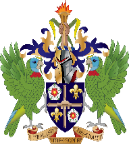
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**Executed By:**

The Government of St. Lucia

Ministry of Health, Wellness and Elderly Affairs



**Financed By:**



International Bank for Reconstruction & Development

**PREPARED FOR**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN**

**For the Preparation of Design, Bidding Documents**

**Supervision and BOQs for the Delcer Wellness Centre**

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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 Delcer Wellness Centre.

## 2.1 Project Context

Delcer is a rural inland community located in the Quarter of Choiseul. In 2010, the estimated population of Delcer was 291 persons. The 2016 National Report on Living Conditions found that the poverty headcount in Choiseul had decreased significantly from 38.4% in 2006 to 16.9% in 2016[[1]](#footnote-1).

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Figure 1 Location of the site within Delcer, Choiseul

The nearest healthcare facilities in the Choiseul community are the La Fargue and Mongouge Wellness Centres which are both about 6 kilometers and 5 kilometers from the Delcer respectively. The project entails the implementation of upgrades to improve the functionality of the clinic, improve its structural soundness and make it a greener facility, by improving its energy efficiency.

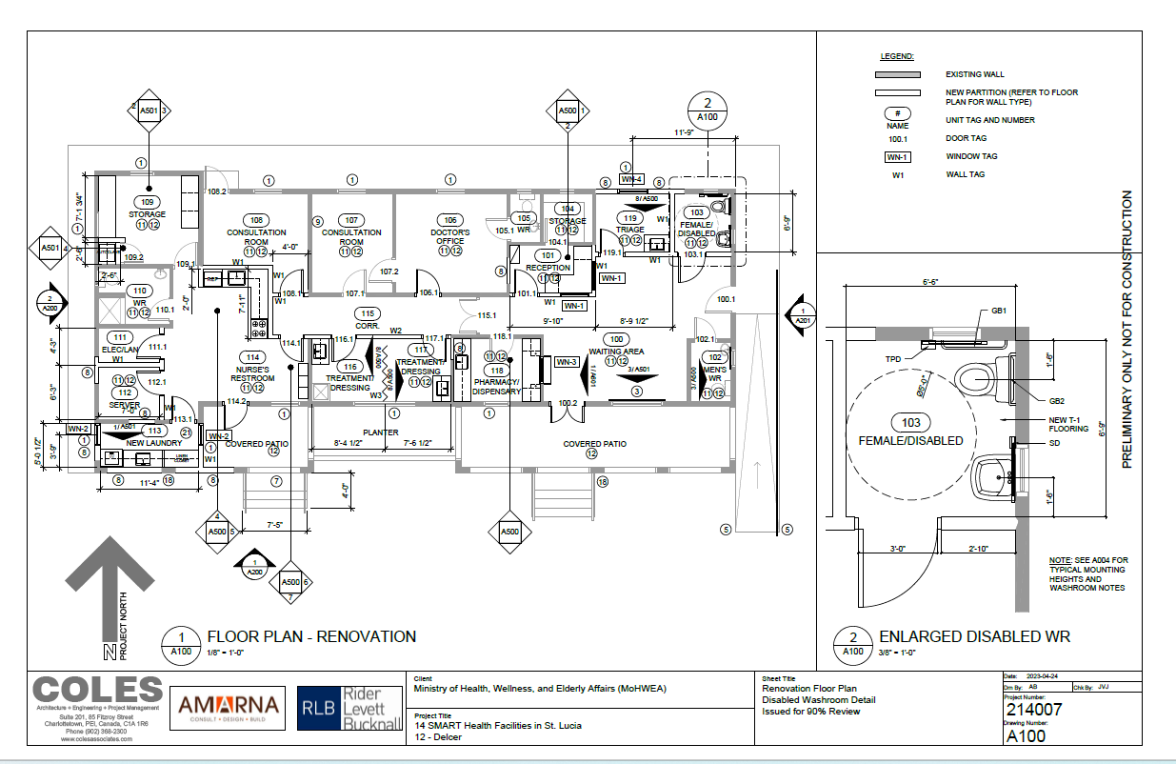
## 2.2 Project Scope

The rehabilitation of the Delcer Wellness Centre includes:

