



ENVIRONMENTAL AND SOCIAL POLICY

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List of Abbreviations

ACTS : African Centre for Technology Studies

E&S : Environmental and Social

ESMS : Environmental and Social Management System

FPIC : Free, Prior and Informed Consent

IPP : Indigenous Peoples Plan

PSHEA : Prevention of Sexual Harassment, Exploitation and Abuse

1. Introduction

The African Centre for Technology Studies (ACTS) is an intergovernmental policy research institute that undertakes research, capacity development, knowledge generation, policy engagement and related activities to advance sustainable development in Africa.

ACTS recognises that its activities, programmes, projects, partnerships and operations may generate environmental and social risks and impacts. These may vary according to the nature, scale, location and context of an activity and may affect workers, communities, stakeholders and the environment.

ACTS is therefore committed to identifying, avoiding and, where avoidance is not possible, minimising and managing adverse environmental and social (E&S) risks and impacts while enhancing positive environmental and social outcomes.

This Environmental and Social Policy establishes ACTS's overarching commitments and principles for managing E&S risks and impacts across its institutional operations, programmes, projects and partnerships. The Policy is implemented through the ACTS Environmental and Social Management System (ESMS), which provides the institutional framework, procedures, tools and responsibilities required to operationalise these commitments.

2. ACTS Commitment

ACTS is committed to conducting its activities in a manner that:

- (i) protects people, communities and the environment;
- (ii) respects human rights and promotes dignity, equality and non-discrimination;
- (iii) identifies and manages environmental and social risks and impacts proportionately to their nature and significance;
- (iv) avoids, minimizes and mitigates adverse environmental and social impacts and enhances positive impacts where practicable;
- (v) promotes safe, healthy and inclusive working environments;
- (vi) prevents and addresses sexual harassment, exploitation and abuse and other forms of prohibited conduct;
- (vii) promotes meaningful stakeholder engagement and considers the views and concerns of affected and interested stakeholders;
- (viii) complies with applicable laws, regulations, contractual obligations and relevant institutional requirements;
- (ix) promotes responsible resource use, pollution prevention and environmental sustainability;

- (x) integrates environmental and social considerations into institutional decision-making and project planning;
- (xi) promotes accountability, transparency, learning and continuous improvement;
- (xii) Cultural Heritage: ACTS will identify and manage risks and impacts to tangible and intangible cultural heritage associated with its activities. ACTS will seek to avoid adverse impacts on cultural heritage and, where avoidance is not possible, implement appropriate mitigation measures in consultation with affected stakeholders and relevant authorities. Where applicable, ACTS will establish and implement chance-find procedures for activities that may encounter previously unidentified cultural heritage; and
- (xiii) Grievance mechanism: ACTS will maintain accessible, inclusive, culturally appropriate, transparent and responsive grievance mechanisms through which affected communities, stakeholders and workers may raise concerns regarding environmental and social risks and impacts. Grievance mechanisms will be available at no cost to users, protect confidentiality where appropriate, prohibit retaliation, provide clear processes and timelines for response, and be proportionate to the nature and scale of the activity.

ACTS will apply these commitments proportionately, taking into consideration the nature, scale, complexity, duration, location and potential significance of environmental and social risks and impacts associated with its activities.

3. Purpose

The purpose of this Environmental and Social Policy is to establish ACTS's institutional commitment and overarching approach to environmental and social sustainability and risk management. Specifically, the Policy seeks to establish principles for identifying and managing E&S risks and impacts; provide a consistent institutional basis for integrating E&S considerations into ACTS's decision-making; clarify institutional responsibilities and accountability for E&S performance; provide the foundation for ACTS's Environmental and Social Management System; support compliance with applicable national and international requirements and relevant financing and partnership obligations; and promote environmentally and socially responsible outcomes across ACTS's activities.

