstart.ps). A record of grievances receives is also maintained by the PIA. Thus far, the parent project has recorded three project specific grievances that were related to selection of beneficiaries. In line with the GM manual, all complaints were documented, processed, resolved and closed within the time frame stipulated in the GM manual. The PIA provided written responses and clarification about the selection criteria used by the technical committee, and reasons for not accepting the grant proposals. Two complainants who were not satisfied by the responses provided by PIA also contacted the Bank's task team to get further clarification about the beneficiary selection process (detailed in the project operation manual which is disclosed on the project website). The GM also accepts anonymous grievances.

A detailed GRM manual that includes guidelines on filing and handling complaints at the project's level is finalized with the support of the World Bank consultant including GBV complaints (GBV/SH complaint mechanism is also detailed in the same manual). PIA should inform PAPs and other potential complainants of the GRM, its functions, procedures, timelines and contact persons' information both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities.

The GM manual prepared for the parent project will be used for the AF. Finally, the GM will remain functional throughout the project lifecycle and will be periodically analyzed and strengthened as required.

57. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complaint directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service).

A complaint can be submitted to the Bank GRS through the following channels:
•   By email: grievances@worldbank.org
•   By fax: +1.202.614.7313
•   By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA.

58. Workers' Grievance Mechanism

Beneficiary companies are requested (under the parent project and AF) to establish a GM for their workers prior to the project launching. The guidelines for workers' GM are detailed in the project LMP. The ESO is responsible for monitoring grievances managed at the companies' level and regularly evaluates the effectiveness of the GM.

CHAPTER SIX: ENVIRONMENTAL AND SOCIAL IMPACTS

6.1 Purpose of the Environmental and Social Management Plan (ESMP)

59. For sub-projects for which an ESMP is deemed necessary following the screening, the level of detail required in ESMPs will also be based on the level of sub-project E&S risks. In some cases and in agreement with the Bank, a simplified or abbreviated ESMP will be prepared focusing primarily on the risk mitigation plan.

60. The purpose of the Environmental and Social Management Plan (ESMP) is to provide guidance during the implementation of subprojects related to stimulation of private investments in the IT service ecosystem in component 2.1 and IT infrastructures subproject in component 2.3 Towards this end, the ESMP will:

   - Determine the potential impacts of sub-projects and set out the proper mitigation measures to mitigate the risks and impacts;
   - Set out the basis for compliance and enforcement of terms and conditions for approval;
   - Monitor compliance.

61. Thus, the subproject ESMP (annex 4) (i) describes the potential adverse environmental and social risks and impacts of future subprojects; (ii) outlines proposed mitigation measures to be adopted and indicate parties responsible for implementing mitigation measures; (iii) identifies parties that will carry out the monitoring of the implementation of the mitigation measures; (iv) outlines the time horizons for the various activities; and (v)detail the associated costs and sources of funds. The ESMP will be included in the Project Implementation Manual and the cost estimates for implementing the ESMP will be included in project cost tables.

6.2 Environmental and Social Impacts

62. As regards the proposed TechStart, it would include sub-projects, potential adverse environmental and social impacts on the natural and human environment are likely to be associated with the future sub-projects. The sources of impacts will arise from subproject processes at the selection and operation phases, and end-of-life.

63. After concept stage of the TechStart project, the project component for funding rooftop solar panels, AC, and similar equipment was dropped from the project. The project current scope support under component 2.1 Seed grants to stimulate private investments in the IT service ecosystem, with expected increased number of IT equipment, and therefore increase of e-waste. The project will also allocate grants for IT infrastructures in component 2.3. The risks associated with these activities are generally short-term, temporary and reversible which can be reduced or eliminated by known mitigation measures. Based on this, the environmental risk classification is "moderate".

64. Despite the small scale and localized nature of the sub-projects, the environmental risks and impacts discussed above are of moderate significance. There will be also some environmental benefits through improving the office ergonomics.

65. he social risks associated with the project are considered moderate. The social risks are limited in nature and scale, and can be summarized as follows: (1) risks related to social exclusion in its various forms that would need to be mitigated through ensuring that project benefits, such as access to grants, and job opportunities, can be accessed and optimized for the most vulnerable and youth, including those from poor communities and women, (2) risk of exposure of youth, including vulnerable youth and women to sexual exploitation, or poor working conditions, (3) risks related to labor and working conditions for project workers who are hired for the project, depending on the resource arrangements (i.e. civil servants and consultants), workers engaged with benefitting firms/companies (who get jobs at tech-enabled companies as a result of investment grants that pay their salaries provided by the project). LMP has been updated for the AF to address the labor related issues.

66. An assessment of Gender Based Violence (GBV) was done and the risk is rated low. The project level GRM will include specific procedures for GBV including confidential reporting and ethical documentation of GBV cases. The project will not result in any risks related to involuntary resettlement. Private sector firms seeking grants to establish new enterprises or subsidiaries will need to demonstrate adherence to willing-buyer willing-seller criteria to qualify.

