

# ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

For the Preparation of Design, Bidding Documents  
Supervision and POC for the Rehabilitation  
and Rehabilitation of the Canaries Wellness Centre

ESMP



Executed By:



**THE WORLD BANK**  
IBRD • IDA

The Government of St. Lucia  
Ministry of Health, Wellness and International Bank  
for Reconstruction & Development

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## ACRONYMS AND ABBREVIATIONS

<b>BOQ</b>	Bill of Quantities
<b>CARPHA</b>	Caribbean Public Health Agency
<b>CFP</b>	Chance Finds Procedure
<b>CoC</b>	Code of Conduct
<b>DCA</b>	Development Control Authority
<b>EIA</b>	Environmental Impact Assessment
<b>EHD</b>	Environmental Health Department
<b>EMF</b>	Environmental Management Framework
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESHS</b>	Environmental Social Health and Safety
<b>E&amp;S</b>	Environmental and Social
<b>GRM</b>	Grievance Redress Mechanism
<b>H&amp;S</b>	Health and Safety
<b>HSI</b>	Health and Safety Index
<b>MoHWEA</b>	Ministry of Health Wellness and Elderly Affairs
<b>MOE</b>	Ministry of Equity
<b>NEMO</b>	National Emergency Management Organisation
<b>OSH</b>	Occupational Safety and Health
<b>PAHO</b>	Pan American Health Organisation
<b>PIU</b>	Project Implementation Unit
<b>SLSWMA</b>	St. Lucia Solid Waste Management Authority
<b>PCR</b>	Physical Cultural Resources
<b>PPD</b>	Physical Planning Department
<b>PPE</b>	Personal Protective Equipment
<b>RSLPF</b>	Royal St. Lucia Police Force
<b>SH</b>	Sexual Harassment
<b>SEA</b>	Sexual Abuse and Exploitation
<b>TOR</b>	Terms of Reference
<b>USD</b>	United States Dollars
<b>WBG</b>	World Bank Group

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## 1.0 Introduction And Background

Saint Lucia is faced with limited capacity and fiscal space, as well as high levels of exposure to economic and weather shocks. The country has had limited success in adequately preparing for public health emergencies. Recent extreme weather events such as Hurricanes Irma and Maria (2017) and regional outbreaks of Chikungunya (2014), Zika (2016) and more recently COVID-19, have highlighted weaknesses in the preparedness of health systems in the Eastern Caribbean region to manage public health emergencies with Saint Lucia being no exception.

Approved in August 2019, the OECS Regional Health Project aims to improve preparedness of health systems' capacities for public health emergencies across four countries (Dominica, Grenada, Saint Lucia, and Saint Vincent and the Grenadines) and two regional agencies (OECS Commission and the Caribbean Regional Public Health Agency (CARPHA)).

The overall project finances activities through two main components: (i) improved health facilities and laboratory capacity; and (ii) strengthened public health surveillance and emergency management. This specific project deals with component (i). The SMART Hospital Project was funded by the UK Foreign, Commonwealth & Development Office and implemented by the Pan American Health Organisation (PAHO). The project sought to develop resilient and climate-adapted healthcare facilities in the Caribbean. The tools used to assess the facilities are the Health and Safety Index (HSI) which is a series of questions when answered, provides a snapshot of the level of vulnerability of a health facility to hazard with levels rating as follows:

- A - 65% -100%
- B - 64%-45%
- C - Below 45%

To assess the 'greenness' of a facility, the level of adaption to climate change and mitigation measures for reducing its carbon footprint, the Green-checklist was utilised. The minimum green standard was set at 70%.

In order for a facility to be considered SMART, it, therefore, has to earn an alpha-numeric score of A70. The first phase of the SMART Healthcare Initiative PAHO completed two demonstration projects, one at the Georgetown Hospital in St. Vincent, and the other at the Pogson Medical Centre in St. Kitts and Nevis. Both demonstration projects aimed to establish an integrated approach to health facility design, featuring both disaster-resilient (safe) and environmentally green (green) institutions. The success of Phase I expanded to Phase II in which more islands were involved, namely Grenada, Saint Lucia, St. Vincent, and Dominica. The project started in Saint Lucia in 2013, where the various government departments were trained in the HSI and Green Tool Kit and assessed thirty-four facilities. In Saint Lucia, the results of this assessment led to the rehabilitation of thirteen (13) health facilities on the island to date. The Ministry of Health Wellness and Elderly Affairs (MoHWEA) is at the end of the Construction Phase of the Smart Health Facilities project in Saint Lucia. In July 2020, the Department conducted re-assessments of the health facilities as per the original project five (5) year cycle. This coincided with the end of the project cycle, which requires a reassessment of the facilities that were retrofitted under the SMART Project. The

reassessments included the application of the health safety index (HSI) and green checklist questionnaires for thirty-two (32) additional health facilities.

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## 2.0 PROJECT DESCRIPTION

This section provides additional description and background information on the rehabilitation of the Canaries Wellness Centre.

### 2.1 Project Context

Canaries is a coastal fishing village located on the west coast of Saint Lucia. In 2022, the estimated population of Canaries was 2,171 persons. Canaries is generally considered to be a deprived community in Saint Lucia. The 2016 National Report on Living Conditions found that 38% of the residents of Anse la Raye/ Canaries live below the national poverty line<sup>1</sup>.



*Figure 1 Location of the site within Canaries Village*

The village has inadequate toilet facilities and sanitation. Many households in the village do not have toilet and sanitation facilities, with public toilet facilities, the use of toilets at institutional buildings and open defecation at the Canaries River mouth being the main means of sewage disposal. A 2016 assessment also found that many existing septic tanks lack soakaway systems and overflowed directly into the existing storm drain network

The Canaries Wellness Centre is the only healthcare facility in this area. The project entails the implementation of upgrades to improve the functionality of the clinic, improve its structural soundness and make it a greener facility, by improving its energy efficiency.

<sup>1</sup> [https://stats.gov.lc/wp-content/uploads/2019/01/Summary-Report-Saint-Lucia-2016-National-Report-of-Living-Conditions\\_December-2018.pdf](https://stats.gov.lc/wp-content/uploads/2019/01/Summary-Report-Saint-Lucia-2016-National-Report-of-Living-Conditions_December-2018.pdf)

## 2.2 Project Scope

The rehabilitation of the Canaries Wellness Centre includes:

- 1) Construction of new housing for the standby generator and demolition of existing raised pad for generator
- 2) Construction of approximately 200 sq ft of roof connecting the Staff Building to the Wellness
- 3) Installation of a new ramp
- 4) Demolition and reconstruction of a pad for housing water tanks
- 5) Rewiring of the electrical and communication systems in the building including the installation of energy-efficient luminaires, fire alarm, emergency signage, data outlets
- 6) Reconfiguration of internal partitions to improve functionality including the demolition of existing partitions and installation of new partitions
- 7) Improvements to HVAC
- 8) Replacement of bathroom fixtures, retrofitting of plumbing fixtures including demolition and replacement of sinks and water closets in five (5) bathrooms, demolition and replacement of sinks in pharmacy laundry and office in the wellness centre.



**Figure 2 Aerial photo of the Site**

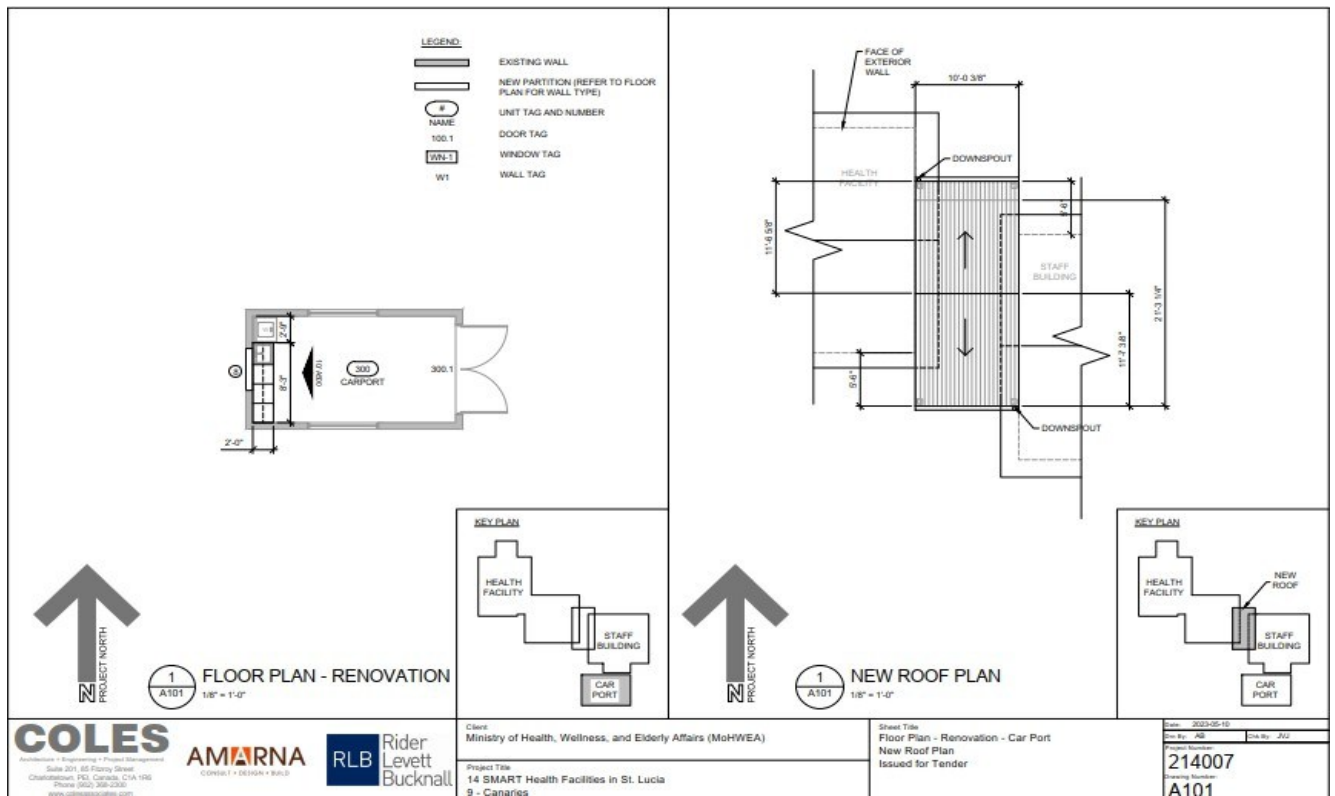
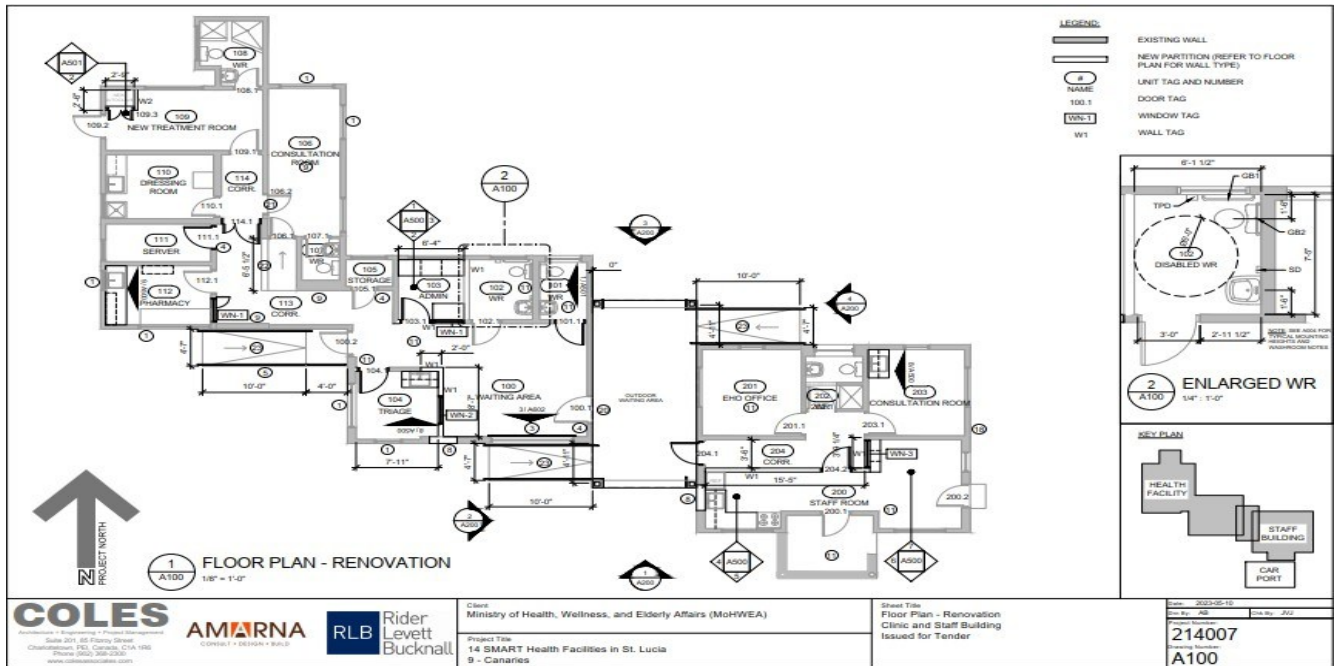