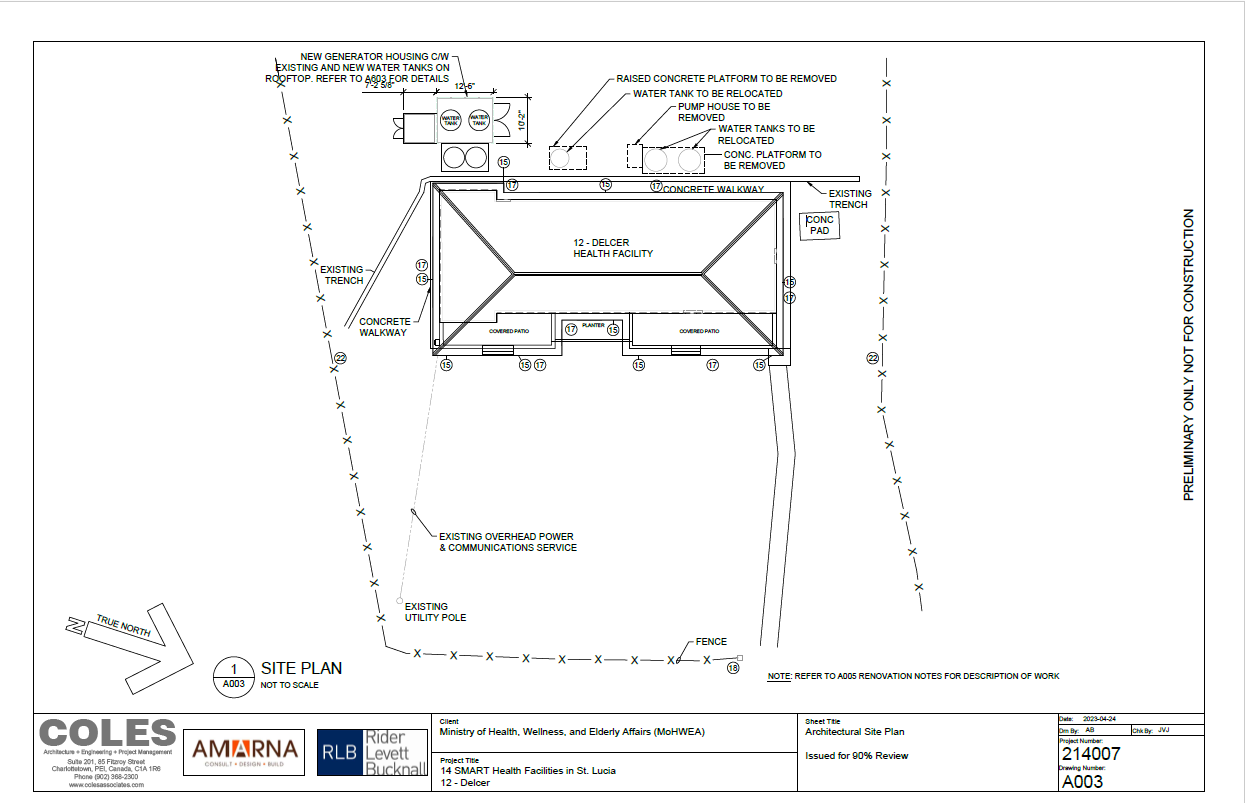
1. construction of new housing for the standby generator and demolition of existing raised pad for generator with existing and new water tanks installed on the rooftop.
2. Rewiring of the electrical and communication systems in the building including the installation of energy-efficient luminaires, fire alarm, emergency signage, data outlets, switches, electrical outlets and other associated items
3. Reconfiguration of internal partitions to improve functionality including the demolition of existing partitions and installation of new partitions
4. Improvements to HVAC
5. Retrofit 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
6. Repairs to perimeter fence and gate
7. Installation of new Gypsum ceilings above new laundry room
8. Repair and repainting of existing metal grilles at doors and windows
9. Installation of exterior signage
10. Repainting of all existing ceilings in white to improve energy efficiency
11. Reconstruction of external concrete stair
12. Installation of handrail to external concrete ramp
13. Installation of new furniture including cabinets, desks and cupboards in reception area, nurse’s rest room, triage room, treatment/dressing room, pharmacy, laundry, autoclave area, and waiting area
14. Replacement of floor finish with durable porcelain tiling

