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ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR THE RENOVATION OF THE GRAND RIVIERE WELLNESS CENTRE

For the Preparation of Design, Bidding Documents, Supervision
and BOQs for the Grande Riviere Wellness Centre

Executed By:



The Government of St. Lucia
Ministry of Health, Wellness and

Financed By:



THE WORLD BANK
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International Bank for Reconstruction &
Development

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ACRONYMS AND ABBREVIATIONS

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

1 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.

2. PROJECT DESCRIPTION

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

2.1 PROJECT SCOPE AND CONTEXT

Grande Riviere is a residential community in the quarter of Gros Islet. Grand Riviere has an estimated population of 740 persons. This Wellness Centre also serves neighbouring communities including Corinth, Monier, Piat and White Rock. The Wellness Centre therefore serves almost 3000 residents.

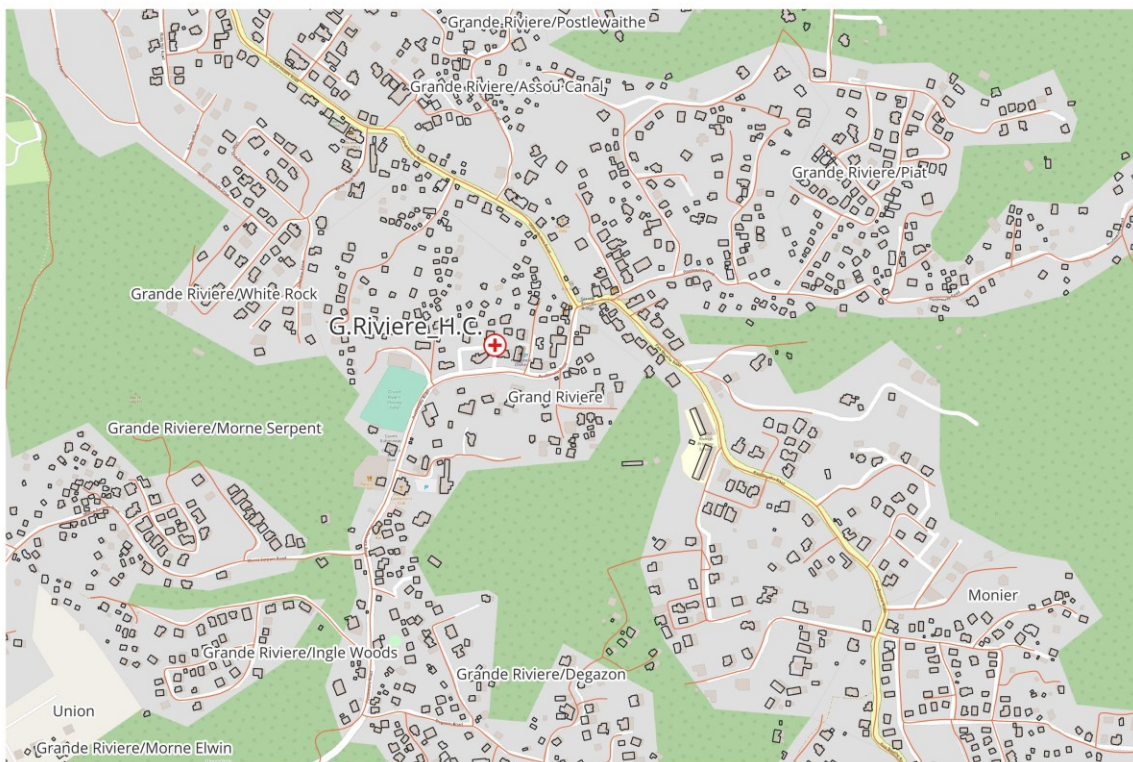


Figure 1 Location of Grande Riviere Wellness Centre

The Grand Riviere Wellness Centre is the only healthcare facility in the community. However, the Gros Islet Polyclinic is located about 8km away.

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.