4. Scope and Application

This Policy applies to all ACTS's institutional activities and operations. These includes:

- a) research and policy studies;
- b) programmes and projects implemented or managed by ACTS;

- c) capacity development, training and knowledge-sharing activities;
- d) fieldwork, community engagement and stakeholder activities;
- e) procurement and contracting activities, where relevant to E&S risks;
- f) physical facilities and institutional operations;
- g) partnerships and collaborative activities, where ACTS has responsibility or influence over associated E&S risks; and
- h) activities financed, managed or implemented with external funding where E&S requirements apply;

Where ACTS serves as a fund manager, implementing entity, intermediary or partner, the application of this Environmental and Social Policy will be determined in accordance with the applicable financing arrangements, delegated responsibilities and the ACTS ESMS.

Where requirements of applicable law, financing agreements or other binding obligations differ, ACTS will apply the more stringent requirement where legally permissible and appropriate.

5. Environmental and Social Objectives

Through its activities and operations, ACTS pursues the following environmental and social objectives:

Objective 1: To prevent and minimize adverse environmental impacts arising from its operations and activities and promote efficient use of natural resources.

Objective 2: To identify and manage risks to the health, safety, security and wellbeing of workers, participants, communities and other stakeholders who may be affected by its activities.

Objective 3: To fair, safe, inclusive and respectful working conditions and to compliance with applicable labour requirements.

Objective 4: To respects internationally recognized human rights and will seek to prevent discrimination, harassment, exploitation and other forms of abuse within its activities and operations.

Objective 5: To promote meaningful, inclusive, and timely engagement with stakeholders who may be affected by or have an interest in its activities.

Objective 6: To maintain appropriate mechanisms through which concerns and grievances relating to its activities can be raised, considered, and addressed.

Objective 7: To maximize positive environmental and social contributions through its research, policy engagement, capacity development, and other activities, consistent with its institutional mandate.

6. Core Principles

In managing environmental and social risks and impacts, ACTS will apply the following principles:

Principle 1: A Risk-based and proportionate approach

Environmental and social risks and impacts will be assessed according to their nature and significance. The depth of assessment, management measures and monitoring will be proportionate to the level of risk.

Principle 2: Avoidance and mitigation

ACTS will prioritise the avoidance of significant adverse E&S impacts. Where avoidance is not possible, risks and impacts will be minimised, mitigated and managed through appropriate measures.

Principle 3: Precaution

Where there is a risk of serious or irreversible environmental or social harm, ACTS will apply appropriate precautionary measures, taking into account available evidence and the institutional context.

Principle 4: Do no harm

ACTS will seek to ensure that its activities do not cause avoidable harm to people, communities, or the environment.

Principle 5: Human rights and dignity

ACTS will respect human dignity and internationally recognised human rights in the conduct of its activities.

Principle 6: Inclusion and non-discrimination

ACTS will promote equal opportunity, inclusion and non-discrimination and will consider the needs of groups that may experience heightened vulnerability or barriers to participation.

Principle 7: Meaningful stakeholder participation

ACTS will seek to engage stakeholders in a manner that is timely, accessible, culturally appropriate and responsive to the nature and context of the activity.

Principle 8: Transparency and accountability

ACTS will promote transparency regarding relevant E&S risks, management measures and institutional performance, subject to legitimate confidentiality and data protection requirements.

Principle 9: Compliance

ACTS will comply with applicable environmental, social, labour, health and safety, human rights and other relevant legal and regulatory requirements.

Principle 10: Continuous improvement

ACTS will periodically review its E&S performance and strengthen its systems, practices and institutional capacity based on experience, monitoring findings, stakeholder feedback and emerging good practice.

Alignment with International Environmental and Social Standards

ACTS is committed to applying the International Finance Corporation (IFC) Performance Standards 1- 8, as the applicable environmental and social safeguards framework in a manner proportionate to the nature, scale, complexity and significance of the environmental and social risks and impacts of an activity.

ACTS will also comply with applicable national environmental and social laws and regulations. Where national requirements and applicable IFC requirements differ, ACTS will seek to meet the more stringent requirement, to the extent legally permissible and appropriate.