****

***Figure 2 Aerial photo of the Site***



**Figure 4. Delcer Wellness Centre Floor Plan**



**Figure 5. Delcer Wellness Centre Site 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.

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# 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 Delcer 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 Delcer 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 Delcer Wellness Centre. 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, resulting in the clients having to travel to the nearby centres at Mongouge and La Fargue roughly 6 kilometres away, for service during the construction phase. However, the Delcer community has a fairly reliable public transport service available for residents to utilize.

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 Delcer 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 – Low | Moderate | A small natural watercourse exists to the south of the Delcer Wellness Centre. Although this is an ephemeral stream, and is not a source of potable water, any harmful discharge into it can have negative downstream impacts on biodiversity and human activities including fisheries and recreation. | * 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:   * Signing and enforcing the CoC. * Training workers on environmental issues and measures to be taken in the event that actions to protect the environment are necessitated, * Designating an employee to supervise and ensure environmental obligations are complied with. * Incorporating environmental and social issues into the agenda of regular meetings with workers. * 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 Delcer and nearby communities will not be able to walk to the clinic to receive services and will have to obtain medical services at nearby facilities, which would be the La Fargue and the Mongouge Wellness Centres. The impact will be additional time taken to get to and from clinics in neighbouring communities as well as additional travel costs, thus increasing the cost of accessing healthcare for the renovation period.  This also means that the clinic will be unavailable to serve residents requiring urgent medical attention during construction.  Residents who cannot afford to travel to the other health facilities in may delay accessing medical checkups resulting in higher morbidity and comorbidity rates. | * Implement an effective communication strategy to inform the public of the dates of closure and where healthcare services can be obtained during the closure. Also, to encourage residents to schedule their checks prior to the closure to reduce the number of trips to the other facilities. * Assist members of the public with offsetting the cost of transportation to other clinics through the provision of a shuttle service or another suitable arrangement. |
| 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. | * 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 | Truck trips to and from the site, the use of power tools and other noise related to construction will create some noise pollution in the community, particularly for properties adjacent to the site, particularly on High Street, where the vehicular and pedestrian entrances to the Clinic site are located. | * Trucks and heavy-duty equipment should operate during regular working hours on weekdays to minimize disturbance to the public. Onsite construction activities involving air compressors, jackhammers, power-driven drills, riveting machines, excavator, diesel-powered truck, tractor or other earth-moving equipment, hand hammers on steel or iron, or any other machine, tool, device or equipment which makes loud noises will not be used outside of regular weekday working hours, except in extraordinary circumstances or with the expressed agreement of the Community. |
| Traffic Management | Moderate | Significant | The Delcer main road and the secondary road have relatively low levels of traffic daily.  Large trucks and heavy-duty vehicles can damage the road surface.  Heavy-duty vehicles also pose a safety risk to pedestrians and other motorists in the community.  Vehicles can also pose a hazard to personnel on the site, particularly from trucks reversing onto the site to deliver materials or pick up debris and waste. | A detailed traffic management plan should be developed to address traffic management, onsite and within Delcer. The plan should achieve the following goals:   * Reduce interactions between vehicles and pedestrians * Minimise the number of vehicle movements in and around the site * Ensure that all personnel on site are trained and practice traffic safety guidelines * Reducing the need for vehicles to reverse wherever possible as reversing onsite can lead to fatal accidents * No parking or stockpiling of materials will be allowed along the public roadway. * No materials shall be stored so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public or result in siltation or blockage of drains. * Contractor should plan for the temporary storage of construction materials and wastes, and the parking of construction plant within the worksite only. This will be part of the Site Management Plan. * Parking areas for employees’ private vehicles will be located within the worksite only, in approved areas. * Ensure that pedestrians and drivers can see potential hazards, in some cases, personnel can be assigned to traffic management tasks onsite. 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 DCA the Department of Transport and 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. | * Ensure that all staff are trained on safety best practices on a construction site. * Ensure that all persons entering the site have adequate PPE. * Ensure that at a minimum the contractor adopts and enforces the Health and Safety Policy and Plan which is found in *Appendix F.* |
| 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. | * Proper use of PPE * Scheduling painting for periods when the facility will be closed * Use of water-based paints where possible |
| Hazards related to demolition | Low – Moderate | Low | Minor internal and external demolition works are planned on this site. Although the scope of demolition is not significant, best practices must be employed to reduce the chances of adverse effects on the safety of the workers and the wider community. | * Installation of proper hoarding to prevent the spread of debris and dust into the community. * Completion of demolition works during working hours to avoid excessive disturbance of the community. |
| 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. | * 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. | * 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. |
| Social Impact – Worker influx | Moderate | Low | The successful contractor is likely to bring some or all of his workforce from other communities in Saint Lucia. The community of Choiseul has high levels of unemployment (24.25% in 2020). An influx of workers into the community compounded with the inconvenience caused by the project could lead to negative interactions with the community.  Additionally, if onsite staff are not properly screened before they are hired, the influx of staff could expose the community to dangerous individuals.  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. Additionally, workers are expected to be in the community primarily during working hours. | * Contractors should seek to employ skilled workers from the Delcer 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. | * 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 be accepted during consultations with stakeholders and the wider public. * 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). *A template of the CoC is in Appendix B*. * 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. |
| Exposure to Biological hazard | Moderate | Moderate | Onsite staff may encounter medical waste during renovation.  Staff may also encounter other workers onsite who may present with infectious diseases including those of a respiratory nature.  The nearest Wellness Centre is the Mongouge Centre  The nearest hospital is the Soufriere Hospital  The nearest ambulance is at the Soufriere Fire Station | * 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 for ensuring 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.

In preparation for the works, in particular the external works, there will be the need for community engagement. It is also vital 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 can be utilized when face-to-face engagement is not possible. 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 | PIU  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 | PIU  TBD |
| Reopening of SMART Centre | Correspondence | TBD |
| **Staff of the Mongouge and La Fargue Wellness Centres** | Closure of the Delcer Wellness Centre and the relocation of services to La Fargue and Mongouge | 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 |
| **Other Interested Parties** | Choiseul Police Station  Choiseul Constituency Council | Correspondence  Meetings and regular updates  Correspondence  Meetings and regular updates | PIU  Contractor  PIU  Contractor |
| **Delcer Community /Residents**  **Community and wider public** | Start of physical implementation and Closure of Centre | Meeting  Project signboard | At least two to three weeks before closure  PIU  Consultant |
| Progress Update | Meeting | Midway through physical implementation  Contractor  Supervising Consultant |
| Reopening of Centre | Announcements | PIU |
| Progress Updates | Announcements on radio, television and town crier  Church Announcements  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 | Throughout physical implementation  PIU  Contractor  Consultant |

# 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 illustrates the grievance redress process.

A picture containing text, screenshot, font, diagram

Description automatically generated

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:

|  |  |
| --- | --- |
| Grievances from affected parties | * 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](mailto: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:   The Project Coordinator  Project Implementation Unit  OECS Regional Health Project  Sure Line Building  Vide Boutielle Highway  Castries  Saint Lucia   * By phone, at number [758-468-8830](callto:758-468-8830) * Or call, text or WhatsApp to 286 7815 * All GBV complaints will be handled directly by the ESS. |
| Uptake of Grievances | * The PIU serves as the access point for grievances |
| Grievance Log | * Grievances received verbally are documented, verified and signed by both parties. * Grievances will be copied to the relevant authority |
| Assessment | * 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 | * 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 Delcer 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. 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 the Choiseul Police Station, Saint Lucia Fire Service and Community Based organisations in Choiseul 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 |
| 1. *Details of the Incident / Accident* |
| 1. *What were the conditions or circumstances under which the incident occurred (if known)?* |
| 1. *Are the basic facts of the incident clear, or are there conflicting versions? What are those versions?* |
| 1. *Is the incident still ongoing, or is it contained?* |
| 1. *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 ☐; No ☐; | | | |

**Please attach a copy of the instruction suspending the works.**

|  |
| --- |
| B5: What support has been provided to affected people |
|  |

|  |  |
| --- | --- |
| B6: Injury Information | |
| Injured Employee | |
| Name: | Job Title: |
| Job at time of Injury: | |
| Type of Employment  Full – time ☐ Part – time ☐ Temporary ☐ Other ☐ | |
| Length of time employed with the Company: | |
| Length of time in current position at the time of the incident: | |
| Description and severity of injury: | |
| Location at the time of the incident/accident | |
| Date and time of incident / Accident: | |

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

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

***Note to the Employer****:*

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

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

**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:
   1. ensuring that workplaces, machinery, equipment and processes under each person’s control are safe and without risk to health;
   2. wearing required personal protective equipment;
   3. using appropriate measures relating to chemical, physical and biological substances and agents; and
   4. 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.

1. **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** |
| --- | --- | --- | --- | --- |
| ***Issue: Loss of soil through soil erosion***   * 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? |  |  |  |  |
| ***Issue: Soil Contamination***   * Are there any signs of soil that has been contaminated due to spillage (Petrochemical, cleaning products)? |  |  |  |  |
| ***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***   * 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)?   ***Issue: Prevention of negative landscape and visual impacts.***  - 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 scaring from excavation works that require restoration? |  |  |  |  |
| ***Issue: Management and disposal of solid and liquid construction wastes.***   * Has any construction related packaging (especially cement bags) been disposed of on the side of the road, in vacant land, along river embankments or in the river channel, or at any unofficial waste disposal site along the route? * Has any contaminated/hazardous material been found during construction? * Is any sub-contractor’s waste being disposed of along the roadside or at an unlicensed waste disposal site along the route? * Has any construction waste of any kind been dumped by the side of the road or along the river embankment? * Are any liquid wastes being discharged to water courses? * 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? |  |  |  |  |
| ***Issue: Management of construction noise and vibration.***   * 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? |  |  |  |  |
| ***Issue: Dust nuisance prevention.***   * 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? |  |  |  |  |
| ***Issue: Air Pollution (Fumes)***   * Are there any signs of high levels of exhaust/ fumes/ malodors? * Have there been any fumes nuisance related complaints during the last week? |  |  |  |  |
| ***Issue: Dealing with archaeological finds.***  - Have any potential historic artefacts been found during construction? (If so, note how these have been dealt with). |  |  |  |  |
| ***Issue: Construction traffic management.***  - 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) |  |  |  |  |
| ***Issue: Dealing with hazardous substances.***  - 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?) |  |  |  |  |
| ***Issue: Environmental Incidents and Corrective Actions.***   * 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** |
| **Q** - Looking at the file is there evidence that the Contractor is undertaking the weekly Environmental Inspections and filing the completed Inspection Checklist? |  |  |  |
| **Q** – Looking at the file and the completed weekly Environmental Inspection, has the Supervising Engineer signed the completed checklists? |  |  |  |
| **Q** – Looking at the file is there evidence that the Contractor is maintaining the log of environmental incidents/complaints? (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.) |  |  |  |
| **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? |  |  |  |
| **Q** – Looking at the file is there evidence that any Social Safeguards or Grievances have been recorded? |  |  |  |

|  |  |
| --- | --- |
| ***MONTHLY EMPLOYER’S ENVIRONMENTAL AND SOCAL SAFEGUARDS REGISTER REVIEW – ADDITIONAL COMMENTS***  ***If required, provide supporting comments relating to specific points above.*** | |
| **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 approach[[2]](#footnote-2). Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

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

**ACTION 1: complaint intake and REFERRAL**

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

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

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

**ACTION 2: INCIDENT REPORTING**

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

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

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

As long as the SEA/SH remains open the PIU 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 project[[3]](#footnote-3), the verification committee discusses appropriate actions to be recommended to the appropriate party i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator’s employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

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

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in the St. Lucian legal system, the PIU E&S Specialist should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU E&S Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

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

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

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

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

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

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

The Project Coordinator (PC) and the 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.

**St. Lucia GBV Service Providers**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Service Providers** | **Service Provided** | **Address** | **Telephone** | **Other** |
| Attorney General | Case Management | 2nd 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](mailto:slucps@gmail.com) |
| Family Court | Case Management | Peynier Street, Castries | 468-3308 | [familycourt.slu@gmail.com](mailto: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  1st Floor Sir Stanislaus Bldg. Waterfront Castries | 468-3754 | [police@antitraffickingslu.org](mailto:%20police@antitraffickingslu.org) |
| Department of Gender Affairs | Psychosocial Support  Livelihood Support | Ground Floor Georgian Court Bldg. John Compton Highway, Castries | 716-3123 | [gender.relations@govt.lc](mailto:gender.relations@govt.lc) |
| Abuse Hotline | Psychosocial Support |  | 202 |  |
| St. Lucia Crisis Centre | Psychological Support  Livelihood Support  Assistance with basic needs such as food and shelter | 107 Chausse Road, Castries | 453-1521  712-7574 | [stluciacrisis@gmail.com](mailto: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](mailto:WSCCENTER2001@GMAIL.COM) |
| Raise your Voice St. Lucia Inc | Psychological Support  Livelihood Support | Manoel Street, Castries | 726-0473 487-2329 | [raiseyourvoiceslu@gmail.com](mailto:raiseyourvoiceslu@gmail.com)  <https://ryvslu.org/> |
| Positive Reactions Over Secrets And Fears (PROSAF) | Psychological Support | PO Box 973 Castries | 724-9991 | [info@prosafe.org](mailto:info@prosafe.org)  <https://prosaf.org> |
| Girls Of A Feather | Mentorship and Advocacy for Adolescent Girls in Saint Lucia. | American Drywall Building Vide Bouteille Castries | 519-7263 | [info@girlsofafeatherslu.org](mailto:info@girlsofafeatherslu.org) |
| United and Strong | Assistance for LGBTI persons | P.O. BOX 772 Castries, | 450-0976 | [unitedandstrongstlucia@yahoo.com](mailto:unitedandstrongstlucia@yahoo.com)  [www.facebook.com/Unitedandstrongstlucia/](http://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](mailto: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**

**Complaint Number: [Number]**

**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*

1. Today’s date: Day Month Year
2. Parish:
3. 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** | **Contact Details** | **Incident** | **Information request /** | **Received by** | **Response** | **Date of request /** | **Action Taken (under** | **Date** |
| **#** | **age) of the** |  | **date** | **complaint** |  | **provided / action** | **incident response** | **review, investigation,** | **Closed** |
|  | **complainant** |  |  |  |  | **taken** |  | **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 | Was the alleged perpetrator was/is, | Survivor’s age and/or sex | Was the |
| says in her/his own words without direct | to the survivor’s best knowledge, | (if disclosed) | survivor |
| questioning) | associated with the project |  | referred to |
|  | (yes/no) |  | 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: ………………………………………………………………………………………………………………………

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Decisions taken / Recommendations: ……………………………………………………………………………………………….

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……………………………………………………………………………………………………………………………………………………………

……………………………………………………………………………………………………………………………………………………………

Issue Solved / Unsolved Signature of Chairperson of the meeting:

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

Date: ………………………………………. (DD/MM/YYYY)

**Grievance Closure Form**

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

Result of Grievance Redressal

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

Signature of the Complainant in acceptance of the Solution to his /her Grievance Name:……………………………………………………………………………………….

National ID number: ………………………………..

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

Name: …………………………….………………………………………………………..….

Place: ……………………………………………………...…………………………………..

Date:(dd –mm – yyyy): ………………………………………..

## appendix g- health and safety plan

**CONSTRUCTION PHASE HEALTH SAFETY PLAN**

**I hereby certify that I have read the H&S 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 Projectrecognizes 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, and safety 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**

**March 2023**

**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 HSE Polices 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 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, dusk 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](http://www.hse.gov.uk/construction/safetytopics/generalfire.htm#risk)
* [Means of escape](http://www.hse.gov.uk/construction/safetytopics/generalfire.htm#escape)
* [Means of giving warning](http://www.hse.gov.uk/construction/safetytopics/generalfire.htm#warning)
* [Means of fighting fire](http://www.hse.gov.uk/construction/safetytopics/generalfire.htm#fighting)

**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 (C02) 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** – Asafe 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](http://www.hse.gov.uk/construction/safetytopics/cranes.htm#planning)

[Safe systems of work](http://www.hse.gov.uk/construction/safetytopics/cranes.htm#safe)

[Supervision of lifting](http://www.hse.gov.uk/construction/safetytopics/cranes.htm#supervision)

[Thorough examination](http://www.hse.gov.uk/construction/safetytopics/cranes.htm#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](http://www.hse.gov.uk/electricity/electricequip.htm#suitable) for the work and way in which it is going to be used.
* Check that the [electrical equipment is in good condition](http://www.hse.gov.uk/electricity/electricequip.htm#condition).
* Check that the [equipment is suitable for the electrical supply](http://www.hse.gov.uk/electricity/electricequip.htm#supply) with which it is going to be used, and the [electrical supply is safe.](http://www.hse.gov.uk/electricity/electricequip.htm#supply)
* It is often beneficial to use a [Residual Current Device (RCD)](http://www.hse.gov.uk/electricity/electricequip.htm#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](http://www.hse.gov.uk/construction/safetytopics/excavators.htm#excavator)
* [Controlling the risk](http://www.hse.gov.uk/construction/safetytopics/excavators.htm#controlling)
* [Training and competence](http://www.hse.gov.uk/construction/safetytopics/excavators.htm#training)
* [Inspection and maintenance](http://www.hse.gov.uk/construction/safetytopics/excavators.htm#inspection)

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

A picture containing outdoor, tree, plant, house

Description automatically generated

A picture containing outdoor, plant, tree, house

Description automatically generated

A picture containing house, outdoor, building, grass

Description automatically generated

A picture containing outdoor, sky, cloud, grass

Description automatically generated

A shower curtain in a bathroom

Description automatically generated with medium confidenceA picture containing building, plant, outdoor, brickwork

Description automatically generatedA picture containing outdoor, grass, plant, building

Description automatically generatedA picture containing outdoor, grass, sky, cloud

Description automatically generated

1. <https://stats.gov.lc/wp-content/uploads/2019/01/Summary-Report-Saint-Lucia-2016-National-Report-of-Living-Conditions_December-2018.pdf> [↑](#footnote-ref-1)
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. [↑](#footnote-ref-2)
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). [↑](#footnote-ref-3)