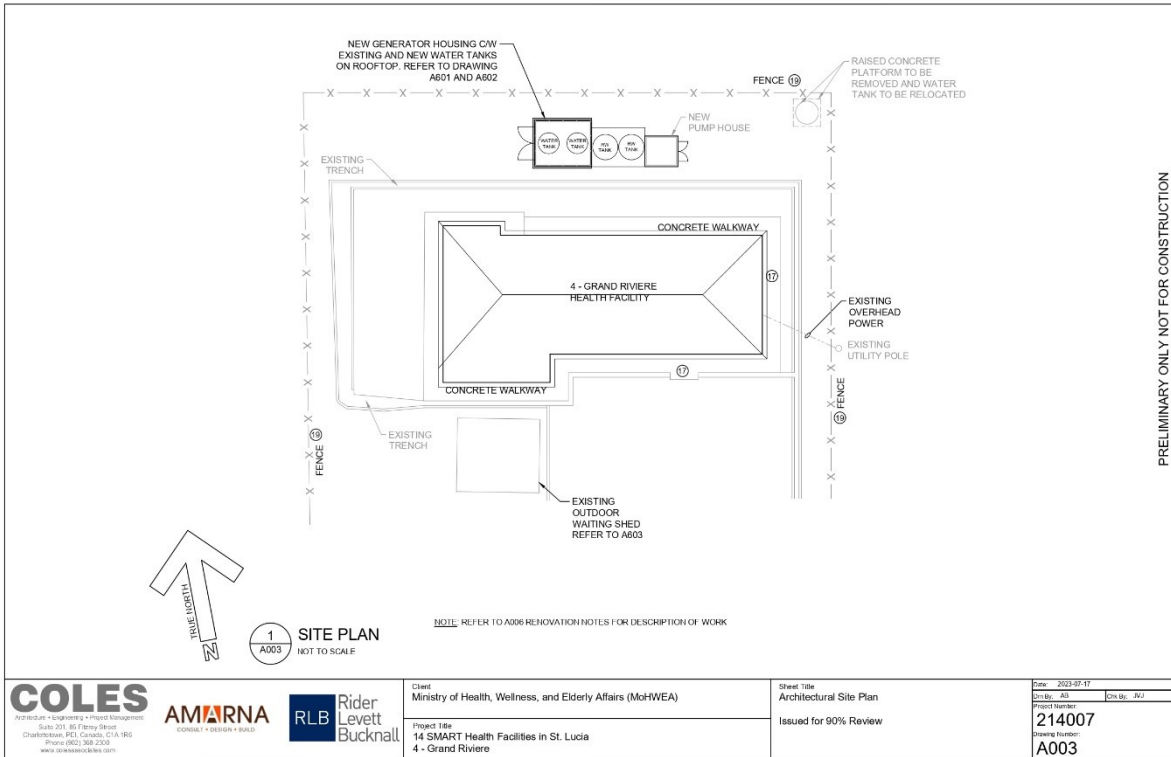
2.2 PROJECT DETAILS

The rehabilitation of the Grand Riviere Wellness Centre includes:

