



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

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

PREPARED FOR

Executed By:



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

Financed By:



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
HSI	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.

2.0 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 2010, the estimated population of Canaries was 1152 persons. Canaries is generally considered to be a deprived community in Saint Lucia. The 2016 National Report on Living Conditions finds 38% of the residents of Anse la Raye/ Canaries live below the national poverty line¹.



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.

¹ 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

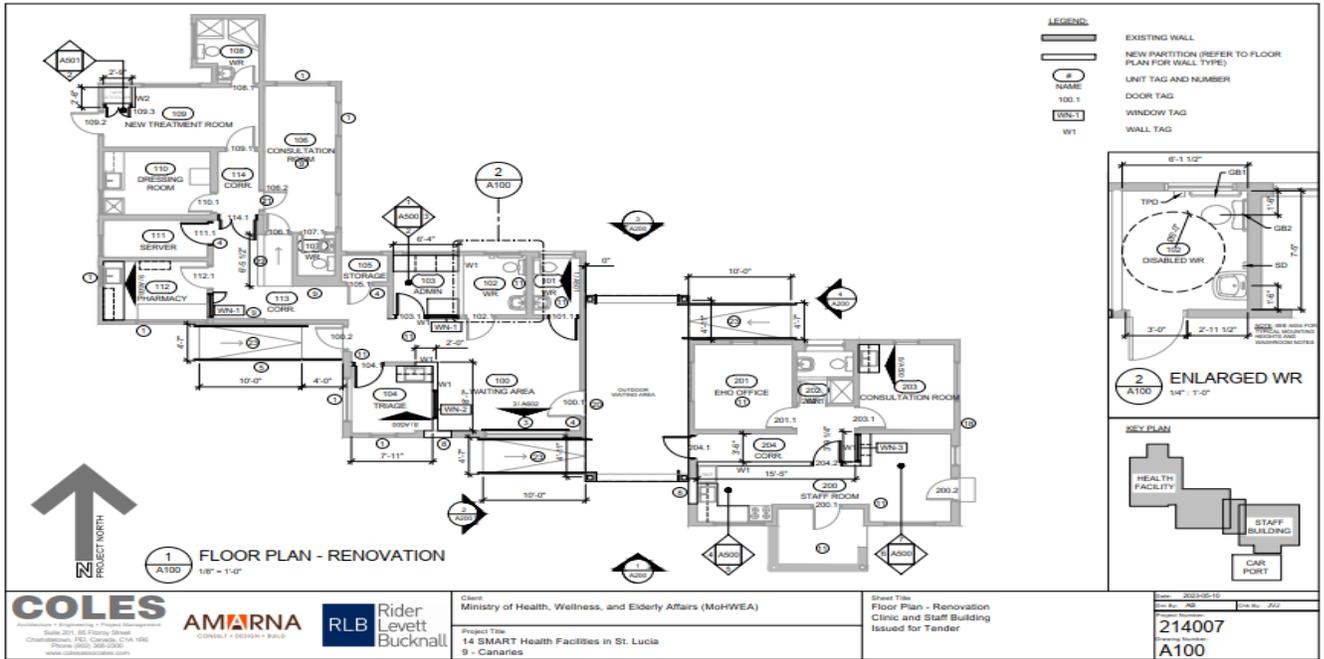
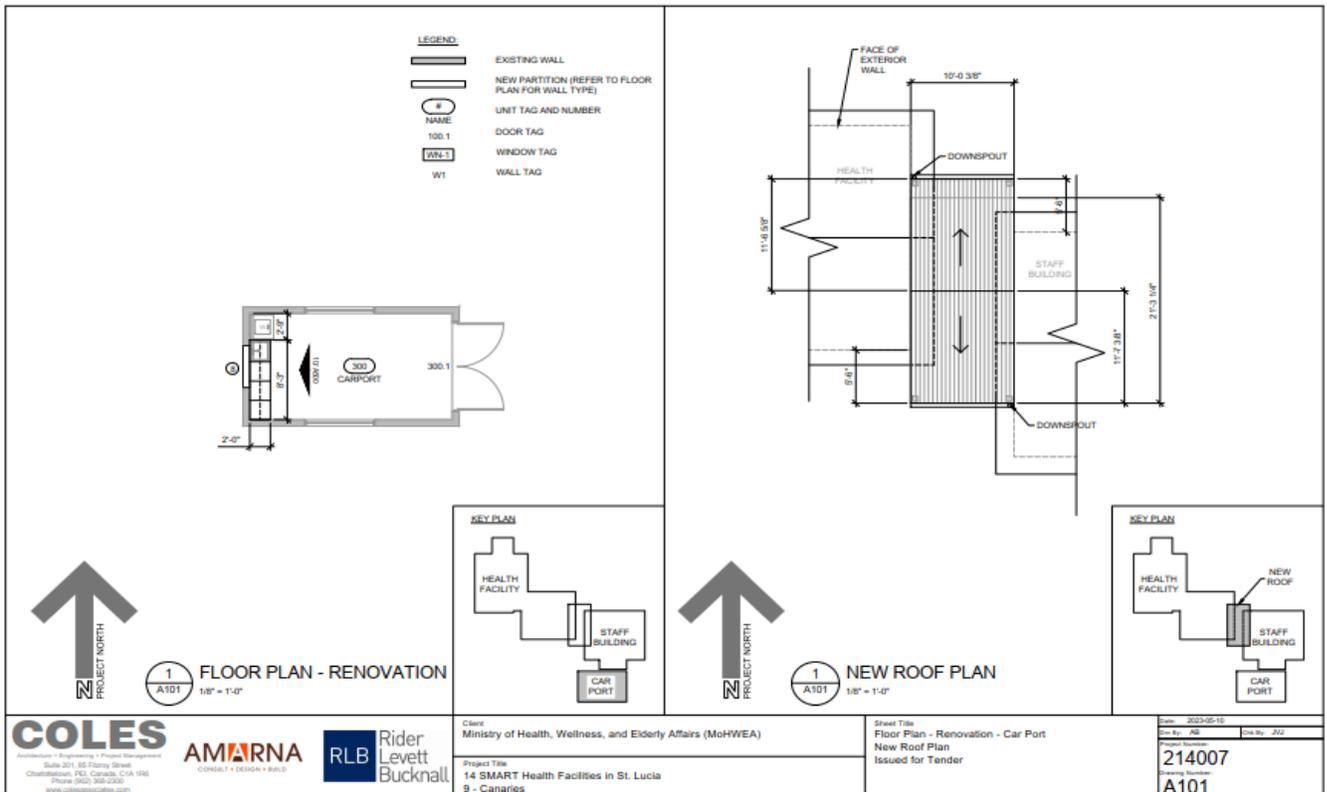