67. <u>A Labor Management Procedure (LMP) has been prepared to minimize the risks associated with labor.</u> <u>The project activities will entail employment of workers during implementation.</u> It is assessed that the key labor risks are:

- Discrimination in Human Resources Policies and Procedures;
- Discrimination in Working Hours and Leave;
- Discrimination in Wages and Benefits; Child Labor;
- Forced labor;
- Working under pressure and poor working conditions that may take place at the supported companies' offices, where the PIA will sign grant agreements with the companies to fund salaries for the new employees and trainees.

68. However, these impacts have been assessed to be short-term impacts that can be minimized, if appropriate mitigation measures are applied, as required by and based on the recommendations in this report.

Identification of potential adverse impacts of projects and mitigation measures

69. Identification of potential adverse environmental and social impacts of sub-projects is an activity that will take place at project identification/planning stage. The processes will be carried out by ESO at PIA.

70. Proposed mitigation measures will be identified in line with the subproject Environmental and Social Screening results.

6.3 Mitigation Measures

71. An environmental and social officer (ESO) was recruited in December 2020 to be included in Project Implementation Unit (PIA). The ESO is responsible to oversee the compliance of the environmental and social requirements during project implementation.

72. Mitigation measures involve elimination of impact, or at least minimizing the impact to the lowest level possible. Mitigation measures are related to issues of waste management, labor and working conditions (as detailed in project LMP), institutional support including training, and recruitment of qualified personnel.

73. The mitigation measures for e-waste include; preparation of e-waste management plan to ensure transporting the e-waste using registered transport services, and e-waste are disposed off at designated disposal site approved by EQA. Contents of e-waste management plan is shown in Annex 5.

74. PIA will mitigate the environmental and social impacts associated with the project activities by including environmental and social clauses/ESMP in all contracts / grant agreements to enforce compliance with these clauses/E&S requirements / ESMPs if deemed necessary and ensuring that benefiting firms' staff are familiar with these clauses/E&S requirements / ESMPs. Ensure that suppliers and benefiting companies implement subproject LMP. Ensure fair competition by ensuring equal opportunity, fair competition by creating a level playing field, ensure access to information and transparency in decisions, undertake public consultation and information dissemination, and establish and create awareness on grievance mechanism as indicated in the SEP.

Environmental mitigation measures will include:

- Waste management;
- Adherence to Environmental Guidelines for benefiting firm/individual (Annex 2) and recommendations made in the screening forms;

Social measures will include:

- Skills training for ESO in environmental and social screening;
- Ensure fair competition by ensuring equal opportunity
- Ensure access to information and transparency in decisions
- Undertake public consultation and information dissemination
- Establish and create awareness on grievance mechanism

6.4 Monitoring Plan

75. Monitoring of the implementation of the E&S requirements / ESMP when deemed necessary will be done by ESO at PIA.

76. The following are specific institutional responsibility for the subprojects to be carried out by PIA and ESO:
    - To produce an annual and periodical reports to the World Bank indicating the actions that have been undertaken towards the implementation of subprojects on the environmental and social status.
    - Develop the key indicators for monitoring purposes with the World Bank and ensure the monitoring capabilities and reporting to the Bank.
    - Carrying out stakeholder engagement and consultation and collaborates with stakeholders where these sub-projects will be implemented.

CHAPTER SEVEN: INSTITUTIONAL SETUP FOR ENVIRONMENTAL AND SOCIAL MONITORING AND CAPACITY BUILDING REQUIREMENTS

7.1 Responsibilities for Environmental and Social Monitoring

77. Environmental and social monitoring will be carried out by the PIA. Monitoring of environmental and social safeguards needs to be carried out during the during the implementation and operation of the project.

78. Table 2 provides some of the generic environmental and social monitoring indicators, to be adapted to the projects as necessary. These indicators need to be expanded in keeping with the types of activies being funded. The indicators should be included in the PIA project's monitoring and evaluation (M&E) system.

Table 3: Key Environmental and Social Monitoring Indicators

ISSUE	REMARKS
Number of environmental mitigation measures implemented and financed by projects	
Implementation status of the Environmental Guidelines for benefiting firms	
Number of complaints on inconveniences caused by the project	
Number of consultations conducted	

7.2 Monitoring, evaluation and reporting

79. Monitoring, evaluation and reporting on environmental issues will be part of project implementation processes and reporting systems. ESO at PIA will keep records of all environmental and social activities of sub-project. The ESO will carry out environmental and social screening process using the Environmental and Social Screening Forms (Annex 1). Compliance to environmental and social screening requirements will also be generated based on quarterly reports, annual reports, evaluation reports, feedback meetings and Implementation support missions. PIA will regularly report to the Bank on the status of environmental and social management of projects in the project's Quarterly Reports.

7.3 Capacity Building and Environmental and Social Trainings

80. The PIA recruited a qualified ESO and provided him/her with necessary capacity building to ensure that the ESMF is effectively implemented. The ESO participated in the local ESF training and capacity building that was held by WB from May 15 to May 19, 2022 (15 hours) about ESF fundamentals. Moreover, the ESO also participated in the ESF training about ESS2 that was held on June 7th and 8th 2022 (3 hours). However, capacity building is an ongoing activity, therefore, other trainings may be needed for the PIA in different aspects and standards that apply to the project

81. Capacity building will help improve the effectiveness of stakeholders' engagement in management of environmental and social impacts during planning, implementation and operation of proposed sub-projects.