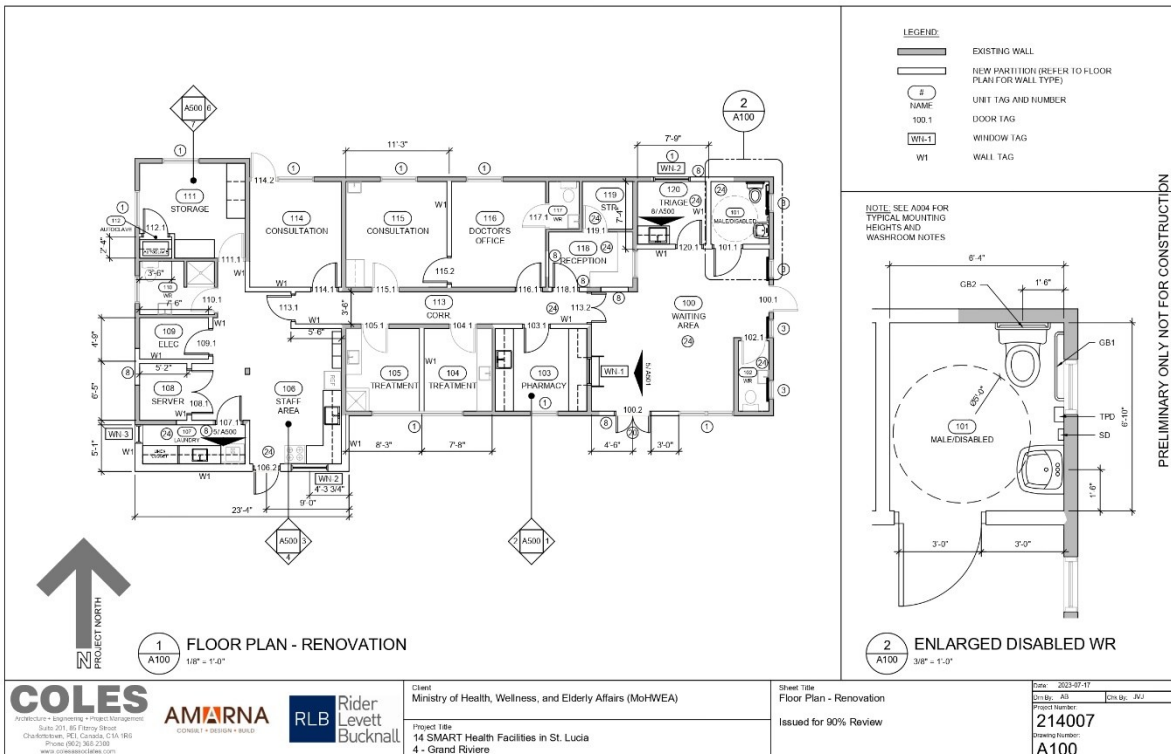
- 1) Repair and repaint of roof fascia boards
- 2) Repaint and repair all walls
- 3) Refurbishment of an existing waiting shed
- 4) Construction of new ramp with handrails
- 5) Installation of a new solar water heater system on the roof of the facility
- 6) Installation of new signage to include room name and number
- 7) Repair of fencing
- 8) Construction of new housing for the standby generator with water tanks installed on roof
- 9) Installation of new interior and exterior doors and windows and installation of shatterproof film on all exterior windows
- 10) Rewiring of the electrical and telecommunication systems in the building, including the installation of energy-efficient luminaires, fire alarm, emergency signage, and data outlets
- 11) Reconfiguration of internal partitions to improve functionality including the demolition of existing partitions and installation of new partitions, creating dedicated electrical and server rooms and a washroom for persons with disabilities
- 12) Improvements to HVAC including the installation of new split AC units, ceiling fans and wall fans
- 13) Replacement of bathroom fixtures