Figure 3. Canaries Wellness Centre Floor Plan



3.0 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

4.0 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 Canaries clinic rehabilitation Canaries 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 Canaries Wellness Centre is considered as an activity with potential limited adverse environmental 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 still requires an environmental and social management plan.

4.1 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.

5. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

5.1 CONSTRUCTION

Table 2- List of 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 Canaries 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 – Moderate – Significant	Moderate	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"> - 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 site and impact any drains, rivers, or water bodies.
Environmental damage caused by the workforce	Damage to the environment -- Low	Low	The Contractor may not follow neither enforce the Code of Conduct (CoC) if his/her employees are in breach. Contractor may not provide relevant training to the workforce.	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: <ul style="list-style-type: none"> - Signing and enforcing the CoC.

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
				<ul style="list-style-type: none"> - 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. - 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	Renovation is expected to be completed in 5 months. During this period residents of Canaries Village and nearby communities will be required to obtain medical services at nearby facilities, which would be the Soufriere Hospital and the Anse la Raye Polyclinic. Residents of Canaries may be temporarily unable to walk to the clinic to receive services. The impact will be additional time taken to get	<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 Soufriere or Anse la Raye 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
			<p>to and from clinics in neighbouring districts as well as additional travel costs, thus increasing the cost of accessing healthcare for the renovation period.</p> <p>This also means that the clinic will be unavailable to serve residents requiring urgent medical attention during construction.</p> <p>Residents who cannot afford to travel to the health facilities in Soufriere and Anse la Raye may delay accessing medical checkups resulting in higher morbidity and comorbidity rates.</p>	
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 Soufriere. - Aggregates stored on-site should be covered. Noxious chemical fumes are not envisaged based on the scope of work.
Noise Pollution	Moderate	Moderate	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	<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,

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
			adjacent to the site, particularly on High Street, where the vehicular and pedestrian entrances to the Clinic site are located.	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	<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.</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>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"> - 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

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
				<p>parking of construction plant within the worksite only. This will be part of the Site Management Plan.</p> <ul style="list-style-type: none"> - 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. Onsite personnel should wear high-visibility clothes and reflective vests. - 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 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

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
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 and other materials are flammable under certain conditions.	<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. - 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. Some of the activities planned on this site include the construction of a small roof connecting two existing structures, the rehabilitation of existing roofing and the demolition and reconstruction of a water tank pad.	<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. 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 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 Canaries community and surrounding areas 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		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.

6.0 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.
- Publicizing the GRM.
- 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 and enforcement of the Code of Conduct by ensuring that the employees sign and follow the CoC.

6.2 SUPERVISION MONITORING AND REPORTING

6.2.1 Supervision

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. 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 and the PIU's E&S Specialist will also ensure that the contractor complies with the Health and Safety Policy and Plan which is also a compliance requirement.

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 are 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. *(See Appendix C for the Project Environmental and Social Safeguards Inspection Weekly Checklist and D for the Monthly Employer's Environmental and Social Safeguards Review Checklist)*

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.

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.

7.0 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, the PIU and at the site office.

7.2 COMMUNITY ENGAGEMENT

Engagement of key stakeholders such as the MoHWEA and the nursing staff at the facility has been ongoing throughout the project preparation stage.

As preparation for the works, in particular the external works begin, there will be need for 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. Table 3 below provides a listing of planned stakeholder engagements.

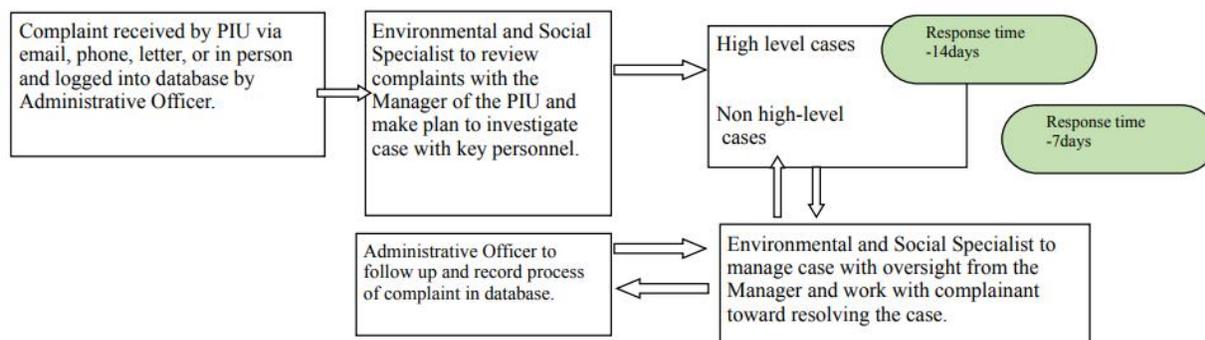
Table 3- Stakeholder Engagement Schedule

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 Nurse Community Health Aides Doctor Pharmacist	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
Staff of the Anse la Raye Wellness Centre	Closure of the Canaries Centre and the relocation of services to Anse la Raye	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
<u>Other Interested Parties</u>	Canaries Police Station Canaries Constituency Council	Correspondence Meetings and regular updates Correspondence Meetings and regular updates	PIU Contractor PIU Contractor
Canaries Residents	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