The ACTS ESMS establishes the procedures, tools and responsibilities for assessing and managing risks against the applicable IFC Performance Standards and for documenting the basis for risk categorisation, mitigation and monitoring.

7. Policy Commitments

To give effect to these principles, ACTS commits to the following:

- i) ACTS will identify and assess relevant environmental and social risks and impacts associated with activities within the scope of this Policy. The assessment and management approach will be proportionate to the potential level of risk and will inform decision-making, planning and implementation. Detailed screening, assessment, categorization and management requirements will be established under the ACTS ESMS.

- ii) ACTS will promote responsible environmental management through, efficient use of energy, water and other resources; reduction and responsible management of waste; pollution prevention and control; consideration of climate-related risks and opportunities; environmentally responsible procurement and operations; and promotion of sustainable practices within relevant programmes and projects.
- iii) ACTS will promote fair and safe working conditions and will seek to prevent forced or compulsory labour; child labour; discrimination and unequal treatment; workplace harassment and abuse; and unsafe working conditions. ACTS will provide appropriate mechanisms for workers and other relevant persons to raise workplace concerns. ACTS will identify and manage health and safety risks associated with its activities, including risks arising from fieldwork, travel, events, facilities and engagement with communities. Where relevant, ACTS will also consider potential health and safety risks to communities and other persons affected by its activities.
- iv) ACTS maintains a zero-tolerance approach to sexual harassment, exploitation and abuse and other forms of prohibited conduct. This Policy will be implemented alongside ACTS's Safeguarding and Prevention of Sexual Harassment, Exploitation and Abuse (PSHEA) Policy, which establishes more detailed institutional requirements for prevention, reporting, response, safeguarding and accountability.
- v) ACTS will integrate gender equality and social inclusion considerations into relevant activities and decision-making. This Policy will be implemented alongside the ACTS Gender Mainstreaming Policy, which provides more detailed requirements and approaches for integrating gender considerations across institutional activities.
- vi) ACTS recognises stakeholder engagement as an important component of responsible environmental and social management. Where relevant, ACTS will identify affected and interested stakeholders; provide accessible and timely information; enable meaningful participation; consider stakeholder views in decision-making; provide appropriate opportunities for concerns to be raised; and maintain appropriate records of engagement. Detailed stakeholder engagement requirements will be established through the ACTS ESMS and applicable project-level instruments.
- vii) ACTS will maintain accessible mechanisms through which workers, communities, project participants and other relevant stakeholders may raise concerns or grievances relating to activities within the scope of this Policy. Grievance mechanisms will be designed to be accessible, transparent, culturally appropriate, and responsive, while protecting confidentiality and preventing retaliation. Where applicable, ACTS will also provide appropriate referral and escalation mechanisms.
- viii) ACTS will consider whether individuals or groups may face heightened risks or barriers because of their circumstances, vulnerability or limited ability to participate. Where such risks are identified, ACTS will take reasonable measures to promote equitable participation and prevent disproportionate adverse impacts.

- ix) Where activities may affect cultural heritage, community resources or other culturally significant assets, ACTS will identify and manage such risks in accordance with applicable law and relevant good practice.
- x) Where relevant to the nature and location of an activity, ACTS will consider potential impacts on biodiversity, ecosystems and natural resources and promote measures to avoid or minimise adverse impacts.
- xi) ACTS will manage information arising from E&S assessments, stakeholder engagement, grievances and related processes responsibly and in accordance with applicable data protection, confidentiality and information management requirements.
- xii) ACTS will consider relevant E&S risks when establishing and managing partnerships, contracts and other collaborative arrangements. Where appropriate, ACTS will communicate applicable E&S requirements to partners, contractors and other relevant parties and incorporate appropriate responsibilities into agreements.
- xiii) ACTS will promote responsible research practices and seek to ensure that research, knowledge-generation and policy activities consider relevant ethical, environmental and social implications.