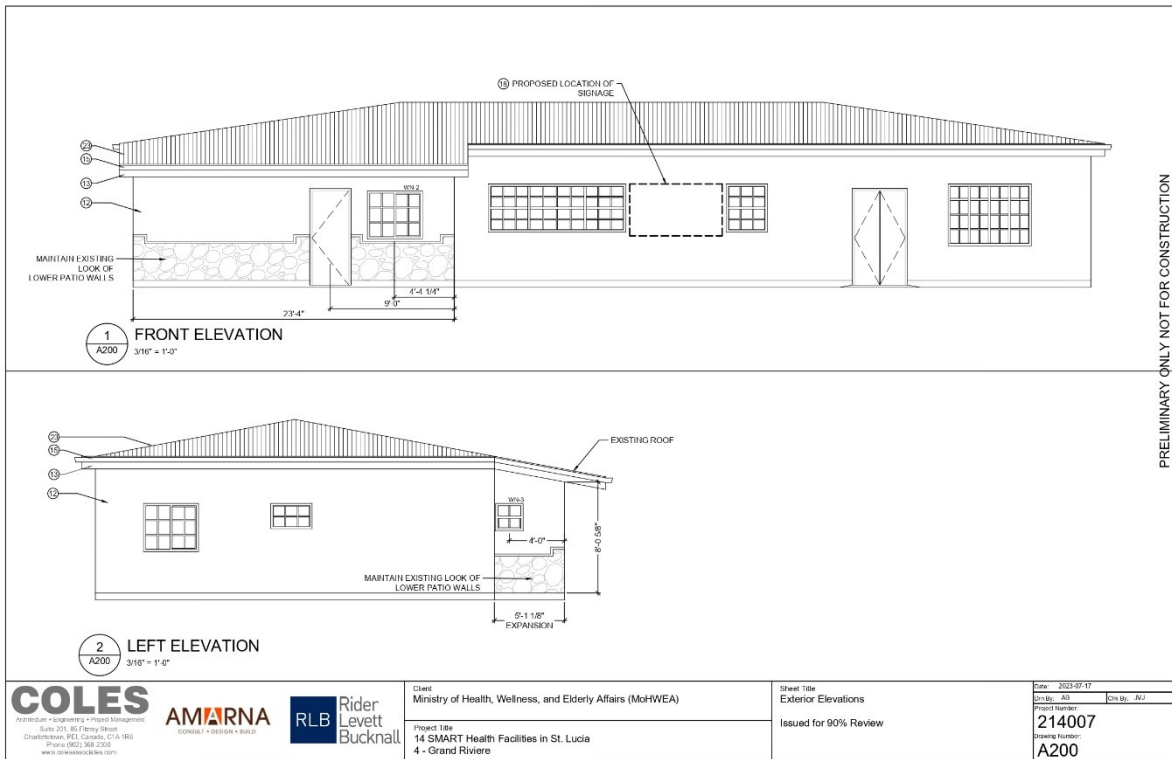
Figure 2 Aerial photo of the Site



PRELIMINARY ONLY NOT FOR CONSTRUCTION



PRELIMINARY ONLY NOT FOR CONSTRUCTION



2.3 SITE SPECIFIC ENVIRONMENTAL AND SOCIAL IMPACTS

Section 4 details the environmental and social impacts envisaged from the retrofit of the 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.

3. LEGAL AND ADMINISTRATIVE FRAMEWORK

Table 1 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

4. SOCIAL AND ENVIRONMENTAL SAFEGUARDS

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 Grand Riviere clinic rehabilitation Grand Riviere 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 currently, this Environmental and Social Management Plan (ESMP) has been prepared for the specific activity.

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 activity can be categorized as comprising simple works, and 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

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.

World Bank Funded projects are classified into 3 main categories. Based on screening the sub-project using the checklist in the

ESMF, the Grand Riviere Wellness Centre is considered as an activity with potential limited adverse environmental

Category A: Business activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented.

Category C: Business activities with minimal or no adverse environmental or social risks and/or impacts.

or social risks and/or impacts that are few, generally site-specific, largely reversible, and readily addressed

through mitigation measures. As such it does not require a Full Environmental Impact Assessment (EIA) but would still require an environmental and social management plan.

5. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
Flora and Fauna	None	None	The Grand Riviere Healthcare facility already exists and is only being renovated.	No mitigation is required onsite
Soil, Groundwater and Surface Water Resources	Soil and Groundwater - Low Surface Water Low	Moderate	The Site is located about 30 meters from a ravine.	<ul style="list-style-type: none"> - Ensure that construction materials including aggregates, and chemicals such as paints, solvents, and stains are properly stored on site and disposed of. - 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.
Environmental damage caused by the workforce	Damage to the environment -- Low	Low	<p>The Contractor may neither follow nor enforce the Code of Conduct (CoC) if his/her employees are in breach.</p> <p>The 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"> - Signing and enforcing the CoC. - Training workers on environmental issues and measures to be taken in the event that actions to protect the environment are necessitated, - Designating an employee to supervise and ensure environmental obligations are complied with. - Incorporating environmental and social issues into the agenda of regular meetings with workers.

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
				<ul style="list-style-type: none"> - 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. - Requiring the immediate and permanent dismissal from the site of any member of the workforce who is committing acts prejudicial to the environment including theft or interference with property and offensive behaviour. - Providing and enforce worker use of appropriate, accessible toilet facilities and of appropriate solid waste disposal facilities.
Interruption of Healthcare Service during Renovation	Moderate to Significant	Moderate	<p>Renovation is expected to be completed in 5 months. During this period residents of Grand Riviere and nearby communities would be temporarily unable to walk to the clinic to receive services and will be required to obtain medical services at a nearby facility, which would be the Gros Islet Polyclinic. The impact will be additional time taken to get to and from alternative clinics in neighbouring communities as well as additional travel costs, thus increasing the cost of accessing healthcare during the renovation period.</p> <p>This also means that the clinic will be unavailable to serve residents requiring urgent medical attention during construction.</p>	<ul style="list-style-type: none"> - Implement an effective communication strategy to inform the public of the dates of closure and where healthcare services can be obtained during the closure. - Assist members of the public with offsetting the cost of transportation to Gros Islet for clinical services through the provision of a shuttle service or another suitable arrangement.