8.0. 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"> Grievances made verbally to the E&S Specialist (ESS) in person at stakeholder engagement meetings or to the Contractor’s personnel. By email to the following address- mohgrievances@govt.lc By Letter addressed to: The Permanent Secretary Grievance Redress Mechanism (GRM) Attention to E&S Specialist HSSP & OECS Regional Health Projects Department of Health and Wellness 2nd Floor, Sir Stanislaus Building, Waterfront, Castries By letter, addressed to the:
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	<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"> • By phone, at number 758-468-8830 • Or call, text or WhatsApp to 286 7815 • All GBV complaints will be handled directly by the ESS.
Uptake of Grievances	<ul style="list-style-type: none"> • The PIU serves as the access point for grievances
Grievance Log	<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
Assessment	<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 • 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. • The signing of the Grievance Resolution Form.

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. The process is detailed in Appendix

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.

9.0 ESMP IMPLEMENTATION COSTS

ESMP costs will be included in the overall costs and not separated in the BOQ, but the contractor is mandated to undertake the activities in Table 5, however, the contractor can include extraordinary, unique, or unusual E&S related costs in the BOQ if desired.

Table 5 ESMP Implementation Costs which will be incurred by Contractors

ESMP Activity incurring cost
Signage for vehicular and pedestrian traffic management
Traffic safety provisions (barriers, cones, lighting, etc.)
Site signage
PPE
Site Safety equipment / accessories
Environmental and Social Awareness Training including training on the Chance Find Procedure and the Code of Conduct
Public announcements and communications with stakeholders

10. 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.

11. Appendices

APPENDIX A– INCIDENT / ACCIDENT REPORTING FORM

B1: Incident / Accident Details

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

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

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

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 <input type="checkbox"/>	Part – time <input type="checkbox"/>
Temporary <input type="checkbox"/>	Other <input type="checkbox"/>
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. 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 YES add an explanatory comment and mitigation measure
<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>				

Environmental Issue to be considered in site inspection	YES	NO	N/A	If YES add an explanatory comment and mitigation measure
<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? 				

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"> - Are any liquid wastes being discharged to water courses? - 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><i>Issue: Management of construction noise and vibration.</i></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><i>Issue: Dust nuisance prevention.</i></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><i>Issue: Air Pollution (Fumes)</i></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><i>Issue: Dealing with archaeological finds.</i></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><i>Issue: Construction traffic management.</i></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"> - Is there adequate signage to inform motorists of the construction activities ahead? - 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><i>Issue: Dealing with hazardous substances.</i></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><i>Issue: Environmental Incidents and Corrective Actions.</i></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>			

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

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

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 found in Table 4 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 approach². 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 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 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.

(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 project³, 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**.

³ 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).

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 Social Safeguards Focal Point and E&S Specialist assigned to the project will be designated as the key officers in charge of labour grievances resolution.

Table 4. 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.	716-3123	gender.relations@govt.lc

		John Compton Highway, Castries		
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 Assistance with basic needs such as food and shelter		458-4470	WSCCENTER2001@GMAIL.COM
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@prosafe.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	
Soufriere Hospital	Medical Health Services	Soufriere	459-7258	
Canaries Health Centre	Medical Health Services	Canaries	459-4430	
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
La Fargue Health Centre	Medical Health Services	La Fargue, Choiseul	459-3238	
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	

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.

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: _____

Grievance Registers

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

Page Number: [Number]

OECS Regional Health Project Saint Lucia Health System Strengthening Project										
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

OECS Regional Health Project Saint Lucia Health System Strengthening Project			
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):

CONSTRUCTION PHASE HEALTH AND SAFETY PLAN

I hereby certify that I have read the HS plan and will comply with its requirements:

.....

Contractor

.....

Name & Signature

.....

Date

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Section 1. Health and Safety Policies

HSE Policy

The SLU Wellness Centre SMART Upgrade Project recognizes the importance of meeting society's needs for health, safety and protection of the environment. It is our intention to proactively work with employees, contractors, the public, governments and others to use natural resources in an environmentally sound manner while protecting the health and safety of employee, contractors and the public.