Biodiversity and Sustainable Management of Living Natural Resources

ACTS will assess and manage risks and impacts on biodiversity, ecosystems and ecosystem services associated with its activities. ACTS will seek to avoid adverse impacts on biodiversity and critical natural habitats and, where avoidance is not possible, minimise and mitigate such impacts in accordance with applicable national requirements and the relevant IFC Performance Standard requirements.

Where activities involve the use or management of living natural resources, ACTS will promote their sustainable management and consider applicable ecosystem, biodiversity and resource-use risks.

Land Acquisition and Involuntary Resettlement

ACTS will seek to avoid involuntary resettlement and, where avoidance is not possible, minimise physical and economic displacement. Where activities may result in land acquisition, restriction of access to resources or involuntary resettlement, ACTS will undertake appropriate assessment and apply measures for compensation, livelihood restoration and resettlement consistent with applicable national requirements and the relevant IFC Performance Standard requirements.

7.1 Indigenous People

ACTS recognises the rights, identities, cultures, livelihoods, knowledge systems and development priorities of Indigenous Peoples and is committed to respecting and protecting these rights in activities that it finances, implements, manages or supports.

ACTS will apply the following commitments in relation to Indigenous Peoples:

7.1.1 Identification and screening of Indigenous People

ACTS will identify whether Indigenous Peoples may be present in, have collective rights over, or may be affected by a proposed activity during the environmental and social screening and appraisal process.

Where Indigenous Peoples may be affected, ACTS will assess the nature and significance of potential environmental and social risks and impacts and determine the appropriate level of due diligence, consultation, mitigation and monitoring. The ESMS will establish procedures and tools for screening and assessing risks and impacts on Indigenous Peoples.

7.1.2 Meaningful consultation and participation

ACTS is committed to meaningful, inclusive and culturally appropriate consultation and participation with potentially affected Indigenous Peoples.

Consultation will be undertaken in a timely manner and throughout relevant stages of the activity lifecycle, in a culturally appropriate and accessible manner, in good faith and free from coercion, intimidation or manipulation, with information provided in an understandable and accessible form and with appropriate consideration given to the views, concerns and priorities expressed by affected Indigenous Peoples.

ACTS will recognise appropriate Indigenous Peoples' representative institutions and decision-making processes when engaging with affected communities.

7.1.3 Free, Prior and Informed Consent

Where required, ACTS will seek and document Free, Prior and Informed Consent (FPIC) from affected Indigenous Peoples.

ACTS will ensure that FPIC processes are initiated sufficiently in advance of decisions or activities that may affect Indigenous Peoples, based on information that is accessible, understandable and relevant, free from coercion, intimidation or manipulation, undertaken through culturally appropriate processes and legitimate representative institutions and appropriately documented.

Where FPIC is required, activities will not proceed without the applicable consent process being completed, subject to the requirements and circumstances established under the ACTS processes and applicable law. The detailed process for determining when FPIC is required and how it is undertaken and documented will be established in the ESMS.

7.1.4 Protection of Indigenous Peoples' rights and cultural heritage

ACTS will seek to avoid adverse impacts on Indigenous Peoples' rights, lands, territories, resources, livelihoods, cultural heritage, traditional knowledge and cultural practices. Where adverse impacts cannot reasonably be avoided, ACTS will require appropriate measures to minimise, mitigate and, where applicable, remedy such impacts.

ACTS will pay particular attention to activities that may affect customary or collective rights over land and natural resources, traditional livelihoods, cultural heritage and sacred sites, traditional knowledge and practices, community health, safety and wellbeing, and the rights and participation of Indigenous women, youth and other potentially vulnerable groups.

7.1.5 Indigenous Peoples and gender

ACTS recognises that Indigenous women and other groups within Indigenous communities may experience differentiated risks, barriers to participation or impacts. Where relevant, E&S assessments and stakeholder engagement processes will therefore consider gender and other intersecting dimensions of vulnerability and ensure that Indigenous women and other relevant groups have appropriate opportunities to participate in consultation and decision-making.