82. Capacity building will enhance the ESMF management capacity by allowing real application of the critical practices such as the following:

    - Basic practices:
    - Screening of subprojects for potential environmental and social impacts, assigning mitigation measures, public consultation; steps 1-7 to implement the environmental and social screening process for projects;
    - Management of impacts during implementation; monitoring of effectiveness of measures;
    - Monitoring and grievance redress.

7.4 Capacity of PIA to manage E&S requirements in the parent project

As mentioned earlier, the ESO participated in trainings related to the management of environmental and social issues. However, capacity building is an ongoing activity, therefore, other trainings may be needed for the PIA under the AF in different aspects and standards that apply to the project.

83. The following E&S requirements were implemented at the parent project and will apply to the AF:

    - PIA developed an E- waste management plan (approved by the Bank in August 2021and provided in(Annex 5) to be implemented and adopted by project beneficiaries throughout project implementation.
    - In accordance with the revised and simplified approach, PIA conducted 44 environmental and social screening of subprojects/grants that were approved by the Bank.
    - All screened subprojects identified medium to low E&S risks, with a particular focus on labor and working conditions and disposal of e-waste, and no further E&S assessment was required following the initial screening, as the following:
    - Relevant E&S management requirements were incorporated in 44 grant agreements.

84. Monitoring and Reporting implemented under the parent project which will also apply to the AF:

- PIA assessed and monitored 44 firms, before grant signing and during grant implementation.
- The mitigation measures were implemented by the firms/ contractors with monitoring done by the ESO at PIA. Monitoring, evaluation and reporting on environmental issues was part of companies' processes and reporting systems during the subproject life cycle.
- PIA maintained the records of the compliance with the E&S requirements; data base and progress reports.

PIA ensured that all beneficiaries and contractors complied with the results and recommendations of the screening reports, which required the application of simple mitigation measures.

ANNEXES

Annex 1: Environmental and Social Screening Form

Name and Type of Activity:	
Beneficiary Firm.	
Objective of the screening process	The main objective of the screening process is to: (i) identify potential key environmental and social impacts and risks; (ii) determine appropriate environmental and social risk classification, according to ESS1; and (iii) identify mitigation and monitoring measures for activities with adverse impacts; and incorporate mitigation measures into the subprojects as appropriate..
E&S framework **Risk classification**	• Project activities under Techstart project shall be implemented in an environmentally and socially sustainable manner, in accordance with the national regulations, the Bank's Environmental and Social Framework (ESF) and WBG EHS Guidelines. The site-specific Environmental and Social Assessment (ESA) shall be in accordance to the E&S instrument prepared for the project including the Environmental and Social Management Framework (ESMF), the Stakeholder Engagement Plan (SEP) and the Labor Management Procedures (LMP). • TechStart Project Classification The environmental and social risks associated under Techstart Project are considered moderate. This project is classified as of moderate risk since the impacts of the project activities are considered medium in significance and short term in nature.
Contact person and contact details	
Expected start date (month/year) and duration (in months) of project implementation phase	
Financed activities by PIA	
Environmental and social risks and impacts associated with the financed activities	Environmental Risks Social Risks
Expected number of workers to be financed by subprojet	

Section (A): Subproject Eligibility Screening Checklist

	Type of Projects	Yes/No	Recommendation
1	Do the eligible activities to be financed or co-financed have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works, to be classified of substantial or high risks?	No	
2	Do the eligible activities to be financed or co-financed have potential adverse environmental impacts on human populations or environmentally important areas— including wetlands, forests, grasslands, and other natural habitats. These impacts are site-specific; few if any of them are irreversible, to be classified of substantial or high risks?	No	
3	Do the eligible activities to be financed or co-financed have any industrial related or construction activities, or any other activities that entail pollution generation.	No	
4	Do the eligible activities to be financed or co-financed include installation of rooftop solar panels, AC, generators, and similar equipment?	No	

Recommendations:
- If one of answer is **Yes**, the Sub-project is not eligible and rejected. Based on the above, the sub-project is eligible.
- If all the answers are **No**, Sub-project is eligible identify potential environmental and social risks and the relevant ES mitigation measures/instruments are as shown in Section B below:

Section (B) Screening Checklist

Part 1	Assessment of start-up's / SME's				
Labour working conditions		**Yes**	**No**	**Status**	**Proposed Mitigation Measures in accordance with project LMP / comments**
1.1	Registration and compliance Is FIRM registered at the Palestinian Ministry of National Economy?				
1.2	Is the premises where the project will be accomplished is privately owned or rented?	Owne d	Ren ted		
1.3	Does the firm employ its workers according to the national labour law?				
1.4	Does FIRM COMPANY has an effective/ responsive Workers' Grievance Mechanism (GM) ?				
1.5	Does FIRM COMPANY apply a CoC for their workers?				
Exposure to COVID-19					
1.6	Does FIRM apply national measures to minimize the risk of COVID-19?				
1.7	Does the financed activities entail face to face gatherings of any sort managed by FIRM ?				
1.8	Does the financed activities entail face to face gatherings of any sort managed by the PIA?				