We are dedicated to a continuous improvement of our global health, safety and environmental processes while supplying high quality products and services to customers. To meet these responsibilities, we will manage our business according to the following Health and Safety (HS) Policy and Principles.

The SLU Wellness Center SMART Upgrades will conduct its activities in such a way as to maintain:

- plant, equipment, processes, buildings and systems of work that are safe, and without risk to health.
- adequate information, instructions, continuous training and supervision.
- a safe place to work together with safe access to it and egress from it;
- a safe and healthy working environment for employees, contractors, and clients.
- arrangements for the safe storage, transportation and use of hazardous articles and substances.
- adequate prevention of and protection against fire together with appropriate firefighting equipment.
- protection of the environment, prevent pollution, and seek improvements in the efficient use of natural resources; and,
- ensure that health, and safety (HS) matters have equal status with all other primary business objectives.

The SLU Wellness Center SMART Upgrade Project will ensure the implementation of its Construction Health and Safety programs and procedures through the use of feedback from its employees, contractor, audits, inspections and reporting systems.

Managing Director

Date _____

Drug and Alcohol Policy

The SLU Wellness Center SMART Upgrade Project has adopted a drug and alcohol policy that prohibits the possession or use of alcohol, drugs or controlled substances on the job and prohibits working while under the influence of alcohol, drugs or controlled substances.

Any employee/contractor who violates this policy is subject to summary dismissal, even for a first violation.

No Smoking Policy

Smoking is forbidden in all areas of the construction site other than those areas designated as smoking areas. These areas will be clearly identified and signed accordingly.

Contractors Safety Management

Contractors and sub-contractors, who work on the company's construction site, must conduct their activities in a manner consistent with safe and healthy operating practices, and in accordance with all applicable safety and health rules and regulations.

All contractors and subcontractors shall provide their employees with appropriate personal protective equipment and the necessary safety training prior to beginning work.

All contractors and subcontractors are responsible for ensuring that their equipment is in proper working condition and that any unsafe conditions will be corrected.

All contractors must comply with the company's Contractors Safety Policies and communicate it to their employees.

Site Induction

Site induction is an important factor in ensuring contractors/sub-contractors fully understand the environment they will be working in and the systems and procedure they will be expected to follow. A Site Induction must be given to all new employees/contractors working on the site.

The induction should cover the following:

- Introduction and description of the project.
- Site security access and egress.
- Company HS Policies and location
- Contractors/Sub Contractors responsibility
- Welfare facilities toilets, canteen and first aid
- Traffic management system
- Fire risk (alarm procedure/assembly points
- Risk assessments and permit system

- Working at height/scaffolding
 - Excavations
 - Lifting operations
 - Incident/accident and near miss reporting
 - Environmental issues (pollution, noise, dust and light)
-

Protecting the Public and Site Security

The site project team and their contractors must conduct their business without putting members of the public at risk. This includes the public and other workers who may be affected by your work. The Site has a strict access policy and all employees must sign with security and undergo a bag check on entering and exiting the site

Contractors must minimise the potential to injure members of the public and visitors.

Falling objects - You must make sure objects cannot fall from height. Scaffolds must have toe-boards, brick guards and netting where required.

Delivery and other site vehicles - Make sure pedestrians cannot be struck by vehicles entering or leaving the site. Obstructing the pavement during deliveries must be avoided

Scaffolding and other access equipment - Prevent people outside the boundary being struck while they are erecting, dismantling and using scaffolding and other access equipment.

Storing and stacking materials - The storage of materials must be within the site perimeter, preferably in secure compounds or away from the perimeter fencing.

Openings and excavations – Barrier and covers must be used to prevent falls into excavations, manholes, stairwells or from open floor edges.

Welfare and First Aid

Female and Male toilet facilities will be provided on the site and must be kept clean and tidy at all times.