This commitment will be implemented consistently with the ACTS Gender Mainstreaming Policy.

7.1.6 Grievance redress

ACTS will ensure that appropriate grievance mechanisms are available to Indigenous Peoples who may be affected by its activities.

Such mechanisms will be accessible and culturally appropriate, responsive to the needs and circumstances of affected Indigenous Peoples, available without cost or fear of retaliation, designed to protect confidentiality where appropriate, and complementary to, and respectful of, customary or traditional dispute resolution mechanisms where appropriate.

The existence of a project-level grievance mechanism will not prevent Indigenous Peoples from accessing judicial, administrative or other legitimate grievance and remedy mechanisms. Detailed grievance procedures will be established through the ACTS ESMS and, where appropriate, project-level instruments are.

ACTS will maintain accessible, inclusive, culturally appropriate, transparent and responsive grievance mechanisms through which affected communities, stakeholders and workers may

raise concerns regarding environmental and social risks and impacts. Grievance mechanisms will be available at no cost to users, protect confidentiality where appropriate, prohibit retaliation, provide clear processes and timelines for response, and be proportionate to the nature and scale of the activity.

7.1.7 Indigenous Peoples planning and mitigation

Where screening and assessment identify significant risks or impacts on Indigenous Peoples, ACTS will require appropriate measures to manage those risks. Depending on the nature and significance of the impacts, these may include an Indigenous Peoples Plan (IPP) or other appropriate project-level instrument. Such instruments will establish measures for avoidance, minimisation, mitigation, benefit sharing, stakeholder engagement, monitoring and grievance management, as appropriate.

7.1.8 Institutional capacity and specialized expertise

ACTS will maintain appropriate internal capacity and competency to identify and assess risks and impacts on Indigenous Peoples during the development and appraisal of relevant concepts, funding proposals, programmes and projects.

Where specialised knowledge or expertise is required, ACTS will seek appropriate technical support or engage suitably qualified specialists to support screening, assessment, consultation, FPIC processes, mitigation and monitoring.

Relevant staff and project teams will receive appropriate orientation or capacity development on Indigenous Peoples requirements where their responsibilities require such knowledge.

7.1.9 Integration into the ESMS

The ACTS ESMS will establish the operational procedures required to implement this Policy commitment.

This includes screening for the presence of Indigenous Peoples and potential impacts, risk and impact assessment, determination of when enhanced due diligence is required, meaningful consultation and participation, determination and documentation of FPIC requirements, preparation and implementation of Indigenous Peoples Plans or equivalent instruments, where required, gender-responsive engagement, grievance and remedy mechanisms, monitoring and reporting; and documentation and record keeping.

ACTS will maintain appropriate evidence demonstrating the application of these procedures to relevant activities.

8. Governance and Responsibilities

8.1 Governing Council

The ACTS Governing Council has overall oversight responsibility for this Policy and:

1. approves the Environmental and Social Policy;
2. provides strategic oversight of E&S performance;
3. ensures that appropriate institutional arrangements are in place; and
4. reviews significant E&S issues brought to its attention.

8.2 Executive Director

The Executive Director is responsible for ensuring institutional implementation of this Environmental and Social Policy and will:

1. provide leadership and resources for ACTS' E&S management;
2. ensure that E&S considerations are integrated into ACTS' institutional decision-making;
3. oversee implementation of ACTS' ESMS;
4. ensure appropriate assignment of responsibilities; and
5. report significant ACTS E&S matters to the Governing Council as appropriate.

8.3 Environmental and Social Management Function

ACTS establishes a standing ESMS committee to coordinate implementation of the ESMS. The committee supports:

1. ACTS' E&S screening and risk assessment;
2. Application of ACTS' ESMS;
3. Technical guidance to ACTS' programmes and projects;
4. ACTS' E&S monitoring and reporting;
5. Capacity development on E&S;
6. Documentation and record keeping of ACTS' E&S;
7. Stakeholder and grievance processes, as appropriate; and
8. Continuous improvement of the ACTS E&S management system.