Part 2	Assessment of Activities			
Discrimination and social inclusion		Yes	No	Proposed Mitigation Measures in accordance with the project SEP / comments
2.1	Is there a likelihood that the activity would have inequitable or discriminatory adverse impacts on affected populations? or excluded individuals or groups?			
2.2	Will the project benefit different groups or individuals who are vulnerable or disadvantaged?			
2.3	Is the project likely to provide local employment opportunities for vulnerable beneficiaries, including women and youth?			
2.4	Does the activity include measures to facilitate access of vulnerable or disadvantaged persons to the benefits of the project?			
2.5	Has the role of women been considered in project design and implementation?			
2.6	Is there responsive grievance process available to workers in relation to GBV?			
Stakeholders Engagement				
2.7	Is the project/subproject being designed with sufficient local stakeholders' engagement and consultation in the planning and design process?			
2.8	Is there a likelihood that the project would exclude any potentially affected stakeholders from fully participating in decisions that may affect them?			
Covid-19 exposure				
2.9	Will the proposed project increase risk of exposure to COVID-19?			
2.10	Does the project include measures to mitigate risks arising in connection with addressing COVID-19?			
Sexual exploitation and abuse/sexual harassment (SEA/SH)				
2.11	Will the project increase the risk of SEA/SH?			
2.12	Is there responsive grievance process available to workers in relation to SEA/SH?			

Part 3	Environmental risks - Pollution	Yes	No	Proposed Mitigation Measures / comments	
3.1	Will the Project potentially result in the generation of e -waste?				
3.2	Will the Project potentially result indirect generation of e -waste?				
3.2	Does the FIRM COMPANY have safe disposal procedures for PPE's including masks?				

Conclusion

Risks rating and requested mitigation measures:

Responsible person and the name of the person completing this form:
Name:
PIA
Phone
E-mail:

Annex 2: Environmental and Social Guidelines for Benefiting Firm/Individual Beneficiary

General Environmental and Social Management Conditions

1. In addition to these general conditions, the benefiting entity firm/individual shall comply with any specific Environmental and Social Management Plan (ESMP) for the works he is responsible for and plan to fully take into account relevant provisions of that ESMP. If the Contractor fails to implement the approved EMP after written instruction by PIA to fulfill his obligation within the requested time, PIA reserves the right to stop funding the subproject.

2. Child Labor: Benefiting entity firm/individual must not employ workers below the age of 18.

3. The benefiting entity shall adhere to the proposed schedule for monitoring to ensure effective feedback of monitoring information to project management so that Impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

4. Areas for depositing end-of-life e-waste shall be approved by the PIA and EQA before the commencement of work.

5. Benefiting entity should inform PIA of any incident or accident caused by or affecting subproject implementation which has had or is likely to have a significant adverse impact on the workers or the natural environment.

Benefiting entity shall adopt, and all workers shall sign and comply with the project-specific Code of Conduct.

Grievance Mechanism for Workers

Benefiting entity will put in place a Grievance Mechanism for their workers that is proportionate to their workforce and shall communicate and inform all workers about the available tools to lodge grievances such as telephone numbers and email. The GM shall include special referral pathways for workers' grievances on GBV and SEA/SH with referral to the PIA's GRM. The guidelines for workers' GM are detailed in the project LMP.

The GM shall be developed according 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.
- 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 PIA and MTIT or national courts if s/he 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 or friend.

- 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.

Cost of Compliance

It is expected that these conditions are part of standard good workmanship and state of art as generally required the Contract with the benefiting entity. No payments will be made to the benefiting entity for compliance with any request to avoid and/or mitigate an avoidable impact.

Annex 3: Code of Conduct and Business Ethics

(The firm shall adopt, and workers shall sign and comply with the project-specific Code of Conduct)

<div dir="rtl">

مدونة قواعد السلوك واخلاقيات العمل
مقدمة

يأتي الاهتمام بمواثيق سلوك وأخلاقيات العمل والتشغيل كأحد مداخل تطوير الاداء للعاملين واصحاب العمل. إن إعداد مدونة قواعد السلوك وأخلاقيات العمل من شأنه تعزيز قيم والممارسات الايجابية في العمل، وتعد مدونة السلوك إطاراً عاماً يجب على العاملين في المشروع التقيد به والعمل بمقتضاه، فهي مدونة تلقي الضوء على المعايير و الاخلاق والقيم التي يجب أن يتحلى بها العامل أثناء أداء أداء واجباته، ومن ثم فهي قواعد ستسهم على نحو فاعل في الارتقاء بمستوى جودة الاداء والارتقاء به. إن هذه المدونة تشكل جزءاً من مقتضيات العمل في المشروع بالتركيز على اجراءات الوقاية والسلامة والصحة العامة المتعلقة بكوفيد 19، ويجب تطبيقها في كل اوقات العمل وطوال فترة التشغيل، وسوف يتم تزويد كل عامل بنسخة منها، ليقرأها ويعمل بموجبها.