Any employee found misusing these facilities or urinating/defecating on site will be immediately dismissed.

A First aid kit is available in the site offices and security hut where the staff are trained first aiders.

All accidents needing treatment should be reported to the site offices.

Section 2. Site Safety

Personal Protective Equipment

Personal Protective Equipment (PPE) is equipment that will protect the user against health or safety risks at work.

It is a requirement that Safety helmets and safety footwear be worn at all times when on site with gloves, eye protection, high-visibility clothing, dust masks, ear protection and safety harnesses required when carrying out jobs and specific tasks.

Fire and Emergency Procedures

The Site has a general Fire and Emergency Strategy (Appendix 1) but the Contractors are responsible for carry out their own assessment of their section of the works using the following protocol:

- [Risk assessment](#)
- [Means of escape](#)
- [Means of giving warning](#)
- [Means of fighting fire](#)

Risk assessment

There are five steps in carrying out a fire risk assessment:

- **Identify hazards:** consider how a fire could start and what could burn.
- **People at risk:** employees, contractors and visitors
- **Evaluation and action:** consider the hazards and people identified in 1 and 2 and act to remove and reduce risk to protect people and premises.
- **Record, plan and train:** keep a record of the risks and action taken. Make a clear plan for fire safety and ensure that people understand what they need to do in the event of a fire.
- **Review:** your assessment regularly and check it takes account of any changes on site.

Means of Escape

Key aspects to providing safe means of escape on construction sites include:

- **Routes:** your risk assessment should determine the escape routes required, which must be kept available and unobstructed
- **Alternatives:** well-separated alternative ways to ground level should be provided where possible
- **Protection:** routes can be protected by installing permanent fire separation and fire doors as soon as possible

- **Assembly:** make sure escape routes give access to a safe place where people can assemble and be accounted for.
- **Signs:** signage and emergency lighting will be provided as part of the site procedure

Means of giving warning - The site uses an air horn as a fire alarm.

Means of fighting fire - Fire extinguishers are located at identified fire points around the site and in the Site Offices and Security Hut. The extinguishers should be appropriate to the nature of the potential fire:

- Wood, paper and cloth – water extinguisher
- Flammable liquids – dry powder or foam extinguisher
- Electrical – carbon dioxide (CO₂) extinguisher.
- Nominated people should be trained in how to use extinguishers.

Incident / Accident Reporting

All incidents/ accidents must be reported to the construction site management. They will then assist and advise in the investigation of the event and an accident report form should be filled out. They will also advise on additional reporting requirements, immediate / root cause and actions required to prevent a reoccurrence.

Method Statement (MS)

A Method Statement must be provided by the contractor for each element of the work.

The Method Statement is a systematic process for identifying the work to be done, breaking it down into basic steps, identifying potential hazards involved in the work and those that may be created by the work. A hazard is something that has the potential to cause harm or ill health to people, damage to plant equipment or the environment and may impact on the works. This process must involve the full participation of those planning and those carrying out the work activity it must also consider those who may be affected by the work activity. On completing the Method Statement a Method Statement Risk Assessment (MSRA) must be carried out.

Method Statement Risk Assessment (MSRA)

The Contractor has the responsibility for assessing the risk for each element of the works.

There are 8 steps to carrying out a risk assessment:

- **Identify the Hazard**
- **Identify those at risk**
- **Identify existing control measures**
- **Evaluate the risk**
- **Decide/implement control measure**

1. **Elimination** – To get rid of the risk altogether
2. **Substitution** – To exchange one risk for something less likely or severe
3. **Physical Controls** – separation/isolation, eliminate contact with the hazard.
4. **Administrative controls** – A safe system of work procedures in place to ensure safe use/contact with hazard.
5. **Information, Instruction, Training and Supervision** – To warn people of hazard and tell/show/help how to understand and deal with it.
6. **Personal Protective Equipment** – Don appropriately to reduce severity of incident/ accident.

- **Record Assessment**
- **Monitor and review**
- **Communicate to all those affected by the work**

Working at Heights

Work at height requires that you take account of your risk assessment in organizing and planning work and identifying the precautions required.