Figure 3. Canaries Wellness Centre Floor Pla

### **3.0 Site Specific Environmental and Social Impacts**

This section details the environmental and social impacts envisaged from the retrofit of the Canaries healthcare facility. Environmental and Social Impacts can generally be classified in a number of ways including:

1. Temporal: Short, medium or long term
2. Direct or Indirect
3. Positive or Negative
4. Localised or extensive
5. Magnitude: Major or Minor

The potential negative impacts of this activity are expected to be primarily the nuisance of increased noise, dust, and traffic on the community combined with the disruption of the healthcare services usually available to the community during the construction phase.

Personnel involved in construction activities will be exposed to typical risks associated with undertaking construction activities including the chance of injury from falls, burns, abrasions and electrocution and becoming adversely affected by exposure to chemicals and strong chemical odors. These risks will be mitigated through proper training and site management procedures and ensuring that personal protective equipment (PPE) is used at all times. In the event of an onsite incident, response plans will be executed to mitigate their impact on individuals and on the wider community.

Most of the negative impacts on the community are expected to be short term and minor.

The positive impacts of this activity are expected to be, better public health outcomes as a result of an improved healthcare facility in the medium- long term, and in the short term increased economic activity related to the renovation works being undertaken at the wellness centre. This may include the employment of persons from the community as well as increased sales for food vendors, and increased revenue for truckers and other service providers.

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### **4.0 Legal and Administrative Framework**

Table 4 below, extracted from the Environmental and Social Management Framework (ESMF) shows the local legislation and World Bank policy that relate to each of the environmental and social issues.

Area	Sections of County laws and policies relevant to this project	Corresponding WB policy and standard
EIA Scope	Physical Planning and Development Act 2005	OP 4.01 and annexes
Public health law	Public Health Act 2006	
Cultural heritage protection and procedures during construction	Saint Lucia National Trust Act 1975	OP 4.11 Cultural Heritage
Medical Waste Management and disposal	1. Public Health Act 2006 2. Solid Waste Management Authority Act 2004	OP 4.01 and annexes
Solid and liquid waste management	Solid Waste Management Authority Act 2004	OP 4.01 and annexes
Occupational health and safety	Employees (Occupational Health and Safety) Act 1985	OP 4.01 and annexes
Land acquisition	Land Acquisition Act 2008	OP 4.12 Involuntary Resettlement
Building code and standards	OECS Building Code and Guidelines	OP 4.01 and annexes
Zoning regulation	1. Physical Planning and Development Act 2001 2. Land Conservation and Improvement Act 1992	OP 4.01 and annexes
Grievance redress Mechanism/ complaint handling	Labour Code of 2006	OP 4.01 and annexes
Disclosure of documents	Freedom of Information Act 2009	OP 4.01 and annexes
Public consultation for social and Environmental Impact Assessments	Physical Planning and Development Act 2005	OP 4.01 and annexes

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## 5.0 Social and Environmental Safeguards

An environmental and social management plan is recommended for each of the projects under the OECS Regional Health Project, including the Canaries Wellness Centre to ensure that the projects are conducted responsibly, to minimise their impact on the environment and communities, and to achieve long-term sustainability goals. The plans are developed to:

- Ensure protection of the environment
- Manage community relations
- Manage environmental and social risks to the project
- Track progress towards sustainability goals

Progress will be monitored using the Pan American Organisation's 'Updated Green Checklist for Smart Facilities' (or a modified version of same) which is available on the World Health Organisation website (<https://www.paho.org/en/documents/updated-green-checklist-smart-facilities>).

The World Bank Group (WBG) has developed Safeguards Policies that guide the development of projects including the Regional OECS Regional Health Project. Most relevant to the Ti Rocher Wellness Centre Rehabilitation is the Operational Policy 4.01 (OP 4.01), which requires environmental and social assessment of any proposed project. Accordingly, the ESMF was prepared as a general guidance document, and to describe the process for screening works to determine whether they can be taken forward under the project and whether an ESMP or ESHSCOPs is needed. Following this process, this Environmental and Social Management Plan (ESMP) has been prepared for the specific activity of the health centre renovation, and describes how the E&S risks will be managed throughout the design, construction and operation of the upgraded health centre.

Several additional safeguards policies cover aspects such as land acquisition, public disclosure, natural habitat, and antiquities protection, among others.

**There is no possibility for involuntary resettlement of any kind during construction, since there is no land acquisition or temporary use of private lands during construction, neither is there any ongoing economic activity that will be affected at the proposed site for construction. Further the impacts of the works should be moderate and not have such adverse effects that would require relocation of any nearby groups or communities.**

More information can be found in the ESMF which is disclosed on <http://www.govt.lc/> or the WBG website.

The possible environmental and social impacts would have to be classified as moderate. However, these impacts can be addressed through standard mitigation measures, listed in tables in Section 4.0 during construction, as well as continuous consultation, communication, raising of public awareness before and during the construction period.

*EHS Guidelines*

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Environmental, Health and Safety (EHS) guidelines have also been prepared by the WBG. There are general guidelines that cover most activities related to construction projects for new facilities. Some parts of these general guidelines apply to the retrofitting activity, particularly such aspects as traffic safety, dust and noise control, worker health and safety, and control of runoff from work sites.

Of relevance to the rehabilitation are the sector-specific WBG guidelines for Healthcare Facilities, which cover waste minimization, waste segregation, handling and storage of wastes on site, transport to external facilities, and options for treatment and disposal. For more information, refer to the EHS Guidelines on the WBG website under the category of Healthcare Facilities.

6.0 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

6.1 Construction

Table 6.1 - List of Potential Environmental and Social Impacts and Mitigation Measures

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
<b>Flora and Fauna</b>	None	None	The Canaries Healthcare facility already exists and is only being renovated.	No mitigation is required onsite	
<b>Soil, Groundwater and Surface Water Resources</b>	Soil and Groundwater - Low  Surface Water Low	Low	The site is located about 37m from the bank of the Canaries River. Although this river is not a source of potable water, any contamination of the river would affect river fauna including fish and invertebrates and could also impact the coastal and marine environment, potentially affecting recreational uses of water as well as fisheries.  It should still be noted that water quality in Canaries is currently being impacted by inadequate sewage and sanitation infrastructure in the village.	<ul style="list-style-type: none"> <li>- Ensure that construction materials including aggregates, and chemicals such as paints, solvents, and stains are properly stored on site and disposed of.</li> <li>- stormwater runoff protection measures such as silt fencing, straw bales, sediment ponds or pits, etc. to ensure that sediment does not leave the site and impact any drains, rivers, or water bodies.</li> <li>- Monitor weather forecast to ensure sufficient time for securing onsite materials and equipment.</li> </ul>	- GCC 18.3 covers this requirement.

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
<p><b>Environmental damage caused by the workforce</b></p>	<p>Damage to the environment -- Low</p>	<p>Low</p>	<p>The Contractor may not follow neither enforce the Code of Conduct (CoC) if his/her employees are in breach.</p> <p>Contractor may not provide relevant training to the workforce.</p>	<p>The Contractor should take all steps to protect the environment on and off-site, and to avoid damage or nuisance to persons or property arising from pollution, noise or other issues arising as a consequence of his methods of operation, including the following:</p> <ul style="list-style-type: none"> <li>- Signing and enforcing the CoC.</li> <li>- Training workers on environmental issues and measures to be taken in the event that actions to protect the environment are necessitated,</li> <li>- Designating an employee to supervise and ensure environmental obligations are complied with.</li> <li>- Incorporating environmental and social issues into the agenda of regular meetings with workers.</li> <li>- Ordering immediate suspension or a halt to any activity which is causing, or is likely to cause significant environmental damage, and to commit to make good any such damage at his own expense, in accordance with the instructions of the relevant authorities.</li> <li>- Requiring the immediate and permanent dismissal from the site</li> </ul>	<p>GCC18.3 – Protection of the environment</p> <p>The CoC in section IV (bidding Forms) will apply.</p> <p>Appendix B and GCC 28 are relevant to the CoC as well as GCC 18.1, 18.2, 9.4.2, 30.3, and 30.4.</p> <p>A specification will be added to require the contractor to provide as a minimum the General Induction for Construction Workers with reference to GCC 9.4.20, as follows:</p> <p><i>In addition to GCC 9.4.20, as a minimum the general induction: General Induction for Construction Workers: Safety, Health and the Environment to be found here, <a href="https://www.wbgkgtf.org/node/3823">https://www.wbgkgtf.org/node/3823</a> shall be provided as training to all Contractor’s Personnel. Each Contractor’s Personnel shall receive the general induction prior to their start of any Works activity on site, and at least annually thereafter. Records of the general induction training provided shall be kept. The record shall include a copy of the induction given and as a minimum the</i></p>