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
			Residents who cannot afford to travel to alternative health facilities may delay accessing medical checkups resulting in higher morbidity and comorbidity rates.	
Air Quality degradation from dust and emissions	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.	<ul style="list-style-type: none"> - Vehicles transporting material to and from the site will be covered. Any accidental spills of materials on the road to and from the site will be cleared as soon as 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 Gros Islet. - Aggregates stored on-site should be covered. Noxious chemical fumes are not envisaged based on the scope of work.
Noise Pollution	Moderate	Low	Grand Riviere is a residential area but several commercial establishments, particularly bars and eating establishments exist in the vicinity of the Wellness Centre. Truck trips to and from the site, the use of power tools and other noise related to construction will create some noise pollution.	<ul style="list-style-type: none"> - Trucks and heavy-duty equipment should operate during regular working hours on weekdays to minimize disturbance to the public. 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 expressed agreement of the Community.
Traffic Management	Moderate	Significant	The main road in this area can be fairly busy during peak hours. The additional traffic	A detailed traffic management plan should be developed to address traffic management, onsite and within Grand

Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
		<p>associated with construction could reduce the safety of the road and exacerbate traffic congestion issues. However the site has a significant setback from the main road and has adequate space onsite for parking and maneuvering construction vehicles onsite.</p> <p>Heavy-duty vehicles also pose a safety risk to pedestrians and other motorists in the community.</p> <p>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>Riviere, Corinth and environs. The plan should achieve the following goals:</p> <ul style="list-style-type: none"> - Reduce interactions between vehicles and pedestrians - Minimise the number of vehicle movements in and around the site - Ensure that all personnel on site are trained and practice traffic safety guidelines - Reducing the need for vehicles to reverse wherever possible as reversing onsite can lead to fatal accidents - No parking or stockpiling of materials will be allowed along the public roadway. - 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 siltation or blockage of drains. - 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. - Parking areas for employees' private vehicles will be located within the worksite only, in approved areas. - Ensure that pedestrians and drivers can see potential hazards, in some cases, personnel can be assigned to traffic management tasks onsite.

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
				<p>Onsite personnel should wear high-visibility clothes and reflective vests.</p> <ul style="list-style-type: none"> - Adequate lighting must be provided onsite particularly if work is to proceed after hours. - Installation of proper signage and instructions. - Compliance with all guidelines and protocols established by the Development Control Authority (DCA) the Department of Transport and Royal St. Lucia Police Force (RSLPF).
Occupational Health and Public Health and Safety	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"> - Ensure that all staff are trained on safety best practices on a construction site. - Ensure that all persons entering the site have adequate PPE. - Ensure that at a minimum the contractor adopts and enforces the Health and Safety Policy and Plan which is in <i>Appendix F</i>.
Exposure to VOCs	Low	Low	Painting and the use of chemicals with strong odours can have an adverse effect on the construction team and other persons traversing the site.	<ul style="list-style-type: none"> - Proper Use of PPE - Scheduling painting for periods when the facility will be closed - Use of water-based paints where possible
Hazards related to demolition	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.	<ul style="list-style-type: none"> - Installation of proper hoarding to prevent the spread of debris and dust into the community. - Completion of demolition works during working hours to avoid
Fire Hazards	Moderate	Low	Demolition debris including timber and drywall as well as oil-based paints, solvents	<ul style="list-style-type: none"> - Adequate training of all staff onsite on fire safety and how fires and explosions can be avoided as well as basic fire suppression techniques.

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
			and other materials are flammable under certain conditions.	<ul style="list-style-type: none"> - Potentially flammable items should be kept in cool locations away from heat, sparks or any potential igniter of the material. - All debris, especially potentially flammable debris should be removed from the site and disposed of as per guidance from SLSWMA.
Slippage and Falling, Working at Heights	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 is the construction of new housing for the standby generator with water tanks installed on the roof.	<ul style="list-style-type: none"> - All staff on site will receive training on reducing the risk of slippage and falls. - Personnel will be required to wear appropriate PPE at all times.