The approaches you can adopt for work at height are to:

- Avoid work at height where it reasonably practicable to do so.
- Prevent any person falling a distance liable to cause personal injury e.g. by using a scaffold platform with double guard-rail and toe boards.
- Arrest a fall with equipment to minimize the distance and consequences of a fall, e.g. safety harnesses, where work at height cannot be avoided or the fall prevented.

Roof Work - You must organize and plan all roof work so it is carried out safely.

All work on roofs is highly dangerous, even if a job only takes a few minutes. Proper precautions are needed to control the risk.

Those carrying out the work must be trained, competent and instructed in use of the precautions required.

Key issues are:

- Safe Access to Roof
- Roof edges and openings
- Fragile surfaces

Safe Access - Safe access to a roof requires careful planning, particularly where work progresses along the roof.

Methods to access roofs are:

- General access scaffolds;
- Stair towers;

- Fixed or mobile scaffold towers;
- Mobile access equipment;
- Ladders;
- Roof access hatches.

Roof Edges and Openings

- **Sloping roofs:** sloping roofs require scaffolding to prevent people or materials falling from the edge. You must also fit edge protection to the eaves of any roof.
- **Flat roofs:** falls from flat roof edges can be prevented by simple edge protection arrangements – a secure double guardrail and toe board around the edge.

Fragile Surfaces

- **Fragile roofs:** all roofs should be treated as fragile until a competent person has confirmed they are not. Do not trust any sheeted roof, whatever the material, to bear the weight of a person. This includes the roof ridge and purling.
- **Fragile roof lights** are a particular hazard. Some are difficult to see in certain light conditions and others may be hidden by paint. You must provide protection in these areas, either by using barriers or covers that are secured and labeled with a warning.

Using Ladders Safely

Every time you use a ladder you should do a pre-use check beforehand to make sure that it is safe for use. A pre-use check should be carried out by:

Tower Scaffolds

Those using tower scaffolds should also be trained in the potential dangers and precautions required during use. Tower scaffold provision and use must be properly managed and include rigorous scaffold inspection arrangements.

Key issues with tower scaffolds are:

- Erection and Dismantling
- Stability
- Fragile surfaces
- Precautions and inspections

Lifting Operations

All lifting operations involving lifting equipment must be properly planned by a competent person; appropriately supervised; and carried out in a safe manner.

Cranes and lifting accessories such as slings must be of adequate strength, tested and subject to the required examinations and inspections.

All crane operators, and people involved in slinging loads and directing lifting operations, must be trained and competent.

There are four key aspects to the safe use of cranes:

- [Planning lifting operations](#)
- [Safe systems of work](#)
- [Supervision of lifting](#)
- [Thorough examination](#)

Excavators Used For Lifting Operations

The use of excavators for lifting operations needs to be carefully planned and supervised. Excavators and backhoes are designed for rapid earth moving and are not designed for lifting operations as their principal function. When planning a lifting operation, you should firstly consider whether an excavator is the most appropriate machine, taking into account the type of lift and the duration of the task.

Excavators should not be used under any circumstances for the lifting of persons as they are primarily designed for excavating with a bucket and consequently are capable of operating speeds and movements which make them totally unsuitable for the lifting of persons

Electrically Powered Equipment

It is the responsibility of the employer or Contractor to ensure that electrical equipment used for work is safe:

- Perform a Risk Assessment to identify the hazards, the risks arising from those hazards, and the control measures you should use.
- Check that the [electrical equipment is suitable](#) for the work and way in which it is going to be used.
- Check that the [electrical equipment is in good condition](#).
- Check that the [equipment is suitable for the electrical supply](#) with which it is going to be used, and the [electrical supply is safe](#).
- It is often beneficial to use a [Residual Current Device \(RCD\)](#) between the electrical supply and the equipment.
- Make sure that the user of the equipment is trained to use it safely.
- Make sure the user knows which personal protective equipment to wear, how to use it, and make sure they do.