أولا: المبادىء الاساسية لمدونة السلوك واخلاقيات العمل

إن جودة الاداء ونجاح العمل تتوقف على الالتزام بقواعد السوك العامة واخلاقيات العمل، والتصرف بطريقة عادلة وصادقة كأفراد مسئولين اجتماعيا انطلاقا من ايماننا الراسخ بمسؤوليتنا الاجتماعية التي لها أثرا إيجابيا كبيراعلى المشاريـع التي نعمل بها. ولتحقيق هذا، **يجب علينا احترام هذه المبادئ الاساسية:**

النزاهة والامانة : الإيمان بتعزيز التصرف بأمانة في جميع العلاقات مع التقيد الصارم بجميع القوانين المعمول بها ، احترام كرامة كل شخص والحفاظ على سلامتهم .

الشفافية: الاحترام المتبادل والحوار والشفافية هي أساس العلاقة مع اصحاب العمل والسلطات ذات العلاقة ، والتي تتوافق مع مبادئ التعاون والصدق والانفتاح.

الموضوعية والإستقلالية : العمل بموضوعية واستقلالية وتجنب أي نوع من أنواع الفساد أو تضارب المصالح الذي قد يؤثر على اتخاذ القرارات المتعلقة بالعمل.

المسؤولية: توفير بيئة عمل آمنة وصحية للعمال ، واحترام الحقوق والتقيد بالواجبات من مقتضى المسؤولية ، واحترام المجتمعات التي نعمل فيها.

ثانيا: قواعد السلوك واخلاقيات العم

القسم الاول : الحقوق العامة

- يلتزم العامل بتأدية عمله بإخلاص وأمانة وبالمحافظة على أسرار العمل وأدواته، ويعتبر مسؤولاً عن الادوات التي في عهدته وعليه الحفاظ عليها، وفي حالة وجود ظرف خارج عن ارادته او قوة قاهرة، فان العامل لا يعتبر مسؤولاً عن خلل الأدوات أو ضياعها.

- على العامل أن يلتزم بأخلاقيات العمل والحفاظ على خصوصية السكان والعمال في منطقة العمل، دون الإشتباك معهم أو التسبب بأي أذى لهم بأي شكل كان. ويجب الإمتناع عن المشاركة في أي عنف بدني او لفظي لأي من العاملين أو السكان.

- على العامل التقيد بساعات العمل المطلوبة، وكذلك التقيد والإمتثال بالمهام المكلف بها.

- على العامل الإلتزام بإجراءات السلامة المتبعة في الموقع، خاصة عند إستخدام الألات الخطرة، وأي إجراءات إضافية يتم طلبها

- يجب على العامل الإبلاغ فورا عن أي أمراض مزمنة يعاني منها أو عند الشعور بالإعياء ، وعن أي عقاقير يتلقاها العامل.

- الإمتناع عن التسبب بأي نوع من المضايقات سواء اللفظية المباشرة او غير المباشرة لأي شخص أثناء فترة العمل، وخاصة من فئة النساء والأطفال وذوي الإحتياجات الخاصة.

- من حق العامل أن يوقع عقد عمل مع صاحب العمل على أن يكون باللغة العربية، وذلك لحفظ حقوق العامل ، علماً بأن عقد العمل يجب أن يتضمن : الأجر، نوع العمل، مكانه ومدته، ساعات وأوقات العمل، كما ويجب ان يتضمن العقد الاجراءات الصحية وشروط الوقاية المتعلقة كوفيد 19، والتي اقرتها وزارة الصحة الفلسطينية، ويجب أن يوقع العقد من قبل صاحب العمل والعامل بحيث يحتفظ العامل بنسخة أصلية من العقد.

- علي صاحب العمل أن يلتزم بالتامين على جميع عماله عن إصابات العمل لدي الجهات المرخصة في فلسطين.

- يجب أن تتخلل ساعات العمل اليومي فترة أو أكثر لراحة العامل لا تزيد في مجموعها عن ساعة مع مراعاة ألا يعمل العامل أكثر من خمس ساعات متصلة دون تخصيص وقت للراحة.

- التقيد باوقات العمل وتكريس اوقات العمل للقيام بالمهام والواجبات المتعلقة بطبيعة العقد ، كما نص عليها عقد العمل.

- ضمان حق العامل في التظلم او الشكوى من اي انتهاك لحقه او من اتخاذ قرار خاطيء بحقه.

</div>

القسم الثاني: حماية حقوق النساء

- معاملة النساء باحترام بغض النظر عن العرق أو اللون أو اللغة أو الدين أو الرأي السياسي أو غير السياسي أو الأصل او الإعاقة اوأي وضع آخر.