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
				<p>of any member of the workforce who is committing acts prejudicial to the environment including theft or interference with property and offensive behaviour.</p> <ul style="list-style-type: none"> <li>- Providing and enforce worker use of appropriate, accessible toilet facilities and of appropriate solid waste disposal facilities.</li> </ul>	<p><i>following details:</i></p> <ul style="list-style-type: none"> <li>• <i>Name and signature (or mark) of trainee</i></li> <li>• <i>Employer/ organization they work for</i></li> <li>• <i>Date of induction training attended</i></li> </ul> <p>Inspection, supervision and enforcement will be done as per GCC 8.2, 9.2, 22.1 and 33.1.</p>
<b>Interruption of Healthcare Service during Renovation</b>	Moderate to Significant	Moderate	During the renovation which is expected to be completed in 5 to 6 months residents of Canaries Village and nearby communities will access healthcare services from a building in the Wellness Centre compound which will be retrofitted to provide services.	<ul style="list-style-type: none"> <li>- Implement an effective communication strategy to inform the public of the dates of closure and where healthcare services can be obtained during the closure.</li> <li>-</li> </ul>	<i>The PIU will undertake the communication with the public.</i>
<b>Air Quality degradation from dust and emissions</b>	Low-Moderate	Low- Moderate	Air quality in the community may be adversely affected particularly during external construction and demolition works and potentially due to the transportation of materials to and from the site.	<p>The Contractor shall ensure that:</p> <ul style="list-style-type: none"> <li>- Vehicles transporting material to and from the site will be covered.</li> <li>- Any accidental spills of materials on the road to and from the site will be cleared as soon as</li> </ul>	<i>Further to GCC 18.3 (b), a specification shall be included to require contractors to fit sheets over trucks transporting materials to and from the site, to prevent spillage on the public roads.</i>

Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Assessment	Required Mitigation	Relevant GCC/PCC
				<p>possible. In the event of oil spillage, cleanup should be conducted in conjunction with the Saint Lucia Fire Service. It should be noted that the nearest fire station is located in Anse la Verdue approximately 6-8 minutes away.</p> <ul style="list-style-type: none"> <li>- Aggregates stored on-site should be covered. Noxious chemical fumes are not envisaged based on the scope of work.</li> </ul>	<p><i>In addition, a specification shall be included to require the contractor to cover all materials stored on site, so that they do not create dust nuisance.</i></p>
<b>Noise Pollution</b>	Moderate	Low	<p>Canaries Village has a combination of residential, commercial and institutional uses. Truck trips to and from the site, the use of power tools and other noise related to construction will create some noise pollution in the community, particularly for properties adjacent to the site, particularly on High Street, where the vehicular and pedestrian entrances to the Clinic site are located.</p>	<p>The Contractor will ensure that:</p> <ul style="list-style-type: none"> <li>- Trucks and heavy-duty equipment should operate during regular working hours on weekdays to minimize disturbance to the public.</li> <li>- Onsite construction activities involving air compressors, jackhammers, power-driven drills, riveting machines, excavator, diesel-powered truck, tractor or other earth-moving equipment, hand hammers on steel or iron, or any other machine, tool, device or equipment which makes loud noises will not be used outside of regular weekday working hours, except in extraordinary circumstances or with the</li> </ul>	<p><i>GCC 18.3 Protection of the environment</i>  <i>(a) The Contractor shall take all necessary measures to: protect the environment (both on and off the Site); and</i>  <i>(b) limit damage and nuisance to people and property resulting from pollution, noise and other results of the Contractor's operations and/ or activities.</i></p>

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
<b>Traffic Management</b>	Moderate	Significant	<p>Streets in Canaries have relatively low levels of traffic daily. However, these streets are fairly narrow. Some Intersections will be challenging for dump trucks and other vehicles to navigate through the village.</p> <p>Large trucks and heavy-duty vehicles can damage the road surface of the streets in Canaries.</p> <p>Heavy-duty vehicles also pose a safety risk to pedestrians and other motorists in the community. Vehicles can also pose a hazard to personnel on the site, particularly from trucks reversing onto the site to deliver materials or pick up debris and waste.</p>	<p>expressed agreement of the Community.</p> <p>A A detailed traffic management plan should be developed to address traffic management, onsite and within the Canaries village. The plan should achieve the following goals:</p> <ul style="list-style-type: none"> <li>- Reduce interactions between vehicles and pedestrians</li> <li>- Minimise the number of vehicle movements in and around the site</li> <li>- Ensure that all personnel on site are trained and practice traffic safety guidelines</li> <li>- Reducing the need for vehicles to reverse wherever possible as reversing onsite can lead to fatal accidents</li> <li>- No parking or stockpiling of materials will be allowed along the public roadway.</li> <li>- No materials shall be stored so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public or result in</li> </ul>	<p><i>GCC 9.3 sets out the requirement for the contractor to put in place everything necessary for safe use of roads.</i></p> <p><i>GCC 9.3 sets out the requirement for the contractor to put in place everything necessary for safe use of roads.</i></p> <p><i>During preparation of the bid documents, a Specification will be prepared to require the contractor to submit a Traffic Management Plan and access management plan for the approval of the Project Manager, incorporating all of the components listed in the previous column.</i></p>

Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
			<ul style="list-style-type: none"> <li>- siltation or blockage of drains.</li> <li>- Contractor should plan for the temporary storage of construction materials and wastes, and the parking of construction plant within the worksite only. This will be part of the Site Management Plan.</li> <li>- Parking areas for employees' private vehicles will be located within the worksite only, in approved areas.</li> <li>- Ensure that pedestrians and drivers can see potential hazards, in some cases, personnel can be assigned to traffic management tasks onsite. Onsite personnel should wear high-visibility clothes and reflective vests.</li> <li>- Adequate lighting must be provided onsite particularly if work is to proceed after hours.</li> <li>- Installation of proper signage and instructions.</li> <li>- Compliance with all guidelines and protocols established by the Development Control Authority (DCA) the Department of Transport and Royal St. Lucia Police Force (RSLPF).</li> <li>- Inform the public of changes to</li> </ul>	

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
				traffic routes via public announcement and by posting signs in areas with high visibility.	
<b>Occupational Health and Public Health and Safety</b>	Moderate	Moderate	Construction workers on site are exposed to construction-related hazards including exposure to dust, pollutants and potential injury from falling objects, use of hand and power tools, and potential risk of electrocution.	<ul style="list-style-type: none"> <li>- The Contractor shall: Ensure that all staff are trained on safety best practices on a construction site.</li> <li>- Ensure that all persons entering the site have adequate PPE.</li> <li>- Ensure that at a minimum the contractor adopts and enforces a Health and Safety Plan.</li> </ul>	<i>GCC 18.2 – sets out the safety requirements that the contractor will comply with. Additionally, a specification will be included to require the Contractor to prepare an MSIP presenting measures to handle specific risks associated with the performance of tasks.</i>
<b>Exposure to VOCs</b>	Low	Low	Painting and the use of chemicals with strong odours including paints, thinners, caulks, sealants and varnishes can have an adverse effect on the construction team and other persons traversing the site.	<p>The Contractor will ensure:</p> <ul style="list-style-type: none"> <li>- Proper Use of PPE by employees</li> <li>- Scheduling painting for periods when the facility will be closed</li> <li>- Use of water-based paints where possible</li> </ul>	<i>GCC 18.2 – sets out the safety requirements that the contractor will comply with</i>  <i>GcC 18.3 is also applicable.</i>
<b>Hazards related to demolition</b>	Low – Moderate	Low	Minor internal and external demolition works are planned on this site. Although the scope of demolition is not significant, best practices must be employed to reduce the chances of adverse effects on the safety of the workers and the wider community.	<p>The Contractor will:</p> <ul style="list-style-type: none"> <li>- Install proper hoarding to prevent the spread of debris and dust into the community.</li> <li>- Completion of demolition works during working hours to avoid</li> </ul>	<i>GCC 18.2 – sets out the safety requirements that the contractor will comply with to enclose the site and safeguard the public.</i>
<b>Fire Hazards</b>	Moderate	Low	Demolition debris including timber and drywall as well as oil-based paints, solvents and other materials	<p>The Contractor will ensure:</p> <ul style="list-style-type: none"> <li>- Adequate training of all staff onsite on fire safety and how fires</li> </ul>	GCC 18.2 covers this requirement.

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
			are flammable under certain conditions.	<p>and explosions can be avoided as well as basic fire suppression techniques.</p> <ul style="list-style-type: none"> <li>- The contractor will provide fire suppression equipment such as fire extinguisher.</li> <li>- Potentially flammable items should be kept in cool locations away from heat, sparks or any potential igniter of the material.</li> <li>- All debris, especially potentially flammable debris should be removed from the site and disposed of as per guidance from SLSWMA.</li> </ul>	
<b>Slippage and Falling, Working at Heights</b>	Low	Low – Moderate	Most of the construction work that will occur on this site will be at ground level. All structures on the site are also single-story structures. One of the onsite activities demolition and reconstruction of a water tank pad and installation of new water tanks	<p>All staff on site will receive training on reducing the risk of slippage and falls.</p> <ul style="list-style-type: none"> <li>- Personnel will be required to wear appropriate PPE at all times.</li> <li>- Scaffolding and other protective measures will be used to protect workers working at height.</li> </ul>	GCC 18.2 covers this requirement.
<b>Social Impact – Worker influx</b>	Moderate	Low	The successful contractor is likely to bring some or all of his workforce from other communities in Saint Lucia. The community of Canaries has high levels of unemployment and poverty. An influx of workers into the community compounded with the inconvenience caused by the project could lead to negative interactions	<ul style="list-style-type: none"> <li>- Contractors should seek to employ skilled workers from the Canaries community and surrounding areas as much as possible.</li> <li>- All persons recruited should be vetted by ensuring that they provide a recent police certificate of character.</li> </ul>	<i>GCC 9.4.1 covers this requirement.</i>

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
			<p>with the community.</p> <p>Additionally, if onsite staff are not properly screened before they are hired, the influx of staff could expose the community to dangerous individuals.</p> <p>An influx of workers can place additional pressure on a community including, the transportation system, water supply, sanitation system etc. This impact is expected to be minor and it is expected that the community will benefit from additional economic activity from providing meals and other amenities to the workers.</p>		
<b>Public Health and Safety</b>	Moderate	Moderate	<p>The provision of health services will continue on the compound while the works are ongoing, hence, special attention will have to be paid to keeping the staff and clients safe while on site. Impacts such as reduced air quality, noise and increased risk of falls and accidents</p> <p>Noise, dust and equipment emissions from nearby works. (iii) Vehicular and pedestrian traffic adjacent to the works</p>	<p>The Contractor will:</p> <ul style="list-style-type: none"> <li>- Apply the approved Site Management Plan</li> <li>- Follow environmental &amp; social best practices guidance for general safety and convenience of the public;</li> <li>- Train employees on Emergency procedures to be instituted in case of an incident or accident involving the staff and clients of the facility.</li> <li>- Adequate hoarding will be</li> </ul>	<p><i>GCC 18.2 – sets out the safety requirements that the contractor will comply with to enclose the site and safeguard the public.</i></p>

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
<b>Security of the public</b>			<p>The use of signage to inform the public of the ongoing works. The sign should include relevant information on the contractor, client, funding agency and the timeframe.</p> <p>The use of lights, guards, fencing etc. for protection of the works and for the safety and convenience of the public.</p>	<p>provided to ensure that the site is enclosed from the staff and clients of the centre.</p> <ul style="list-style-type: none"> <li>- Follow recommendations in this Table for noise and dust.</li> </ul> <p>The Contractor will:</p> <ul style="list-style-type: none"> <li>- procure the requisite insurances.</li> <li>- Use adequate signage to inform the public of the works and the need to be vigilant and to adhere to security measures that are in place at the site.</li> <li>- Record and report grievances to the PIU.</li> </ul>	<p><i>GCC 18.2 and 29 set out the safety requirements that the contractor will comply with.</i></p> <p><i>The bidding document and contract will reference and/or incorporate the ESHS Specifications to which the Contractor will be bound.</i></p> <p><i>The PIU will undertake the communication with the public.</i></p>
<b>Community Conflict and Grievances</b>	Low	Low	Residents may be dissatisfied if the contractor employs mainly workers from outside the community, this may result in conflict between the employees and the residents.	<p>The Contractor will:</p> <ul style="list-style-type: none"> <li>- Report any conflict between the onsite personnel and members of the public to the PIU and the relevant authorities.</li> <li>- The Contractor will assign responsibility for dealing with complaints from the general public to the site foreman or supervisor. Reports will also be accepted during consultations with stakeholders and the wider public.</li> </ul>	9.4.20 <i>Training of Contractor's Personnel.</i>

Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
			<ul style="list-style-type: none"> <li>- The Contractor shall establish a Grievance Redress Mechanism (GRM) for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details. The contractor shall take appropriate measures to ensure</li> <li>- that the site is well-secured in order to protect assets on site.</li> <li>- The Contractor should develop and maintain a CoC for all personnel, including the sub-contractors for site activities. The CoC will form part of the workers' and sub-contractor contracts. Worker training shall include sensitization on the CoC and interactions with the general public.</li> <li>- The CoC will prohibit all forms of sexual exploitation and abuse and sexual harassment (SEA/SH). <i>A template of the CoC is in Appendix B.</i></li> <li>- The GRM will have a channel for the uptake of grievances related to SEA/SH and gender-based</li> </ul>	<p>GCC 9.4.19 covers this requirement.</p> <p>GCC 26 is also applicable.</p>

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
				violence (GBV). <ul style="list-style-type: none"> <li>- Promote the GRM through ongoing community outreach and consultation</li> <li>- Ensure that there is adequate stakeholder consultation.</li> </ul>	<i>GCC 9.4.19 covers this requirement.</i>
<b>Exposure to Biological hazard</b>	Moderate	Moderate	<p>Onsite staff may encounter medical waste during renovation.</p> <p>Staff may also encounter other workers onsite who may present with infectious diseases including those of a respiratory nature.</p> <p>Although COVID-19 is no longer a public health emergency, staff may also encounter other workers onsite who may present with infectious diseases including those of a respiratory nature.</p>	<p>The Contractor will ensure:</p> <ul style="list-style-type: none"> <li>- That staff are provided with adequate PPE and training for interactions with medical waste and other hazardous materials.</li> <li>- Although COVID-19 is no longer a public health emergency, persons presenting with symptoms of respiratory illness should remain off the project site until they recover. Alternatively based on the recommendation of the worker’s healthcare provider, the worker may be allowed to work onsite while maintaining strict social distancing and wearing appropriate PPE.</li> </ul>	<i>GCC 18.2 covers this requirement, however a specification can be included requiring that the contractor provides the appropriate PPE such as hazmat suits, and masks for carrying out any task which involves hazardous wastes.</i>
<b>Security</b>	Low	Low	<p>Unauthorised persons may attempt to enter the site, placing themselves and others at risk.</p>	<ul style="list-style-type: none"> <li>- The Contractor will conduct a security risk assessment of the site and put in place measures to protect property and personnel on the site.</li> <li>- The Contractor will ensure that unauthorised persons are kept off</li> </ul>	<i>GCC 29 and 18 (a) provide guidance on keeping the site safe and protecting persons and property on the site.</i>

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
				<p>the site.</p> <ul style="list-style-type: none"> <li>- The Contractor shall submit for the Project Manager's No-objection a security management plan that sets out the security arrangements for the Site.</li> <li>- The Contractor shall (i) conduct appropriate background checks on any personnel retained to provide security; (ii) train the security personnel adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct towards Contractor's Personnel, Employer's Personnel and affected communities; and (iii) require the security personnel to act within the applicable Laws and any requirements set out in the Specification.</li> </ul>	
<b>Chance Finds</b>	Low	Low	Excavations may result in the unearthing and damage to historical or archaeological heritage.	<ul style="list-style-type: none"> <li>- The Contractor will provide training on the Chance Find Procedure to personnel</li> <li>- The Contractor shall not damage archaeological sites, protected areas and cultural heritage.</li> <li>- If items of cultural or historical significance are unearthed or discovered, works must stop</li> </ul>	GCC 19 provides guidance by listing items of historical or archaeological value that may be unearthed and presents the steps or procedures that the Contractor must follow in the event of a Chance Find.

Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC/PCC
			<p>immediately, and the Supervision team must be informed. The Contractor will also notify the National Trust Department and other relevant agencies upon encountering any artefacts, remains or other notable objects immediately.</p> <ul style="list-style-type: none"> <li>- The Contractor shall follow the Chance Find Procedures and ensure that training is provided to all project workers on the Chance Find Procedures.</li> <li>- If human remains are unearthed, work must stop immediately and the Contractor must notify the Supervising Consultant who will inform the PIU.</li> <li>- The PIU will report the finding to the Police and the site will remain closed until an investigation is conducted and the all clear is given to resume work.</li> </ul>	

## 6.2 OPERATIONS

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
<b>Operations</b>	Low	Low	<p>The smarting of the facility will result in no or little additional pressure on the maintenance and medical staff. The renovation of the Canaries Wellness Centre should also reduce the overall cost and complexity of maintenance required. For example:</p> <ol style="list-style-type: none"> <li>1) Porcelain tile flooring will be more durable</li> <li>2) Latex and eggshell paint will require less frequent repainting</li> <li>3) Improved HVAC design will lead to less mould and air quality issues, leading to less frequent closures for mould remediation</li> <li>4) The improved electrical system and the standby generator will allow for better continuity of operations</li> <li>5) Water efficiency improvements as well as the addition of water storage capacity will improve the availability of potable and running water, improving continuity of operations following interruptions to the municipal water supply.</li> </ol>	<ul style="list-style-type: none"> <li>- Training of relevant staff in commissioning, testing, and operations of any new equipment prior to the opening.</li> <li>- Establishment of a clear schedule for maintenance of the Wellness centre and the equipment and systems within it. Maintenance of systems including the standby generator, water pump, A/C Units, Fans, Fire alarm, and emergency lighting should be inspected, maintained and tested as per the manufacturer’s specifications. Generally all systems should be inspected and tested at least once per year.</li> <li>- MOHWEA should monitor the validity of installer and manufacturer’s warranties on newly installed equipment</li> <li>- MOHWEA should allocate an appropriate budget for testing, servicing and repairing the infrastructure and equipment.</li> </ul>

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## **7.0 Project Management and Institutional Arrangements**

### **7.1 ESMP Implementation**

The Ministry of Health, Wellness and Elderly Affairs will have overall responsibility for the implementation of the works. The Environmental & Social Specialist from the PIU will be supported by the design and construction management firm who will be responsible for the day-to-day monitoring of the construction and providing weekly reports.

Frequent meetings will be required to determine site changes, health, safety, social and environmental conditions, the adequacy of the mitigative measures, and the overall ability of the contractor to execute the works as specified and in a sustainable manner.

#### **MOHWEA & Project Implementation Unit (PIU) will be responsible for:**

- Managing the environmental and social risks and impacts.
- Engagement with project-affected peoples and other stakeholders, monitoring and ex-post evaluations.
- Implementation of day-to-day project activities.
- Monitoring and supervision of project activities.
- Liaising with project stakeholders.
- Publicizing the GRM.
- Grievance Redress Management.
- Systematically documenting evidence of its activities and outcomes and providing information to the World Bank team as needed.

#### **The Supervising Consultant (SC) will be responsible for:**

- Addressing potential construction and operational ESHS risks.
- Final review of ESHS aspects of designs to ensure that they form a sound and comprehensive basis for addressing potential construction and operational ESHS.
- Preparation of ESHS Specifications for inclusion in the tender document and the subsequent works contract.
- Supervision of the contractor's compliance with contractual obligations.
- Reviewing and approving the OHSM, Method Statements and MSIPs (collectively the C-ESMP), and requiring revisions and updates as needed.
- Ensuring that contractors are properly briefed in relation to the importance of ESHS matters during construction; and,
- Thereby ensuring that the requirements of this Environmental and Social Management Plan, including in relation to Health and Safety and the GRM requirements associated with the design and construction process are satisfactorily implemented.

## **Contractor's Responsibilities**

- The Contractor will be responsible for complying with the ESHS provisions of the contract, including any subcontractor(s), to the satisfaction of the Supervising Consultant and PIU. The contractor prepares the OHSM and MSIPs to meet the requirements of the Contract, and Method Statements as required by the SC, to describe how they will deliver the ESHS requirements of the Contract, in terms of the tools, equipment and methods they will use. The following is a non-exhaustive list of potential ESHS issues that the contractor must address through this process: Permits and Approvals
- Site Security
- Terms and conditions of employment
- Establishing safe systems of work
- Noise Control
- Use and Management of Hazardous Materials, fuels, solvents and petroleum products
- Use and Management of Pesticides
- Use of Preservatives and Paint Substances
- Traffic Management
- Management of Standing Water
- Management of Solid Wastes -trash and debris
- Management of Liquid Wastes
- Management of Medical Wastes
- Training of working, including induction training
- Adherence to and enforcement of the Code of Conduct by ensuring that the employees sign and follow the CoC.

## **7.2 Supervision Monitoring and Reporting**

### **7.2.1 Supervision – Construction Phase**

The contractor is responsible for ensuring that the works are carried out in accordance with the approved OHSM, MSIP and Method Statement for the works, and thereby deliver the requirements of the Contract. Day to day supervision and monitoring of compliance with requirements will be undertaken by the Supervising Consultant. The PIU's Environmental and Social Specialist will perform spot checks and periodic visits, to ensure that the Supervising Consultant is performing and holding the contractor to account for delivering to requirements.

The design supervision firm will inspect the works periodically to ensure that the contractor is in compliance with approved documents. Collaborating agencies may also carry out monitoring and investigation of matters arising from complaints by the public, in connection with implementation of any of the project components, which fall under its jurisdiction.

The design supervision firm, assisted by the Supervision Consultant is required to review, implement and supervise the ESMP including Health and Safety requirements to ensure

compliance, so as to mitigate environmental and social impacts. As part of the supervision of works the design supervision firm shall also function as the Environmental Supervisor with responsibilities for overseeing the implementation of the C-ESMP and MSIPs, in accordance with this ESMP.

### **7.2.2 Monitoring**

Environmental and social monitoring can help determine if construction works are having an impact on the environment, and on people. This can help assess the effectiveness of mitigation measures and provide early warning of pollution, and other incidents so that corrective action can be taken. Monitoring is an essential tool in relation to environmental and social management as it provides the basis for rational management decisions regarding impact control. The monitoring programme for this project will be undertaken to check on whether mitigation and benefit enhancement measures have actually been adopted and are proving effective in practice, to provide a means whereby any unforeseen impacts can be identified, and to provide a basis for formulating appropriate additional impact control measures if these appear to be necessary.

There are two basic forms of environmental and social monitoring:

1. **Compliance monitoring**- which checks whether prescribed actions have been carried out, usually by means of inspection and/or enquiries; and
2. **Effects monitoring**- which records the consequences of activities on one or more environmental or social components, and usually involves physical measurement of selected parameters or the execution of surveys, to establish the nature and extent of induced changes. As per the potential impacts and mitigation measures identified in Section 6, the environmental features/issues to be monitored will primarily consist of:
  - 1) Waste Management including
    - i. Wastewater disposal and treatment
    - ii. Solid Waste Management and disposal (including medical waste)
  - 2) Occupational Health and Safety
    - i. Compliance with safety guidelines and requirements onsite including use of protective equipment
    - ii. Compliance with site management plan, including proper hoarding where required
    - iii. compliance with traffic management plan
  - 3) Community Health
    - i. Observations of the presence of pollution (solid waste, liquid waste, noise, dust, fumes within the community as a result of construction activities)
    - ii. Observation of socio-economic impacts as a result of construction activities

Compliance monitoring is usually given more emphasis in building construction projects because

the majority of impact controls take the form of environmental and social protection measures incorporated in the design and contract documents, and the extent to which these are complied with by the contractor(s) plays a major part in determining the overall environmental and social performance of the project. Compliance monitoring affords the opportunity for a rapid response to construction impacts. There will be no effects monitoring recommended for this project.

Day-to-day environmental monitoring will be undertaken by a suitably qualified employee attached to the design supervision firm, specifically assigned as the Site Clerk. The Site Clerk, supervised by the design supervisor, will undertake the role of Environmental Compliance Monitoring Officer and undertake systematic observation of all site activities. This person may have other responsibilities, as long as s/he is able to properly meet the environmental and social monitoring requirements. An employee of the contractor will also be responsible for Environmental Compliance Monitoring.

Monitoring will, for the most part, take the form of visual observations, and site inspections will place an emphasis on early identification of any environmental problems and the initiation of suitable remedial action through communications to contractors. Where remedial actions have been required, further checks will be required to ensure that these are actually being implemented to the agreed schedule and in the required form. As information of the principal problem areas come to the fore, attention will be concentrated on activities which are known to be the most troublesome. *(See Appendix C for the Project Environmental and Social Safeguards Inspection Weekly Checklist and the Monthly Employer's Environmental and Social Safeguards Review Checklist)*

### **7.2.3 Reporting**

Bi- Weekly reports prepared by the design supervision firm will summarize the results of the daily site monitoring, remedial actions which have been initiated, and whether or not the resultant action is having the desired result. The reports will also identify any unforeseen environmental problems and will recommend suitable additional actions. Informal discussions will be held with the residents of the community to ascertain whether and how they are impacted by the ongoing works.

Monthly progress meetings should be convened with the PIU, the design supervision firm and Contractor in attendance. The Environmental Compliance Monitoring Officer /Site Clerk should also be in attendance. The fortnightly progress meetings shall include an agenda item which specifically covers environmental and social matters. Since environmental and social matters will probably, under normal circumstances, form a relatively small part of the overall business to be discussed at such meetings, it is also recommended that environmental and social matters should be the first item on the meeting agenda.

Environmental and Social issues will be specifically addressed and reported against in monthly

progress meetings and reports. The report will include a section on environmental and social monitoring, which should be circulated by the PIU to key line agencies.

The Environmental Compliance Monitoring Officer or Site Clerk will report to his/her Project Manager/Engineer on a daily basis, using conventional report forms whose coverage will be extended to include key environmental and social matters, while the Safeguards Quarterly Report will provide a summary of the broader environmental and social issues encountered during construction, (*see Appendix E for A Safeguards Quarterly Report Template which will be utilized*). The Project Engineer will decide on the appropriate course of action to be taken in cases where unsatisfactory reports are received from the Environmental Compliance Monitoring Officer / Site Clerk regarding environmental or social matters. In the case of relatively minor matters, verbal interaction with the Contractor on the need for remedial action may suffice. In all serious cases the Project Engineer/Manager has the responsibility to order a stop to any aspect of the works in the event where serious environmental damage or public nuisance/safety hazard is either imminent or has already been caused. In cases of incidents and accidents, the PIU will inform the World Bank with 24 hours and follow up action including root cause analysis shall be carried out as agreed with the Bank.

The Supervision Consultant shall be responsible for the regular monitoring of the potential impacts detailed identified on the site during the construction/renovation activities and to provide timely reports, particularly regarding issues and breaches observed to the Client. The Supervision Consultant shall ensure that such issues are addressed by the contractor expeditiously as per the conditions of his/her contract.

Table 7.2.2 below describes the process for monitoring the project's potential environmental and social impacts, by highlighting the monitoring methods which will be utilized, the parties responsible for monitoring, and the resulting actions and indicators for environmental and social management.

**Table 7.2.2 - Environmental and Social Impacts Monitoring Matrix**

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
<b>Soil, Groundwater and Surface Water Resources</b>	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&amp;S Specialist and Project Engineer of the PIU.</p>	<p>Compliance with the required contractual environmental and social standards to prevent harm to the water resources.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Completed monitoring checklists. (Available in Appendix C &amp;D)</p> <p>Reports from progress meetings</p> <p>E&amp;S Semi-Annual Report (Template in Appendix E)</p> <p>Photos</p> <p>No of reports of complaints from residents or government agencies</p>
<b>Environmental damage caused by the workforce</b>	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&amp;S Specialist and Project Engineer of the PIU.</p>	<p>Compliance with the required contractual environmental and social standards to mitigate damage to the environment.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Completed monitoring checklists. (Available in Appendix C &amp;D)</p> <p>Reports from progress meetings</p> <p>E&amp;S Semi-Annual Report (Template in Appendix E)</p> <p>Photos</p> <p>Reports of complaints from residents or government agencies.</p>

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
<b>Interruption of Healthcare Service during Renovation</b>	Discussions with Wellness Centre clients and staff of the centre  Records of client's visits	Wellness Centre Staff  E&S Specialist  PIU MoHWEA	Provision of shuttle services to alternate location(s)	Number of clients visiting the alternate centres for service.  Number of complaints reported.  E&S Semi-Annual Report (Template in Appendix E)
<b>Air Quality degradation from dust and emissions</b>	Site visits  Spot checks Agenda item at progress meetings.  One-on-one discussions with residents in proximity to the site.	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards to mitigate damage to the environment.  In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.	Completed monitoring checklists. (Available in Appendix C &D)  Reports from progress meetings  Photos E&S Semi-Annual Report (Template in Appendix E)  Reports of complaints from residents or government agencies.
<b>Noise Pollution</b>	Site visits  Spot checks  One-on-one discussions with residents in proximity to the site.	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards to mitigate damage to the environment.  In cases of non-compliance, issuing a stop order, and instructing the contractor to take utilize noise reduction measures.	Completed monitoring checklists. (Available in Appendix C &D)  Reports from progress meetings  Reports of complaints from residents.  E&S Semi-Annual Report (Template in Appendix E)
<b>Traffic Management</b>	Site visits Spot checks Agenda item at progress meetings	Contractor  Supervising Consultant,	Compliance with the approved traffic management plan.	Completed monitoring checklists. (Available in Appendix C &D)

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
		<p>The E&amp;S Specialist and Project Engineer of the PIU</p> <p>Officer in Charge of the Canaries Police Station</p>		<p>Reports of accidents</p> <p>Reports from the motoring public</p> <p>E&amp;S Semi-Annual Report (Template in Appendix E)</p>
<b>Occupational Health and Public Health and Safety</b>	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&amp;S Specialist and Project Engineer of the PIU</p> <p>Labour Department</p> <p>Environmental Health Department</p>	<p>Compliance with the required contractual environmental and social standards including the Code of Conduct, and ESS 2.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Completed monitoring checklists. (Available in Appendix C &amp;D)</p> <p>Incident and accident reports</p> <p>Reports of grievances from employees.</p> <p>Reports of grievances from general public.</p> <p>E&amp;S Semi-Annual Report (Template in Appendix E)</p>
<b>Exposure to VOCs</b>	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&amp;S Specialist and Project Engineer of the PIU</p> <p>Environmental Health Department</p>	<p>Compliance with the required contractual environmental and social standards to mitigate damage to the environment.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Incident reports</p> <p>Completed monitoring checklists. (Available in Appendix C &amp;D)</p> <p>Reports from progress meetings</p> <p>Reports from the Environmental Health Department.</p> <p>E&amp;S Semi-Annual Report (Template in Appendix E)</p>

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
<b>Exposure to biological hazards</b>	Site visits Spot checks Agenda item at progress meetings	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU  Environmental Health Department	Compliance with the required contractual environmental and social standards and the National Medical Waste Management Procedures.  In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective actions.	Incident reports  Completed monitoring checklists. (Available in Appendix C &D)  Reports from progress meetings  Reports from the Environmental Health Department  E&S Semi-Annual Report (Template in Appendix E)
<b>Hazards related to demolition</b>	Site visits Spot checks Agenda item at progress meetings	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards and the waste management plan.  In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective actions.	Incident reports  Completed monitoring checklists. (Available in Appendix C &D)  Reports from progress meetings  Complaints from the public.  Records of garbage disposed at approved sites.  E&S Semi-Annual Report (Template in Appendix E)
<b>Fire Hazards</b>	Site visits Spot checks	Contractor	Compliance with the required contractual environmental and social standards and the	Incident reports

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
	Agenda item at progress meetings	Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	National Medical Waste Management Procedures.  In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective actions.	Completed monitoring checklists. (Available in Appendix C &D)  Reports from progress meetings  E&S Semi-Annual Report (Template in Appendix E)
<b>Slippage and Falling, Working at Heights</b>	Site visits Spot checks Agenda item at progress meetings	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards.  In cases of non-compliance, issuing a stop order.	Incident reports  Completed monitoring checklists. (Available in Appendix C &D)  Reports from progress meetings  E&S Semi-Annual Report (Template in Appendix E)
<b>Security</b>	Site visits Spot checks Agenda item at progress meetings	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards.	Incident reports  Completed monitoring checklists.  Reports from progress meetings

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
<b>Chance Finds</b>	Agenda item at progress meetings	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards specifically the Chance Finds Procedures.	Reports from progress meetings  Reports of Chance Finds  E&S Semi-Annual Report (Template in Appendix E)
<b>Social Impact – Worker influx</b>	Spot checks Agenda item at progress meetings Monitoring the GM	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards specifically ESS2.	Reports of worker grievances.  Grievances from the public.  E&S Semi-Annual Report (Template in Appendix E)
<b>Community Conflict and Grievances</b>	Spot checks Agenda item at progress meetings Monitoring the GM	Contractor  Supervising Consultant,  The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards specifically the Code of Conduct.	Grievances from the public.  Reports from progress meetings  E&S Semi-Annual Report (Template in Appendix E)

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## 8.0 Stakeholder Engagement

### 8.1 Publication of ESMP

The ESMP will be disclosed on the GoSL website at <http://www.govt.lc/>. A printed copy of this ESMP will be available at the offices of the MOHWEA, the PIU and at the site office.

### 8.2 Community Engagement

Consultations were held with internal stakeholders including the MoH and the nursing staff at the facility who were given the opportunity to review the designs and provide feedback.

The works, in particular the external works, requires community engagement to inform the residents of the scope of works, the potential environmental and social impacts and mitigation measures which will be utilised to reduce the likelihood of the impacts, as well as to promote the GRM. As such a community meeting was held on February 27, 2025, where residents were provided information on the proposed project scope and given the opportunity to provide feedback on the preferred option for the continuation of services during the works. At the meeting a short survey was undertaken to solicit the views of the attendees on the selection of an option for the provision of services during the works. The survey was also distributed virtually using Google forms. Over 50 residents completed the survey with over 95% selecting identifying a relocation venue within the community as the preferred option for the provision of services.

Meetings were also held with the Parliamentary Representative (PR), where he was apprised on the scope of works, the ESMP and the GRM. The PR also recommended identifying a relocation venue as the preferred option for the provision of services during the works.

Another community meeting will be held when rehabilitation and upgrading works to the relocation venue are completed and prior to the start of works, to inform residents of the location for accessing services. The residents will also be reminded of the E&S Safeguards which will be in place for the protection of their health and safety, and of the availability of the GRM.

Using various modalities of communication including social media posts, radio and television announcements, and notices read at church and other gatherings, may help to ensure that the information being disseminated reaches a wider audience. Other virtual meetings can be held with project stakeholders and key community leaders to disseminate project information in a timely manner when and if required. These engagements will be conducted in collaboration with the PIU. Table 8.2 below provides a guide on the method and frequency of engagement for various stakeholders.

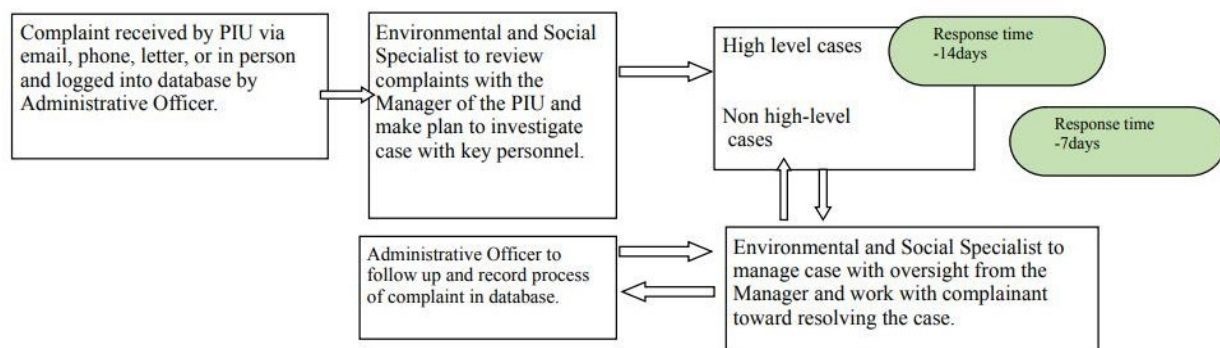
Table 8.2 - Stakeholder Engagement Schedule

STAKEHOLDER CATEGORY	PROJECT MILESTONES	METHOD OF CONSULTATION	FREQUENCY AND RESPONSIBLE PARTIES
<b>Internal:</b>			
<b>MoHWEA Permanent Secretary</b>	Signing of contract	Formal Correspondence / Signing ceremony	At least one week before signing  PIU
	Closure of Centre for commencement of physical implementation	Correspondence  Meeting	At least one month before closure  PIU
	Physical Implementation	Progress Meetings Site Visits	Monthly Supervising Consultants Contractor  PIU
	Reopening of SMART Centre	Correspondence	TBD
<b>Wellness Centre Staff Nurse Community Health Aides Doctor Pharmacist</b>	Closure of Centre for commencement of physical implementation	Formal Correspondence Meetings	At least one month before closure  PIU
	Physical Implementation	Progress Meeting	Monthly Supervising Consultants Contractor  PIU

	Reopening of SMART Centre	Correspondence	TBD
	Reopening of SMART Centre	Correspondence	TBD
<b><u>External:</u></b>			
<b>Parliamentary Representative</b>	Contract signing	Correspondence	TBD PIU
	Closure of Centre	Correspondence	At least two weeks before closure PIU
<b><u>Other Interested Parties</u></b>	Canaries Police Station Canaries Constituency Council	Correspondence Meetings and regular updates Correspondence Meetings and regular updates	PIU Contractor PIU Contractor
<b>Canaries Residents</b>	Start of physical implementation and Closure of Centre	Announcements on radio, television and town crier Church Announcements Community Meeting Posters at the Centre prior to closure Social media including Facebook and WhatsApp The Government of St. Lucia Website Press releases to Television and radio stations and newspapers including online news papers Text blasts Project Signboard	At least two to three weeks before closure PIU Contractor Supervising Consultant
	Reopening of Centre	Announcements	TBD

## 9.0 Grievance and Redress Mechanism

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to the project-level GRM that is established and managed by the project. Generally, a response will be provided to the complainant within 5 business days of receipt of the complaint for low-level complaints whereas more complex or higher-level complaints will be addressed within 14 days. The figure below shows illustrates the grievance redress process.



All grievances and how they are addressed will be logged into a database managed by the project implementation unit. Complaints addressed to the Supervision firm by members of the public, whether verbally or in writing should be transmitted to the PIU within 1 business day.

### Grievance Redress Procedures

The table below presents the steps to be followed should a grievance arise:

<p>Grievances from affected parties</p>	<ul style="list-style-type: none"> <li>• Grievances made verbally to the E&amp;S Specialist (ESS) in person at stakeholder engagement meetings or to the Contractor’s personnel.</li> <li>• By email to the following address- <a href="mailto:mohgrievances@govt.lc">mohgrievances@govt.lc</a></li> <li>• By Letter addressed to: The Permanent Secretary Grievance Redress Mechanism (GRM) <b><u>Attention to E&amp;S Specialist HSSP &amp; OECS Regional Health Projects</u></b> Department of Health and Wellness 2<sup>nd</sup> Floor, Sir Stanislaus Building, Waterfront, Castries</li> <li>• By letter, addressed to the:</li> </ul>
	<p>The Project Coordinator Project Implementation Unit OECS Regional Health Project Sure Line Building Vide Boutielle Highway Castries Saint Lucia</p> <ul style="list-style-type: none"> <li>• By phone, at number <a href="tel:758-468-8830">758-468-8830</a></li> <li>• Or call, text or WhatsApp to 286 7815</li> <li>• All GBV complaints will be handled directly by the ESS.</li> </ul>
<p>Uptake of Grievances</p>	<ul style="list-style-type: none"> <li>• The PIU serves as the access point for grievances</li> </ul>
<p>Grievance Log</p>	<ul style="list-style-type: none"> <li>• Grievances received verbally are documented, verified and signed by both parties.</li> <li>• Grievances will be copied to the relevant authority</li> </ul>
<p>Assessment</p>	<ul style="list-style-type: none"> <li>• Grievances categorized by type.</li> <li>• Determination of eligibility of grievance.</li> <li>• The first assessment of the grievance is conducted by the PIU and technical officers from the pertinent Government authorities.</li> <li>• Letters acknowledging the grievance is issued by the PIU</li> <li>• The Social Transformation Officer (STO) for the region provides assistance with dealing with conflict resolution and grievance.</li> <li>• The ESS will communicate all disputes and grievances to the PIU immediately when received. Should a dispute arise, the applicable Laws of Saint Lucia will prevail.</li> </ul>

Resolution and Follow-up	<ul style="list-style-type: none"> <li>• Development of an Implementation Plan for resolution of grievances, including timeframes in which each step is completed as stated above in the section on processing grievances.</li> <li>• The signing of the Grievance Resolution Form.</li> </ul>
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### **Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)**

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person’s rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

The project’s E&S Specialist will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The GM should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor. A list of service providers is included in Table 9 below.

To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works”. This GM will follow the official WB definitions described on the Technical Note as shown below:

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH) Sexual Harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider

An organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Survivor-centered approach

The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach

helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

The E&S Specialist and PIU will receive sensitization training on the survivor-centred approach.

SEA/SH grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach. Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the GM, as appropriate and keeping the survivor information confidential. Specifically, following steps will be taken once an incident occurs:

#### **ACTION 1: COMPLAINT INTAKE AND REFERRAL**

If the survivor gives consent, the E&S specialist fills in a complaints form excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the PIU E&S Specialist refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures. The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The PIU safeguards specialist will keep the survivor informed about any actions taken by the perpetrator employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the PIU Safeguards Specialist can close the case.

#### **ACTION 2: INCIDENT REPORTING**

The PIU E&S Specialist needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Project Manager who will in turn inform the World Bank Task Team Leader (TTL) or directly to the

TTL.

Complaint Forms and other detailed information should be filed in a safe location by the PIU Safeguards Specialist. Neither the PIU E&S specialist nor the Project Manager should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the PIU E&S Specialist needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to PIU and WB; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved or disciplinary action taken.

As long as the SEA/SH remains open the PIU Safeguards Specialist and/or Project Manager should update the World Bank TTL on the measures taken to close the incident.

### **ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION**

Each SEA/SH incident should be verified to determine if it was related to the WB financed project. The PIU E&S specialist should form a SEA/SH verification committee comprised by her/him, one member of the PIU, one member of a local service provider and a representative of the contractor (if relevant). The PIU E&S Specialist should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to the project, the verification committee discusses appropriate actions to be recommended to the appropriate party i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in the St. Lucian legal system, the PIU Safeguards Specialist should provide

linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU E&S Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GM will primarily serve to:

- Refer complainants to the SEA/SH Services Provider; and
- Record the resolution of the complaint

The GM will also immediately notify both the Implementing Agency and the World Bank of any SEA/SH complaints WITH THE CONSENT OF THE SURVIVOR.

### **Grievance Redress Mechanism (GRM) for Labour**

As part of the Labour Management Procedure (LMP), grievances that relate to project workers will be handled by a separate GRM from that of other project-related grievances. The GRM will provide all direct workers and contracted workers (and, where relevant, their organizations) with channels to raise workplace concerns. Such workers, including community workers, will be informed of the grievance redress mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance redress mechanism easily accessible to all such project workers. Community workers can access the GM via local NGOs, project officers, or the Environmental and Social Safeguards Team.

The GRM in the LMP also makes clear procedures for the handling of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) grievances. Complaints can be made in person, in writing, verbally over the phone, by fax, email or any other media. Concerns can be raised anonymously and/or to a person other than an immediate supervisor.

The Project Coordinator (PC) and the Environmental and Social Specialist assigned to the project will be designated as the key officers in charge of labour grievances resolution.

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The Project Coordinator (PC) and the Environmental and Social Specialist assigned to the project will be designated as the key officers in charge of labour grievances resolution.

**Table 9.0 - St. Lucia GBV Service Providers**

<b>Service Providers</b>	<b>Service Provided</b>	<b>Address</b>	<b>Telephone</b>	<b>Other</b>
Attorney General	Case Management	2 <sup>nd</sup> Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	<a href="mailto:slucps@gmail.com">slucps@gmail.com</a>
Family Court	Case Management	Peynier Street, Castries	468-3308	<a href="mailto:familycourt.slu@gmail.com">familycourt.slu@gmail.com</a>
Criminal Investigations Department	Case Management	Castries  Vieux Fort	456-3770 456-3817  456-3926	
Vulnerable Persons Unit	Case Management Investigates sexual offences against minors, women and men.	Vulnerable Persons Team South North	456-3908  456-4050 4051 4052	
St. Lucia Against Human Trafficking	Provides human trafficking victims and survivors with access to critical support and services to get help and stay safe.	Ministry of Home Affairs, Justice and National Security 1 <sup>st</sup> Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	<a href="mailto:police@antitraffickingslu.org">police@antitraffickingslu.org</a>
Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	<a href="mailto:gender.relations@govt.lc">gender.relations@govt.lc</a>
Abuse Hotline	Psychosocial Support		202	
St. Lucia Crisis Centre	Psychological Support Livelihood Support Assistance with basic needs such as food and shelter	107 Chausse Road, Castries	453-1521 712-7574	<a href="mailto:stluciacrisis@gmail.com">stluciacrisis@gmail.com</a>
Women's Support Centre	Legal Aid Psychological Support		458-4470	<a href="mailto:WSCCENTER2001@GMAIL.COM">WSCCENTER2001@GMAIL.COM</a>

<b>Service Providers</b>	<b>Service Provided</b>	<b>Address</b>	<b>Telephone</b>	<b>Other</b>
	Livelihood Support Assistance with basic needs such as food and shelter			
Raise your Voice St. Lucia Inc	Psychological Support Livelihood Support	Manoel Street, Castries	726-0473 487-2329	<a href="mailto:raiseyourvoiceslu@gmail.com">raiseyourvoiceslu@gmail.com</a> <a href="https://ryvslu.org/">https://ryvslu.org/</a>
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	<a href="mailto:info@prosaf.org">info@prosaf.org</a> <a href="https://prosaf.org">https://prosaf.org</a>
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	<a href="mailto:unitedandstrongstlucia@yahoo.com">unitedandstrongstlucia@yahoo.com</a> <a href="https://www.facebook.com/Unitedandstrongstlucia/">www.facebook.com/Unitedandstrongstlucia/</a>
St. Lucia Planned Parenthood Association	Sex education counselling, Sexual and reproductive health services	52 John Compton Highway	452-4335 Hotline: 459-7933 Whatsapp 722-1234	<a href="mailto:slppa758@gmail.com">slppa758@gmail.com</a>
OKEU Hospital	Medical Health Services	Castries	458-6500	
St. Jude Hospital	Medical Health Services	Vieux Fort	454- 6041	
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
Grace Wellness Centre	Medical Health Services	Grace, Vieux Fort	468-7751	
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	

### **Promoting GRM Awareness**

The Grievance Redress Mechanism (GRM) will be promoted through a public sensitization campaign which will include stakeholder engagement meetings and communication with stakeholders via email, WhatsApp and bulletins or flyers. The general public will be informed through public announcements through various media including the Government Information Service and website, television and radio announcements. All communication will provide contact information for the E&S Specialist, who is responsible for receiving complaints. The project signs will also provide relevant information about the implementing agency for persons who wish register grievances.

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## **10.0 ESMP Implementation Costs**

The costs during the construction phase for complying with the ESHS requirements will be included as a subsidiary obligation of the main work activity, and not separated in the BOQ.

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## **11.0 Conclusion**

The Canaries Wellness Centre Rehabilitation is a Category B project, not requiring a full ESIA but requires an ESMP and proper Environmental and Social Monitoring and the implementation of mitigation measures. Since the wellness centre is in the village and not on the outskirts, it will be important to ensure that the effects of construction are mitigated on the wider community. Coordination and communication with the community will be important to the successful completion of the project without incident, as well as coordination with other authorities and institutions including but not limited to RSLPF, Fire Service and Community Based organisations in Canaries and environs.

**12. 0 APPENDICES**

**Appendix A– Incident / Accident Reporting Form**

**B1: Incident / Accident Details**

<b>Project Site:</b>			
<b>Date of Incident / Accident:</b>	<b>Time:</b>	<b>Date Reported:</b>	<b>Time Reported:</b>
<b>Reported by:</b>	<b>Reported to:</b>	<b>Notification Type:</b>	<b>Email/phone call/media notice/other</b>
<b>Full Name of Contractor:</b>		<b>Full Name of Subcontractor:</b>	

**B2: Type of incident / Accident (please check all that apply)**

Fatality  Lost Time Injury  Displacement Without Due Process  Acts of Violence/Protest  Disease Outbreaks  Forced Labor  Unexpected Impacts on heritage resources  Unexpected impacts on biodiversity resources   
 Environmental pollution incident  structure failure  Other

**B3: Description/Narrative of Incident / Accident**

*I. Details of the Incident / Accident*

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*II. What were the conditions or circumstances under which the incident occurred (if known)?*

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*III. Are the basic facts of the incident clear, or are there conflicting versions? What are those versions?*

---

*IV. Is the incident still ongoing, or is it contained?*

---

*V. Have any relevant authorities been informed? Who was informed?*

B4: Actions taken to contain the incident / Accident			
Short Description of Action	Responsible Party	Expected Date	Status
Have the works been suspended?                      Yes <input type="checkbox"/> ;                      No <input type="checkbox"/> ;			

Please attach a copy of the instruction suspending the works.

B5: What support has been provided to affected people

<b>B6: Injury Information</b>	
<b>Injured Employee</b>	
<b>Name:</b>	<b>Job Title:</b>
<b>Job at time of Injury:</b>	
<b>Type of Employment</b> Full – time <input type="checkbox"/> Part – time <input type="checkbox"/> Temporary <input type="checkbox"/> Other <input type="checkbox"/>	
<b>Length of time employed with the Company:</b>	
<b>Length of time in current position at the time of the incident:</b>	
<b>Description and severity of injury:</b>	
<b>Location at the time of the incident/accident</b>	
<b>Date and time of incident / Accident:</b>	

## Appendix B - Code of Conduct for Contractor's Personnel (ES) Form

This document is also included as part of the Request for Bids Small Works Standard Procurement Document.

**Note to the Employer:**

*The following minimum requirements shall not be modified. The Employer may add additional requirements to address identified issues, informed by relevant environmental and social assessment.*

*The types of issues identified could include risks associated with: labor influx, spread of communicable diseases, and Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) etc.*

**Delete this Box prior to issuance of the bidding documents.**

**Note to the Bidder:**

**The minimum content of the Code of Conduct form as set out by the Employer shall not be substantially modified.** However, the Bidder may add requirements as appropriate, including to take into account Contract-specific issues/risks.

The Bidder shall initial and submit the Code of Conduct form as part of its bid.

### CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [enter name of Contractor]. We have signed a contract with [enter name of Employer] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “**Contractor's Personnel**” and are subject to this Code of Conduct.

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

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

## REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out their duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
  - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
  - b. wearing required personal protective equipment;
  - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
  - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to their life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

**RAISING CONCERNS**

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Contractor’s Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [ ] or by telephone at [ ] or in person at [ ]; or
2. Call [ ] to reach the Contractor’s hotline (*if any*) and leave a message.

The person’s identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

**CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT**

Any violation of this Code of Conduct by Contractor’s Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

**FOR CONTRACTOR’S PERSONNEL:**

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor’s contact person with relevant experience*] requesting an explanation.

Name of Contractor’s Personnel: [insert name]

Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_

Countersignature of authorized representative of the Contractor:

Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_

**ATTACHMENT 1: Behaviors constituting Sexual Exploitation and Abuse (SEA) and behaviors constituting Sexual Harassment (SH)**

ATTACHMENT 1 TO THE CODE OF CONDUCT FORM

**BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND  
BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)**

The following non-exhaustive list is intended to illustrate types of prohibited behaviors:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A Contractor's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.
- A Contractor's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Contractor's Personnel rapes, or otherwise sexually assaults a member of the community.
- A Contractor's Personnel denies a person access to the Site unless he/she performs a sexual favor.
- A Contractor's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) **Examples of sexual harassment in a work context**

- Contractor's Personnel comment on the appearance of another Contractor's Personnel (either positive or negative) and sexual desirability.
- When a Contractor's Personnel complains about comments made by another Contractor's Personnel on their appearance, the other Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Contractor's or Employer's Personnel by another Contractor's Personnel.
- A Contractor's Personnel tells another Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

## Appendix C -Project Environmental and Social Safeguards Inspection Weekly Checklist

(This weekly checklist when filed in the Project Environmental and Social Safeguards File constitutes a Register of Environmental and Social Safeguards Effects).

This form is to be completed by the Contractor's Nominated person(s) **weekly** from the start of major construction work on site. Completed forms are to be kept readily available in the Project Environmental and Social Safeguards File for the duration of construction works during which time they can be inspected by the Supervising Officer or representatives of the Government of St. Lucia.

Sub-Project Contract: \_\_\_\_\_

Construction Phase: \_\_\_\_\_

Contractor: \_\_\_\_\_

Recording Officer: \_\_\_\_\_

Designation of Recording Officer: \_\_\_\_\_

Date: \_\_\_\_\_

Any environmental actions identified are to be brought to the urgent attention of the appropriate personnel as soon as possible. A copy of this completed form is to be issued to the Supervising Engineer within two days of the date of inspection.

Environmental Issue to be considered in site inspection	YES	NO	N/A	If <b>YES</b> add an explanatory comment and mitigation measure
<p><b>Issue: Loss of soil through soil erosion</b></p> <ul style="list-style-type: none"> <li>- Has any natural vegetation outside the working width of the construction work area been removed?</li> <li>- Are there any visible signs of soil erosion?</li> <li>- Are excavated areas properly maintained to prevent soil erosion?</li> <li>- If any sediment traps have been installed, have they become clogged and not functional?</li> <li>- Are any soil retention/slope stabilisation measures required or being implemented?</li> </ul>				
<p><b>Issue: Soil Contamination</b></p> <ul style="list-style-type: none"> <li>- Are there any signs of soil that has been contaminated due to spillage (Petrochemical, cleaning products)?</li> </ul>				
<p><b>Issue: Pollution of water courses/bodies/source through soil erosion, entry of liquid construction waste or chemicals or entry of solid construction waste into the water course/body</b></p>				

Environmental Issue to be considered in site inspection	YES	NO	N/A	If <u>YES</u> add an explanatory comment and mitigation measure
<ul style="list-style-type: none"> <li>- Are there visible signs of increased sediment immediately downstream of construction works in any rivers, in the well or in the nearby marine environment within the project area?</li> <li>- Have there been any complaints from residents or third parties regarding pollution of water sources/courses/bodies?</li> <li>- Has any construction spoil been disposed of into or adjacent to a water source/course/body?</li> <li>- Are any construction related fuels and chemicals stored within 10m of a water source/course/body?</li> <li>- Has any fuel or chemical leaked during storage, transport to site, use on site or refuelling?</li> <li>- Has any construction related solid or liquid waste entered a water source/course/body within the general project area (including construction site office)?</li> </ul> <p><b>Issue: Prevention of negative landscape and visual impacts.</b></p> <ul style="list-style-type: none"> <li>- Have any construction compounds, materials dumps, or waste disposal sites in use not been discussed and agreed with the Supervising Officer (and, if necessary, appropriately licensed with the Government of St Vincent?)?</li> <li>- Are there any visible signs of scaring from excavation works that require restoration?</li> </ul>				
<p><b>Issue: Management and disposal of solid and liquid construction wastes.</b></p> <ul style="list-style-type: none"> <li>- Has any construction related packaging (especially cement bags) been disposed of on the side of the road, in vacant land, along river embankments or in the river channel, or at any unofficial waste disposal site along the route?</li> <li>- Has any contaminated/hazardous material been found during construction?</li> <li>- Is any sub-contractor's waste being disposed of along the roadside or at an unlicensed waste disposal site along the route?</li> <li>-</li> <li>- Has any construction waste of any kind been dumped by the side of the road or along the river embankment?</li> </ul>				

<b>Environmental Issue to be considered in site inspection</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>If <u>YES</u> add an explanatory comment and mitigation measure</b>
<ul style="list-style-type: none"> <li>- Are any liquid wastes being discharged to water courses?</li> <li>- Has any liquid waste, liquid contaminant leaked unto the site, into any neighbouring lands or water source/course/body?</li> <li>- Is water discharge/pumping in progress?</li> <li>- Is there any Hazardous waste by products on site?</li> </ul>				
<p><b><i>Issue: Management of construction noise and vibration.</i></b></p> <ul style="list-style-type: none"> <li>- Is any noisy stationary plant being operated adjacent to housing? (If so are they screened to reduce disturbance?)</li> <li>- Are any noisy activities taking place before 7:00 a.m. or after 5:00 p.m. between Monday to Friday? (If so has this working been discussed and agreed with the Supervising Engineer/Client?)</li> <li>- Have there been any noise or vibration related complaints during the last week?</li> </ul>				
<p><b><i>Issue: Dust nuisance prevention.</i></b></p> <ul style="list-style-type: none"> <li>- Are there any houses adjacent to the construction sites being affected adversely by dust?</li> <li>- Are any crops adjacent to the construction works covered with dust?</li> <li>- Is there any quarry material stored on site that is uncovered or does not have hoarding and subject to dispersal by the wind?</li> <li>- Are any trucks, carrying quarry materials to or from the site, transporting this material uncovered?</li> <li>- Is adequate water available to damp down any dusty operations ongoing on site?</li> <li>- Have there been any dust related complaints during the last week?</li> </ul>				
<p><b><i>Issue: Air Pollution (Fumes)</i></b></p> <ul style="list-style-type: none"> <li>- Are there any signs of high levels of exhaust/ fumes/ malodors?</li> <li>- Have there been any fumes nuisance related complaints during the last week?</li> </ul>				
<p><b><i>Issue: Dealing with archaeological finds.</i></b></p> <ul style="list-style-type: none"> <li>- Have any potential historic artefacts been found during construction? (If so, note how these have been dealt with).</li> </ul>				
<p><b><i>Issue: Construction traffic management.</i></b></p>				

Environmental Issue to be considered in site inspection	YES	NO	N/A	If <u>YES</u> add an explanatory comment and mitigation measure
<ul style="list-style-type: none"> <li>- Is there adequate signage to inform motorists of the construction activities ahead?</li> <li>- Have there been any complaints about construction traffic impacts (noise, dust, congestion)?</li> <li>- Is there a designated turning/ loading/ offloading area? (If so, is there adequate signage or are a traffic management system being implemented?)</li> <li>- Have there been any traffic accidents/incidents during the last week due to the construction activity on this site? (If so, state how many and severity)</li> </ul>				
<p><b>Issue: Dealing with hazardous substances.</b></p> <ul style="list-style-type: none"> <li>- Have any: old drums or containers, oily sheen, materials with a strong smell or unusual colouration been exposed/damaged during construction excavations?</li> <li>- Are drums containing hazardous material properly stored and adequately labelled on the site?</li> <li>- Has there been any spillage during the last week? (If so, how many, what was spilled, how much and how was it managed?)</li> </ul>				
<p><b>Issue: Environmental Incidents and Corrective Actions.</b></p> <ul style="list-style-type: none"> <li>- Have complaints been received from the public or other third party during the last week? (If so, how many? Attach a copy of the reports)</li> <li>- Has any incident leading to a threat of human health or life occurred during the last week? (If so, how many? Describe severity and attach copy of incident report)</li> </ul>				

**Completed by:**

**Designation: Contractor's Representative**

**Signed .....**

**Print Name: .....**

**Date: .....**

**Designation: Client's Supervising Officer**

**Action completed:**

**Signed** .....

**Print Name:** .....

**Date:** .....

**ENVIRONMENTAL INSPECTION AND SOCIAL SAFEGUARDS REGISTER – ADDITIONAL COMMENTS**

*If required, provide supporting comments relating to the specified environmental checks or on any site environmental or social safeguards matter worthy of note*

**Continuation Sheet No. Pages:** |

## APPENDIX D- Monthly Employer’s Environmental and Social Safeguards Review Checklist

Month in Review: \_\_\_\_\_

This form is to be completed by the Employer’s Nominated person(s) **monthly**. Completed forms are to be kept on file in the Project Co-ordination Unit offices. A copy should be passed to the Supervising Officer for information within 48 hours.

Subproject: \_\_\_\_\_

Contractor: \_\_\_\_\_

Recording Officer: \_\_\_\_\_

Recording Officer Designation: \_\_\_\_\_

Date: \_\_\_\_\_

The purpose of this review is to check monthly that the Project Environmental and Social Safeguards File is being kept up to date.

Issue to be considered in the review	Yes	No	Comments and detail of any corrective actions requested
Q - Looking at the file is there evidence that the Contractor is undertaking the weekly Environmental Inspections and filing the completed Inspection Checklist?			
Q – Looking at the file and the completed weekly Environmental Inspection, has the Supervising Engineer signed the completed checklists?			
Q – Looking at the file is there evidence that the Contractor is maintaining the log of environmental incidents/complaints? ( <u>It is possible that there may be very few or no complaints of this project so this form may in reality not be used. If there are no complaints at the time of review write this in the comments box.</u> )			
Q – Looking at the file is there evidence that any Corrective Action Requests (CAR) which have been issued have been signed off as completed by the originator of that CAR?			

<b>Q</b> – Looking at the file is there evidence that any Social Safeguards or Grievances have been recorded?			
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<p><b>MONTHLY EMPLOYER’S ENVIRONMENTAL AND SOCIAL SAFEGUARDS REGISTER REVIEW – ADDITIONAL COMMENTS</b></p> <p><i>If required, provide supporting comments relating to specific points above.</i></p>	
<b>Continuation Sheet No. Pages:</b>	

*Review completed by:*

Designation: Employer’s Representative

Signed .....

Print Name: .....

Date: .....

Designation: Contractor’s Representative

Signed .....

Print Name: .....

Date: .....

## **Appendix E: E & S Quarterly Report Template**

Environmental and Social Quarterly Report  
[Date ]

- A. Summary
- B. Context
- C. Sub-projects and Program Activities
- D. Environmental Management Actions Items
- E. Status of the Grievance Redress Mechanism
- F. Conclusions and Recommendations

# Appendix F- SEA, SH AND GBV Grievance redress process, grievance redress registration and closure forms

Complaint Number: [Number]

Complaints Form Template

**CONFIDENTIAL Complaints Form**  
**DO NOT FILL IN IF SEA/SH SURVIVOR**  
**DOES NOT CONSENT**  
**OECS Regional Health Project and Saint**  
**Lucia Health System Strengthening**  
**Project**

Please complete this form to report a problem or file a complaint with the OECS Regional Health Project and Saint Lucia Health System Strengthening Project. After you fill the form, tear off and keep the receipt at the bottom and put the form in the complaints box.

*Program*

1. What program are you complaining about? Please tick the correct box.

OECS Regional Health Project (explain project activities briefly)

Saint Lucia Health System Strengthening Project (explain project activities briefly)

Other

---

*Details of Complaint*

2. Today's date: Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_

3. Parish: \_\_\_\_\_

4. Sex of person complaining (M/F): \_\_\_\_\_ 5. Age of person complaining: \_\_\_\_\_

Please tell us about your complaint so the program can investigate. Please include as much information as possible.

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*Personal Details (Optional)* PLEASE NOTE THAT YOU HAVE THE RIGHT TO REMAIN ANONYMOUS AND NOT PROVIDE PERSONAL DETAILS.

If you would like to receive a response from the program about your complaint, please fill in your details below. If you do not fill in these details, you will remain unknown and the program will not be able to contact you.

6. First Name: \_\_\_\_\_ 7. Last Name: \_\_\_\_\_

**DO NOT FILL IN IN THE CASE OF SEA/SH GRIEVANCES**

8. Parish: \_\_\_\_\_ 9. Mobile number: \_\_\_\_\_

10. Mediator for affected person: \_\_\_\_\_

11. Civil organization / Service Organization: \_\_\_\_\_



Receipt:

Complaint Number: [Same number as above]

Date received: \_\_\_\_\_

Person receiving the complaint: \_\_\_\_\_

**DO NOT FILL IN IN THE CASE OF SEA/SH GRIEVANCES**

Page Number: **[Number]**

<b>O ECS Regional Health Project</b> <b>Saint Lucia Health System Strengthening Project</b>										
IDENTIFICATION OF PERSON / ENTITY				NATURE OF THE REQUEST / COMPLAINT			REQUEST/ COMPLAINT PROCESSING			
Log #	Name (and age) of the complainant	Contact Details	Incident date	Information request / complaint	Received by	Response provided / action taken	Date of request / incident response	Action Taken (under review, investigation, closed)	Date Closed	

**FILL IN ONLY FOR SEA/SH INCIDENTS**

<b>O ECS Regional Health Project</b> <b>Saint Lucia Health System Strengthening Project</b>			
Nature of the allegation (what the complainant says in her/his own words without direct questioning)	Was the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)	Survivor's age and/or sex (if disclosed)	Was the survivor referred to services?

Meeting Record Format

Subproject: ..... Community: ..... Location: .....

Date of the Meeting:.....Complaint Register No:

..... Venue of meeting: .....

Details of Participants:

Complainant	Project/Government

Summary of Grievance: .....

.....

.....

Notes on Discussion: .....

.....

.....

.....

Decisions taken / Recommendations: .....

.....

.....

.....

Issue Solved / Unsolved \_\_\_\_\_Signature of Chairperson of the meeting:

Name of Chairperson: ..... Signature :.....

Date: ..... (DD/MM/YYYY)

**Grievance Closure Form**

Subproject: ..... Community:..... Location: .....

**Result of Grievance Redressal**

1. Registration No.:
2. Name of Complainant:
3. Date of Complaint:
4. Summary of the Complaint:
5. Summary of Resolution:
6. Date of Redressal of the Grievance: (dd- mm – yyyy)

Signature of the Complainant in acceptance of the Solution to his /her Grievance

Name:.....

National ID number: .....

Signature of Permanent Secretary or Project Manager: .....

Name: .....

Place: .....

Date:(dd –mm – yyyy): .....

**Appendix G- Site Photos**