Mobile Plant and Equipment

Common to the use of all mobile plant and vehicles is the need to segregate vehicles from pedestrians, train staff to use the machines competently; and make sure that the machines are regularly inspected, serviced and maintained.

Excavators, Dumpers & Telehandlers –

The plant used must be carefully selected, maintained and operated by trained drivers. Key issues are:

- [Equipment hazards](#)
- [Controlling the risk](#)
- [Training and competence](#)
- [Inspection and maintenance](#)

A safe workplace for all vehicle operations must be established by separating pedestrians and vehicles and providing hazard-free traffic routes

Equipment Hazards

- Moving – and strikes a pedestrian, particularly while reversing;
- Slewing – trapping a person between the excavator and a fixed structure or vehicle
- Working – when the moving bucket or other attachment strikes a pedestrian or when the bucket inadvertently falls from the excavator.
- Overturning – over 60% of dumper deaths involve the driver when the vehicle overturns.
- Collision – most other deaths occur when pedestrians are struck by the dumper when it is reversing or going forwards on site.

Controlling the Risk

- **Exclusion:** People should be kept away from areas of excavator operation by the provision of suitable barriers.
- **Clearance:** When slewing in a confined area the selection of plant with minimal tail swing is preferred. Clearance of over 0.5m needs to be maintained between any part of the machine, particularly the ballast weight, and the nearest obstruction.
- **Visibility:** Excavators with the best view around them directly from the driver position should be selected. Excavators should be equipped with adequate visibility aids to ensure drivers can see areas where people may be at risk from the operation of the machine.
- **Signallers:** A signaller should be provided in a safe position to direct excavator operation and any pedestrian movements
- **Gradients:** Plan the work so that dumpers are used on gradients that are within their safe working capacity. Check with the manufacturer
- **Loading:** Make sure loads are distributed evenly and provide purpose-built platforms for regularly transported items, e.g. large drums.
- **Ground conditions:** Working on sloping, uneven or unstable ground can be hazardous. Telehandlers normally require prepared, flat, graded surfaces to operate safely. Even rough-terrain lift trucks have strict operational limits that need to be observed

Training and Competence

- Drivers: should be trained, competent and authorized to operate the specific excavator. Training certificates from recognized schemes help demonstrate competence and certificates should be checked for validity
- Signallers: should be trained, competent and authorized to direct excavator movements and, where possible, provided with a protected position from which they can work in safety

Inspection and Maintenance

A program of daily visual checks, regular inspections and servicing schedules should be established in accordance with the manufacturer's instructions and the risks associated with each vehicle.

Excavation Work / Structural Stability

You must prevent danger to workers in or near excavations. To maintain the required precautions, a competent person must inspect excavation supports or battering at the start of the working shift and at other specified times. No work should take place until the excavation is safe.

Key issues are:

- Collapse of Excavation
- Falling or Dislodging Material
- Falling into Excavation
- Inspection

Collapse of excavations

- Temporary support – Before digging any trench pit, tunnel, or other excavations, decide what temporary support will be required and plan the precautions to be taken.
- Make sure the equipment and precautions needed (trench sheets, props, baulks etc) are available on site before work starts.
- Battering the excavation sides – Battering the excavation sides to a safe angle of repose may also make the excavation safer.

Falling or dislodging material

- Loose materials – may fall from spoil heaps into the excavation. Edge protection should include toe boards or other means, such as projecting trench sheets or box sides to protect against falling materials. Head protection should be worn.
- Undermining other structures – Check that excavations do not undermine scaffold. Decide if extra support for the structure is needed before you start.
- Effect of plant and vehicles – Do not park plant and vehicles close to the sides of excavations. The extra loadings can make the sides of excavations more likely to collapse.

Falling into excavations

- Guard rails and toe boards inserted into the ground immediately next to the supported excavation side
- Fabricated guard rail assemblies that connect to the sides of the trench box

The support system itself, e.g. using trench box extensions or trench sheets longer than the trench depth.

APPENDIX H- SITE PHOTOS