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
Social Impact – Worker influx	Moderate	Low	<p>The successful contractor is likely to bring some or all of his workforce from other communities in Saint Lucia.</p> <p>An influx of workers into the community compounded with the inconvenience caused by the project could lead to negative interactions 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>	<ul style="list-style-type: none"> - Contractors should seek to employ skilled workers from the Grand Riviere and surrounding communities as much as possible. - All persons recruited should be vetted by ensuring that they provide a recent police certificate of character.
Community Conflict and Grievances	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.	<ul style="list-style-type: none"> - Any conflict between the onsite personnel and members of the public should be reported to the PIU and the relevant authorities. - The Contractor should assign responsibility for dealing with complaints from the general public to the site foreman or supervisor. Reports will also

Potential Environmental and Social Impact	Environmental and Social Risk	Environmental and Social Risk	Comment	Proposed Mitigation
				<p>be accepted during consultations with stakeholders and the wider public.</p> <ul style="list-style-type: none"> - The Contractor should 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 should take appropriate measures to ensure - that the site is well-secured in order to protect assets on site. - 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. - 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> - The GRM will have a channel for the uptake of grievances related to SEA/SH and gender-based violence (GBV). - Promote the GRM through ongoing community outreach and consultation - Ensure that there is adequate stakeholder consultation.

		Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
Exposure to Biological hazard		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>	<ul style="list-style-type: none"> - Staff are to be provided with adequate PPE and training for interactions with medical waste and other hazardous materials. - 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.

Operations Stage

		Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
Operations		Low	Low	The smarting of the facility will result in no or little additional pressure on the maintenance and nursing staff.	<ul style="list-style-type: none"> - Training of the maintenance and nursing staff to use any new equipment or technology that is installed as part of the smarting. - The preparation of a maintenance manual for the Wellness Centre

6. PROJECT MANAGEMENT AND INSTITUTIONAL ARRANGEMENTS

6.1 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.
- Publicising the Grievance Redress Mechanism.
- Grievance Redress Management.
- Systematically documenting evidence of its activities and outcomes and providing information to the World Bank team as needed.

Contractor's Responsibilities

The Contractor will be responsible for addressing the following issues within the scope of his/her contract:

- Permits and Approvals
- Site Security
- Worker Occupational Health and Safety
- 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
- Adherence to the Code of Conduct and ensuring the employees sign and follow the Code of Conduct.

6.2 SUPERVISION MONITORING AND REPORTING

6.2.1 Supervision – Construction Phase

Construction

The contractor is responsible to ensure that there is compliance with the ESMP. The ultimate responsibility rests on the PIU to ensure that the ESMP is being followed by the contractor(s) and site workers, which includes adherence to the Health and Safety Policy. During the construction phase, environmental and social monitoring will be carried out by the contractor and the design supervision firm. The PIU's Environmental and Social Specialist will perform spot checks and periodic visits, with day-to-day oversight provided by the contractor and the engineering supervision firm.

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 Site Clerk 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 Environmental Plan.

6.2.2 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.

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.

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 C 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.

6.2.3 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.

7. STAKEHOLDER ENGAGEMENT

7.1 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 and at the site office.

7.2 COMMUNITY ENGAGEMENT

The works, in particular the external works, would require community engagement. For works ongoing within the building, there is a need to ensure that adequate means are utilized to disseminate the information.

A public town hall meeting or a series of meetings is suggested as an effective means of communicating directly with the community and obtaining immediate feedback. However, 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

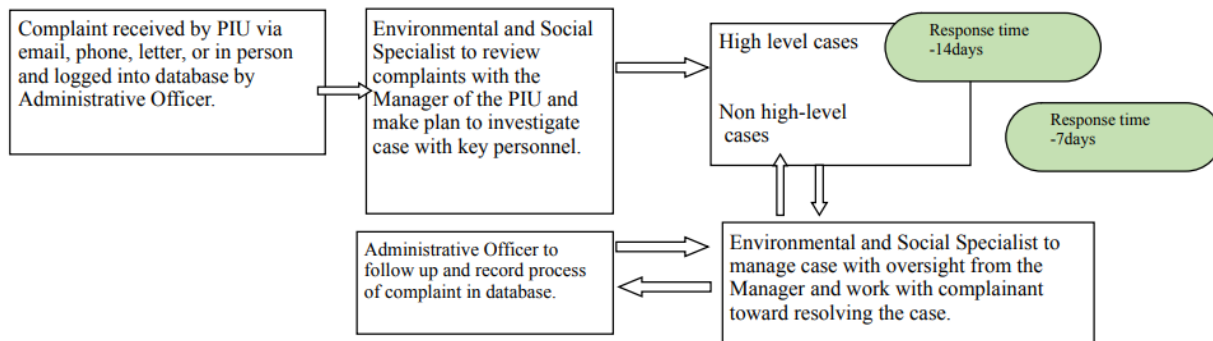
audience. Virtual meetings with members of the community or key stakeholders. These engagements will be conducted in collaboration with the PIU.