- عندما يكون لدى المراة العاملة مخاوف أو شكوك فيما يتعلق بأعمال العنف القائم على النوع الاجتماعي من قبل اصحاب العمل او اي طرف ذو علاقة بالعمل ، يجب عليها الإبلاغ عن هذه المخاوف وفقًا لإجراءات الشكاوي المعتمدة في المشروع. على ان يتم التعامل مع هذه الشكاوي بخصوصية كبيرة للحفاظ على كرامة المشتكية

- يجب توفير الحماية للنساء وتهيئة أماكن امنة في العمل للنساء وخاصة الحوامل والتاكد من عدم نقل أي امرأة حامل بشكل غير صحيح ، والعمل على ازالة او منع تعرض النساء الحوامل للمخاطر.

- يجب توفير أماكن للنظافة الشخصية لإستخدامها من قبل النساء العاملات بعد الإنتهاء من العمل. وايضا توفير مرافق صحية (دورات مياه) خاصة بالنساء في اماكن العمل، ويجب أن يتم تعقيم هذه الأماكن بشكل يومي.

- يجب تنفيذ لقاءات توجيهية قبل بدء العمل في الموقع للتأكد من أن الجميع على دراية بقواعد السلوك الخاصة بالعنف القائم على النوع الاجتماعي.

القسم الثالث : حماية حقوق ذوي الاعاقات

- يلتزم اصحاب العمل بتهيئة البيئة الملائمة لاحتياجات ذوي الإحتياجات الخاصة وتوفير تسهيلات الحركة والتنقل في اماكن العمل.

- عدم التمييز بحق المعاقين والمعاقات في العمل، واحترام حقهم / هن في اختيار نوعية الاعمال التي تناسب قدراتهم /تهن ، واهتماماتهم/هن واحتياجاتهم/هن.

- الالتزام بتوفير خدمات ومرافق صحية مواءمة لاستخدامات ذوي الاعاقة الحركية في مواقع العمل.

القسم الرابع : الصحة والسلامة المهنية

- على العامل التقيد بتطبيق شروط واجراءات الصحة والسلامة العامة الصادرة عن وزارة الصحة الفلسطينية ، والالتزام بقواعد السلامة والصحة المهنية في العمل.

- على صاحب العمل تقديم الإسعافات الأولية اللازمة للعامل في حال الاصابة ونقله إلى اقرب مركز للعلاج .

- الإلتزام باجراءات ومتطلبات السلامة والصحة العامة المتعلقة بكوفيد 19 بما فيها التباعد الجسدي واللبس الواقي وكل ما ينص عليه البروتوكول الصحي.

القسم الخامس : خصوصية البيانات الشخصية والحماية من الانتهاكات الأخلاقية

• يلتزم صاحب العمل (خاصة العاملين في مجال تكنولوجيا المعلومات التي تستخدم الإنترنت ومنصات البيانات الرقمية) باتخاذ كافة الإجراءات اللازمة لحماية خصوصية البيانات الشخصية للعملاء، وضمان حقوقهم في تقديم شكوى بشأن التعرض لأي انتهاك اوالعنف القائم على النوع الاجتماعي (التحرش الجنسي والاستغلال والاعتداء الجنسي). يجب على صاحب العمل توفير آلية للتظلم عن هذه المخاوف وفقا لإجراءات الشكاوي المعتمدة عند صاحب العمل. .

Annex 4: Environmental and Social Management Plan (ESMP)

Issue	Likely Impact	Mitigation measures	Responsibility	Monitoring	Time Horizon	Cost Estimates (US$)
Economic impact and livelihoods	Help stabilize electricity supply to benefiting companies, thus revitalizing businesses	• Ensure wide dissemination of information to all stakeholders	PIA	PIA	Throughout the project implementation	-
Social exclusion or inequity	Could arise from fairness and equity in decision-making	• Ensure fair competition by ensuring equal opportunity • Apply SEP including: • Ensure access to information and transparency in decisions • Undertake public consultation and information dissemination • Establish and create awareness on grievance redress mechanism	PIA	PIA	Throughout the project implementation	-
Labor conditions	• Discrimination in Human Resources Policies and Procedures; • Discrimination in Working Hours and Leave; • Discrimination in Wages and Benefits; • Non-Discrimination and Equal Opportunities; • Grievances; • Child Labor; • Forced labor. • ---GBV/SH/SEA	• Develop and implement grievance mechanism for workers • GBV, Child protection training/awareness campaign for contractor, sub-contractors and communities; • Provisions for handling of GBV in the GRM; • Development and implementation of a stakeholder engagement plan (SEP) • Development and Implementation of a Project	PIA/Contractor	PIA	Throughout the project implementation	Incl. in Contract

Issue	Likely Impact	Mitigation measures	Responsibility	Monitoring	Time Horizon	Cost Estimates (US$)
		Grievance Mechanism • (GM) • Implement CoC • Bidding documents to reflect the findings of the ESIA, and the requirements of the ESMP, to cater for GBV and overall ESHS risks				
e-waste disposal	Chemical contamination of soil and ground water from poor disposal of e-waste.	• Prepare e-waste management plan. • Dispose e-wastes at approved waste management sites using registered transport services and disposal site. • Do not treat e-waste as domestic waste • Contract with recycling facility capable of handling e-wastes.	• PIA	• MTIT	• Before project effective ness	-
Training & Capacity Building for ESO	As indicated in section 7.4, the training program to be done by consultant will include an orientation program on ESF, ESMF, LMP, SEP, environmental assessment processes, monitoring and evaluation (M&E), OHS, waste management, and participatory methodologies.					**(US$ 10,000)**

Annex 5: E-Waste Management Plan

Contents

1.   Introduction

The E- Waste Management Plan shall serve as a guidance document for Techstart Beneficiaries and their employees to meet the challenges for providing a safe, environmentally sound, and unified response for E-waste management. The goal of the E-Waste Management Plan (EWMP) is to protect human health and the environment while complying with applicable local regulatory requirements.