8.4 Programme and Project Teams

ACTS' Programme and project teams are responsible for applying relevant E&S requirements to activities under their management. They will also identify potential E&S risks, implement agreed management measures, engage relevant stakeholders, document E&S performance, and report incidents, concerns, and material changes in E&S risk.

8.5 All ACTS Staff and Associated Personnel

All ACTS staff, consultants, contractors and other relevant personnel are to comply with applicable institutional E&S requirements and to report E&S concerns, incidents or suspected non-compliance through established channels.

9. Implementation and ACTS' Environmental and Social Management System

ACTS will implement this Policy through its Environmental and Social Management System (ESMS). The ACTS ESMS provides the operational framework for translating the commitments in this Policy into practice. It establishes procedures, responsibilities, tools and controls for managing environmental and social risks throughout the relevant activity lifecycle.

The ACTS ESMS addresses:

- (i) E&S screening and risk categorisation;
- (ii) risk and impact assessment;
- (iii) identification and implementation of mitigation measures;
- (iv) environmental and social management plans and other management instruments;
- (v) stakeholder engagement;
- (vi) grievance management;
- (vii) incident and non-compliance management;
- (viii) monitoring and reporting;
- (ix) roles, responsibilities and capacity requirements;
- (x) documentation and record keeping;
- (xi) supervision and oversight; and
- (xii) periodic review and improvement.

The ACTS ESMS will be maintained as a separate operational framework and may be supported by procedures, guidelines, templates and tools approved by ACTS governing council and management. Where appropriate, project-specific E&S instruments will be developed based on the risks and requirements identified through the ESMS.

10. Monitoring, Reporting and Continuous Improvement

ACTS will monitor the implementation of this E&S Policy and the effectiveness of its ESMS.

Monitoring will be proportionate to the nature and level of E&S risks and may include implementation of mitigation measures, E&S incidents and corrective actions, stakeholder

engagement, grievances and their resolution, compliance with applicable requirements, staff and institutional capacity, project-level E&S performance and effectiveness of the ESMS.

Relevant E&S performance information will be reported through appropriate institutional and project-level reporting mechanisms. ACTS will use monitoring findings, lessons learned, stakeholder feedback, incidents and emerging risks to strengthen its E&S management practices. Where deficiencies are identified, ACTS will implement appropriate corrective and preventive actions.

11. Disclosure and Communication

ACTS is committed to appropriate transparency and communication regarding its environmental and social commitments and performance. This E&S Policy will be made available to relevant staff, partners, and stakeholders through the ACTS website.

Where required by applicable law, financing agreements or project-specific requirements, relevant E&S information will be disclosed to affected and interested stakeholders in an accessible and timely manner. Disclosure will take into account confidentiality, privacy, data protection, and legitimate institutional interests.

12. Review of the Policy

This E&S Policy will be reviewed every three years, or earlier where significant changes in ACTS's mandate, operations, legal requirements, financing arrangements, institutional risks or international good practice warrant a review.

Reviews will consider implementation experience, monitoring and reporting findings, stakeholder feedback, changes in applicable legal and regulatory requirements, requirements of relevant funding and financing partners, lessons from incidents and corrective actions and developments in international environmental and social sustainability practices.

Any substantive amendments to this E&S Policy will be subject to approval through ACTS's established governance arrangements.

13. Related Policies

This Policy should be read together with relevant ACTS institutional policies, procedures and frameworks, including, ACTS Prevention of Sexual Harassment, Exploitation and Abuse (PSHEA) Policy, ACTS Gender Mainstreaming Policy, ACTS Research Ethics and Integrity requirements, ACTS Procurement and Financial Management policies, ACTS Data Protection and Information Management requirements and other relevant institutional policies and procedures.

Where a related policy provides more detailed requirements for a specific environmental or social issue, that policy will continue to apply alongside this overarching ACTS Environmental and Social Policy.