STAKEHOLDER CATEGORY	PROJECT MILESTONES	METHOD OF CONSULTATION	FREQUENCY AND RESPONSIBLE PARTIES
Internal:			
MoHWEA Permanent Secretary	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
Wellness Centre Staff	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
Doctors and Pharmacists	Closure of Centre for commencement of physical implementation	Correspondence Meeting	At least two weeks before closure PIU
	Reopening of SMART Centre	Correspondence	TBD
Staff of the Grand Riviere Wellness Centre	Closure of the Grand Riviere Centre and the relocation of services to GIPC	Correspondence Meeting	At least one month before closure PIU
External:			
Parliamentary Representative	Contract signing	Correspondence	TBD PIU

	Closure of Centre	Correspondence	At least two weeks before closure PIU
Grand Riviere Residents	Start of physical implementation and Closure of Centre	Announcements on radio, television and town crier Church Announcements Posters at the Centre prior to closure Project Signboard Community Meeting 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	At least two to three weeks before closure PIU Contractor Supervising Consultant
	Reopening of Centre	Announcements	TBD

8. GRIEVANCE AND REDRESS MECHANISM

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to the project-level grievance redress mechanisms (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

Presented in the table below are the steps to be followed should a grievance arise:

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

	<ul style="list-style-type: none"> • The Social Transformation Officer (STO) for the region provides assistance with dealing with conflict resolution and grievance. • 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.
Resolution and Follow-up	<ul style="list-style-type: none"> • 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.

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 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 approach¹. 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 E&S 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 E&S Specialist can close the case.

¹ 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.

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 E&S 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 E&S 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 a project², 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 E&S Specialist should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH

² Project actors are: (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

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 grievance redress mechanism from that of other project-related grievances. The grievance redress mechanism (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 Grievance Redress Mechanism (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 E&S Specialist assigned to the project will be designated as the key officers in charge of labour grievances resolution.

St. Lucia GBV Service Providers

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2 nd Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	slucps@gmail.com
Family Court	Case Management	Peynier Street, Castries	468-3308	familycourt.slu@gmail.com
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 st Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	police@antitraffickingslu.org
Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	gender.relations@govt.lc
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	stluciacrisis@gmail.com
Women's Support Centre	Legal Aid Psychological Support Livelihood Support		458-4470	WSCCENTER2001@GMAIL.COM

Service Providers	Service Provided	Address	Telephone	Other
	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	raiseyourvoiceslu@gmail.com https://ryvslu.org/
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	info@prosaf.org https://prosaf.org
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	unitedandstrongstlucia@yahoo.com www.facebook.com/Unitedandstrongstlucia/
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	slppa758@gmail.com
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	
Grand Riviere Wellness Centre	Medical Health Services	Grand Riviere, Anse la Raye	468-7700	
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.

9. COSTS FOR ESMP IMPLEMENTATION

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.

10. CONCLUSION

The Grand Riviere 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. It will be important to ensure that the effects of construction on the wider community are mitigated. 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 Grand Riviere and environs.

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

--

B6: Injury Information

Injured Employee

Name:

Job Title:

Job at time of Injury:

Type of Employment

Full – time

Part – time

Temporary

Other

Length of time employed with the Company:

Length of time in current position at the time of the incident:

Description and severity of injury:

Location at the time of the incident/accident

Date and time of incident / Accident:

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 Vincent and the Grenadines.