This plan involves the tracking of E-waste from the point of generation through its final disposition. Beneficiaries supported by TechStart project shall avoid the generation of e-waste. Where waste generation cannot be avoided, the beneficiary shall minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. Where waste cannot be reused, recycled or recovered, the beneficiary shall treat, destroy, or dispose of it in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. All Beneficiaries' personnel involved in any waste management process must read and have a thorough knowledge of the procedures contained within this guidance document.

The Techstart beneficiaries shall use this template as a guide and adapts its content to their individual procedures. Each individual's participation is critically important in making the E-Waste Management

Plan reliable, safe, and efficient.

2.   Generation of E-Waste and associated impacts

E-Waste, also called electronic waste, is the name for electronic products that have come towards the end of their "useful life." This includes computers, monitors, copiers, printers, cellphones, and many more electronic devices (more elaborated items are provided in Annex B). The project will renovate and install the ICT equipment at (insert the place) to enhance (insert the purpose), the ICT equipment is the direct source of E-Waste. E-waste has a negative effect on the environment in the following ways:

Improper including: (i) improper disposal of electronic waste leads to public health and safety risks occurring from discharge of heavy metals in the environment; and (ii) polluting air, water and soil due to the release of pollutants such as persistent organic pollutants (POPs), including flame retardants (poly brominated biphenyl), dioxins (polychlorinated dibenzodioxins and dibenzofurans), perfluroalkyles, polycyclic aromatic hydrocarbons (PAHs), and heavy metals (lead, chromium or hexavalent chromium, cadmium, mercury, zinc, nickel, lithium, beryllium) during dismantling, burning, and chemical processing. Most of these hazardous chemicals are found in the plastic housing of the electronic equipment to reduce flammability, insulating material, solder of printed circuit boards, glass panels, and gaskets of computer monitors, connectors and hard drives.

3.   General E-Waste Management

The general E-waste management practices shall include the following:
a) Waste minimization and prevention.
b) Identification and segregation of waste materials at source.
c) Recycling and reuse of suitable materials.
d) Treatment and disposal.

Effective planning and implementation of e-waste management strategies should include:
- The definition of opportunities for source reduction, as well as reuse and recycling.
- The definition of procedures and operational controls for on-site storage; and
- The definition of options / procedures / operational controls for treatment and final disposal.

Hazardous e-waste should always be segregated from non-hazardous e-waste. If generation of hazardous e-waste cannot be prevented through the implementation of the above general E-waste management practices, management shall focus on the prevention of harm to health, safety, and the environment, according to the following additional principles:

- Identification of hazardous e-waste and its separation from other waste until removal from site.
- Hazardous e-waste materials that are frequently generated in small quantities within the project's activities such as equipment and maintenance activities (examples of these types of e-waste include used batteries such as nickel-cadmium or lead acid, and lighting equipment, such as lamps or lamp ballasts, servers, computers, cables, etc), should be managed following the guidance provided in the above sections.

- Ensuring that contractors handling, treating, and disposing of hazardous e-waste are reputable and legitimate enterprises, licensed and following good industry practices.
- Ensuring compliance with applicable local and international regulations.

4.   E-Waste minimization and prevention

This has been designed and shall be operated to prevent, or minimize, the quantities of e-waste generated, and hazards associated with the e-waste generated in accordance with the following strategies:
- Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as e-Waste.
- Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs; and
- Minimizing hazardous e-waste generation by implementing stringent waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed.

5.   Segregation of E-waste

The Benefiting firms under Techstart project shall characterize, segregate and sort the E-waste at sources of generation according to composition, source, types of e-waste produced, or according to local regulatory requirements.

6.   Recycling and Reuse of E-waste

In addition to the implementation of e-waste prevention strategies, the total amount of e-waste may be significantly reduced through the implementation of recycling and re-use plans to be done by a licensed firm [Insert a recycling facility name]that shall be contracted by beneficiary which should consider the following:

- Identification and recycling of products that can be reintroduced into the operational processes and or increase its lifetime.

7.   Treatment and Disposal of E-waste

In cases when e-waste is still generated after the implementation of feasible e-waste prevention, reduction, reuse, recovery and recycling measures, e-waste materials should be treated and disposed of, and all measures should be taken to avoid potential impacts to human health and the

environment. Selected management approaches include timely removal, treatment and/or disposal at permitted/ approved facilities [Insert an authorized disposal facility name] specially designed to receive the e-waste.