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 <u>YES</u> add an explanatory comment
<p>Issue: Loss of soil through soil erosion</p> <ul style="list-style-type: none"> - Has any natural vegetation outside the working width of the construction work area been removed? - Are there any visible signs of soil erosion? - Are excavated areas properly maintained to prevent soil erosion? - If any sediment traps have been installed, have they become clogged and not functional? - Are any soil retention/slope stabilisation measures required or being implemented? 				
<p>Issue: Soil Contamination</p> <ul style="list-style-type: none"> - Are there any signs of soil that has been contaminated due to spillage (Petrochemical, cleaning products)? 				
<p>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</p>				

<ul style="list-style-type: none"> - 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? - Have there been any complaints from residents or third parties regarding pollution of water sources/courses/bodies? - Has any construction spoil been disposed of into or adjacent to a water source/course/body? - Are any construction related fuels and chemicals stored within 10m of a water source/course/body? - Has any fuel or chemical leaked during storage, transport to site, use on site or refuelling? - Has any construction related solid or liquid waste entered a water source/course/body within the general project area (including construction site office)? <p>Issue: Prevention of negative landscape and visual impacts.</p> <ul style="list-style-type: none"> - 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?)? - Are there any visible signs of scarring from excavation works that require restoration? 			
<p>Issue: Management and disposal of solid and liquid construction wastes.</p> <ul style="list-style-type: none"> - 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? - Has any contaminated/hazardous material been found during construction? - Is any sub-contractor's waste being disposed of along the roadside or at an unlicensed waste disposal site along the route? - - Has any construction waste of any kind been dumped by the side of the road or along the river embankment? - Are any liquid wastes being discharged to water courses? 			

<ul style="list-style-type: none"> - Has any liquid waste, liquid contaminant leaked unto the site, into any neighbouring lands or water source/course/body? - Is water discharge/pumping in progress? - Is there any Hazardous waste by products on site? 				
<p>Issue: Management of construction noise and vibration.</p> <ul style="list-style-type: none"> - Is any noisy stationary plant being operated adjacent to housing? (If so are they screened to reduce disturbance?) - 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?) - Have there been any noise or vibration related complaints during the last week? 				
<p>Issue: Dust nuisance prevention.</p> <ul style="list-style-type: none"> - Are there any houses adjacent to the construction sites being affected adversely by dust? - Are any crops adjacent to the construction works covered with dust? - Is there any quarry material stored on site that is uncovered or does not have hoarding and subject to dispersal by the wind? - Are any trucks, carrying quarry materials to or from the site, transporting this material uncovered? - Is adequate water available to damp down any dusty operations ongoing on site? - Have there been any dust related complaints during the last week? 				
<p>Issue: Air Pollution (Fumes)</p> <ul style="list-style-type: none"> - Are there any signs of high levels of exhaust/fumes/ malodors? - Have there been any fumes nuisance related complaints during the last week? 				
<p>Issue: Dealing with archaeological finds.</p> <ul style="list-style-type: none"> - Have any potential historic artefacts been found during construction? (If so, note how these have been dealt with). 				
<p>Issue: Construction traffic management.</p> <ul style="list-style-type: none"> - Is there adequate signage to inform motorists of the construction activities ahead? 				

<ul style="list-style-type: none"> - Have there been any complaints about construction traffic impacts (noise, dust, congestion)? - Is there a designated turning/ loading/ offloading area? (If so, is there adequate signage or are a traffic management system being implemented?) - 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) 				
<p>Issue: Dealing with hazardous substances.</p> <ul style="list-style-type: none"> - Have any: old drums or containers, oily sheen, materials with a strong smell or unusual colouration been exposed/damaged during construction excavations? - Are drums containing hazardous material properly stored and adequately labelled on the site? - Has there been any spillage during the last week? (If so, how many, what was spilled, how much and how was it managed?) 				
<p>Issue: Environmental Incidents and Corrective Actions.</p> <ul style="list-style-type: none"> - 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) - 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) 				

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
<p>Q - Looking at the file is there evidence that the Contractor is undertaking the weekly Environmental Inspections and filing the completed Inspection Checklist?</p>			
<p>Q – Looking at the file and the completed weekly Environmental Inspection, has the Supervising Engineer signed the completed checklists?</p>			
<p>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>)</p>			
<p>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?</p>			

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

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]

PROJECT ACTIVITY	STATUS	ADVANCES & CHALLENGES	NEXT STEPS

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

APPENDIX F: SITE PHOTOS