8.   Storage of E-Waste

Hazardous e-waste shall be stored so as to prevent or control accidental releases to air, soil, and water resources in an area location where:

*   E-waste is stored in closed containers (some could be radioactive proof), away from direct sunlight, wind and rain).
*   E-waste is stored in a manner that prevents the mixing or contact between incompatible e-waste and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatibles or physical separation such as walls or containment curbs;
*   Provision of readily available information on compatibility to employees, including labelling each container to identify its contents.
*   Limiting access to hazardous e-waste storage areas only to employees who have received proper training;
*   Clearly identifying (label) and define the area, including documentation of its location on a facility map or site plan, plan'; and
*   Conducting periodic inspections of e-waste storage areas and documenting the findings.

9.   Transportation of E-Waste

All e-waste containers designated for off-site transport shall be secured and labelled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site, and be accompanied by an E-waste transfer note (i.e., manifest) that describes the load and its associated hazards, consistent with the Transport of Hazardous Materials good practices and guidance. The transport of e-waste should be through a contracted registered e-waste handler [Insert a registered e-waste handler].

10.   Monitoring

Monitoring of Activities

When significant quantities of hazardous e- wastes are generated and stored on site, monitoring activities shall include:

*   Regular visual inspection of all e-waste storage collection and storage areas for evidence of accidental releases and to verify that e-waste is properly labelled and stored.
*   Inspection of loss or identification of cracks, corrosion, or damage to protective equipment, or floors.

- Verification of locks, and other safety devices for easy operation (lubricating if required and employing the practice of keeping locks and safety equipment in standby position when the area is not occupied).
- Documenting any changes to the storage facility, and any significant changes in the quantity of materials in storage.
- Regular audits of e-waste segregation and collection practices.

Monitoring of Records

Monitoring records for hazardous e-waste collected, stored, or transported shall include:
- Name and identification number of the material(s) composing the hazardous e-waste or Physical state.
- Quantity (i.e., kilograms, number of containers).
- E-waste transport tracking documentation shall include, quantity and type, date dispatched, date transported, and date received, record of the originator, the receiver and the transporter.
- Method and date of storing, repacking, treating, or disposing at the facility, cross-referenced to specific manifest document (e-waste transfer notes) numbers applicable to the hazardous e-waste, or the Location of each hazardous e-waste within the facility, and the quantity at each location.

Template E-Waste Management Plan is provided in Annex A
E- waste disposal Inspection records shall be maintained and provided to Techstart team upon request (Template is provided in Annex C).

Annex A: E-Waste Management Plan

Proposed E-Waste Management Plan for Beneficiaries under Techstart Project

Impact	Mitigation	Monitoring	Responsibility	Budget
Air Pollution through improper disposal Which leads to release of toxic, hazardous, carcinogenic gases. **Human Health impact due to poor disposal** Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully. **Pollution of land resources including landfills** Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully. **Pollution of water bodies** Electrical and electronic equipment contain different hazardous materials, which are harmful to human health and the environment if not disposed of carefully. **Growth of informal E- waste disposal centers** Improper and indiscriminate disposal of E-waste is likely to lead	• Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as e-Waste. • Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs; and • Implement stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed. • Identify and recycle some of the ICT products that can be reintroduced into the operational processes. • Establish E-waste collection centers, including collection bins, receptacles. • Contract a licensed E-waste firm to timely remove E-waste form the firm for treatment and / or disposal at permitted facilities.	• Warranty for electronic devices purchased. • Review of procurement evaluation report for the manufacturers suppling the electronic devices. • Availability of E-waste receptacles for collecting e-waste. • Records of good housekeeping and visual inspection. • Certificate of disposal of E-wastes given by a licensed E-waste firm, stating that E-waste from the project has been successfully disposed of. • Number of awareness and trainings conducted for users of electronic devices on E-waste management.	Implemented by the beneficiary, and checked by ESO.	The Beneficiary is responsible to cover the cost of implementing the measures.

to the mushrooming of informal waste disposal centers in neighborhoods which further exacerbates the problem of E-waste.	• Conduct awareness for the users of electronic devices to ensure that they engage in best practices for e waste management.			

Annex B: List of Common E-Waste Items

The following is a list of common office E-waste items - among others:

- Desktop Computers
- Computer Monitors
- Laptops
- Circuit boards
- Hard Drives
- Fax machines
- Copiers
- Printers
- Remote Controls
- Electrical Cords
- Lighting equipment
- IT Servers
- Cords and Cables
- WiFi Dongles
- Audio & Video Equipment
- Network Hardware (i.e. servers, switches, hubs, etc.)
- Power Strips & Power Supplies
- Uninterrupted Power Supplies (UPS Systems)
- Power Distribution Systems (PDU's)
- Cell phones
- Smartphones

Annex C: Inspection

The following form must be filled by the benefiting firm and checked by the Environmental and Social Officer (ESO) at PIA for the compliance with e-waste management.

E-waste Type Generated	Segregated		Stored		Recycled		Disposed		Satisfactory	
	Y	N	Y	N	Y	N	Y	N	Y	N

Prepared by ……   Checked by……

Benefiting Firm   PIA ESO

Date   Date: