

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR THE RENOVATION OF THE BABONNEAU WELLNESS CENTRE

For the Preparation of Design, Bidding Documents Supervision and
BOQs for the renovation of the Babonneau Wellness Centre

PREPARED FOR

Executed By:



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

Financed By:



THE WORLD BANK
IBRD • IDA

International Bank for Reconstruction &
Development

CONTENTS

Contents.....	i
ACRONYMS AND ABBREVIATIONS	ii
1 Introduction and Background	1
2 Project Description.....	2
2.1 Project Scope and Context	2
2.2 Project Details.....	3
3 Site Specific Environmental and Social Impacts.....	7
4 Legal and Administrative Framework	7
5 Social and Environmental Safeguards.....	9
6 Potential Environmental and Social Impacts and Mitigation Measures.....	- 11 -
7 Project Management and Institutional Arrangements.....	- 25 -
7.1 ESMP Implementation	- 25 -
7.2 Supervision, Monitoring and Reporting.....	- 26 -
7.2.1 Supervision - Construction Phase	- 26 -
7.2.2 Monitoring	- 27 -
7.2.3 Reporting.....	- 35 -
8. Stakeholder Engagement.....	- 35 -
8.1 Publication of the ESMP.....	- 35 -
8.2 Community Engagement	- 35 -
9. Grievance Redress Mechanism.....	- 39 -
10. Costs For ESMP Implementation	- 46 -
11. Conclusion.....	- 46 -
12. Appendices.....	- 47 -
Appendix A– Incident / Accidents to be reported to the World Bank.....	- 47 -
Appendix B - Code of Conduct for Contractor’s Personnel (ES) Form	- 49 -
Appendix C Project Environmental and Social Safeguards Inspection Weekly Checklist	- 53 -
Appendix D Monthly Employer’s Environmental and Social Safeguards Review Checklist.....	- 60 -
Appendix E: E&S Quarterly Report Template	- 63 -
Appendix F: Grievance Redress Reporting Forms.....	64
Appendix G: Site Photos.....	55
Appendix H: Saint Lucia SMART Health Facilities Checklist	57

ACRONYMS AND ABBREVIATIONS

BOQ	Bill of Quantities
CARPHA	Caribbean Public Health Agency
CFP	Chance Finds Procedure
CoC	Code of Conduct
C-ESMP	Contractor's Environmental and Social Management Plan
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
HSSP	Health System Strengthening Project
HIS	Health and Safety Index
MoHWEA	Ministry of Health Wellness and Elderly Affairs
MOE	Ministry of Equity
MSIP	Management Strategy and Implementation Plan
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

The Health System Strengthening Project (HSSP) is one of the most recent initiatives forged out of a partnership with the Government of Saint Lucia and the World Bank Group. The aim of the project is to improve the accessibility, efficiency, and responsiveness of healthcare delivery in Saint Lucia to its population. Improvement of the island's healthcare sector has been a long-standing priority for the Government of Saint Lucia (GoSL), however the high prevalence of non-communicable diseases coupled with the continuing threat of highly infectious diseases such as Coronavirus (COVID-19) and dengue have highlighted the demand for a heightened momentum to this commitment.

Within the HSSP there is a focus on four (4) major components which are as follows: Design and Implementation of an Essential Package of Health Services (EPHS); Strengthening of the Health sector's service delivery in support of the essential Package of Health Services (EPHS); Institutional Capacity building, Project Management and Coordination; and Contingent Emergency Response Component (CERC).

The first phase of HSSP implementation comprises the component of the Design and Implementation of the Essential Package of Health Services.

The aim of the second component is to strengthen the healthcare service delivery in support of the Essential Package of Health Services. The improvement of healthcare service delivery will be facilitated by the implementation of a Performance-Based Financing (PBF) system, the strengthening of the supply of healthcare services, and the improvement of public health emergency preparedness and response. To further execute the second component, steps will be taken to strengthen the supply of services at the primary health facilities and build capacity of the staff within the Department of Health and Wellness. The HSSP will support the Ministry of Health & Wellness (MoHW) in identifying and addressing gaps in service provision inclusive of infrastructure, equipment, supplies and training of the healthcare sector workers and health facilities to ensure the necessary conditions and skills to provide the services.

The HSSP is managed by a stand-alone Project Implementation Unit (PIU), located within the Ministry of Health and Wellness. The PIU is responsible for the execution of the project components which includes oversight of refurbishment projects, compliance with local safeguards and local permit requirements during refurbishments/rehabilitations.

The HSSP will be financed under Component 2, Strengthening of the Health sector's service delivery in support of the essential Package of Health Services (EPHS). The environmental and social impacts related to these renovation works are expected to be minor, temporary, localized and readily managed by industry standard and typical mitigation measures. Negative impacts expected during renovation are related to: air pollution caused by dust generated from cleaning of the old walls; noise; construction traffic movements; pollution from construction waste; working in confined spaces at height, and with electrical circuits. Reflecting the nature and small scale of the proposed renovation work under the project, this Environmental and Social Codes of Practice (ESCoPs) describes the mitigation measures to be applied by the contractor to ensure that the environmental, social and health and safety risks are minimized. The mitigation measures are identified by reference to the General Conditions of Contract (GCC) of the World Bank's Small Works Standard Procurement Document that will be used to procure the Contractor undertaking the works. Where necessary, the ESCOP identifies E&S Specifications that are to be added to

the procurement document to supplement the GCC, and ESCOPs that set out the detailed actions that the Works Contractor must undertake to deliver works to the agreed standard.

2 PROJECT DESCRIPTION

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

2.1 PROJECT SCOPE AND CONTEXT

Babonneau is an inland community in the quarter of Castries. Generally, Babonneau is considered to be the commercial and institutional centre for many of the surrounding communities including Talvern, Hill 20, Fond Canie, Girard, Garrand, Boguis and Des Barras. Based on the 2010 census Babonneau (listed as Babonneau proper) has a population of 916.

Community	Population (2010)
Babonneau (proper)	916
Talvern	524
Hill 20	341
Fond Canie	93
Girard	627
Garrand	859
Boguis	147
Des Barras	243
TOTAL	3,750

If neighbouring communities are considered, the population of the area is approximately 3,750. It should be noted that this area is served by two other Wellness Centres, located in La Guerre and Fond Assau, both of which will be renovated under the OECS Regional Health Project.

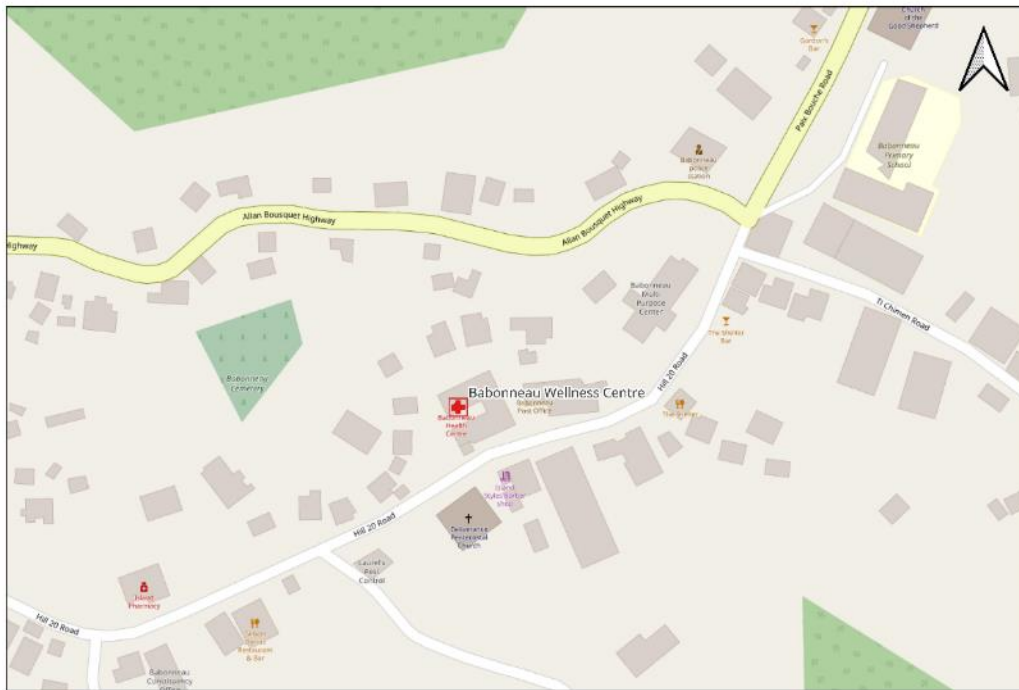


Figure 1 Location of Babonneau Wellness Centre

The Babonneau Wellness Centre is centrally located in Babonneau and can be considered the most accessible of the three wellness centres in Babonneau based on its location. As previously stated, the other wellness centres in the area are situated in La Guerre and Fond Assau.

The Babonneau Wellness Centre is approximately 1.8 km from the Fond Assau Wellness Centre and 2.9 km from the La Guerre wellness Centre.

The project entails the implementation of upgrades to improve the functionality of the clinic, improve its structural soundness and make it a greener facility, by improving its energy efficiency.

2.2 PROJECT DETAILS

The rehabilitation of the Babonneau Wellness Centre includes:

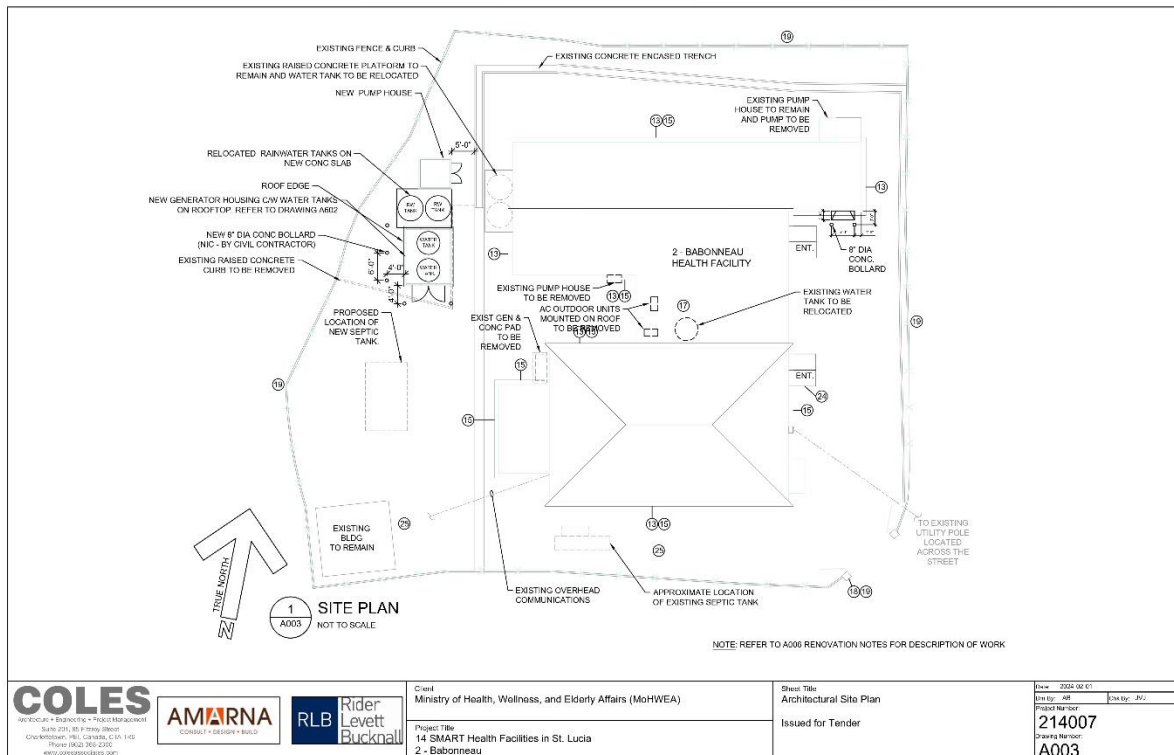
- 1) Repair and repainting of roof fascia boards, soffit, exposed rafters and guttering (as needed) to enhance the structural integrity of the roof
- 2) Repaint and repair walls (interior and exterior). Durable latex flat and latex eggshell paints will be applied to ceilings and walls respectively.
- 3) Installation of new signage to include room names and numbers. This is expected to allow both staff and patients to navigate through the facility more easily
- 4) Repair of the existing fencing of the Wellness Centre compound to enhance site security and control access to the compound.
- 5) Replacement of floor tiles with porcelain tiles to enhance the durability of the floor finish, including preparation of the sub-floor to receive new tiles. Porcelain tiles are more durable and easier to maintain

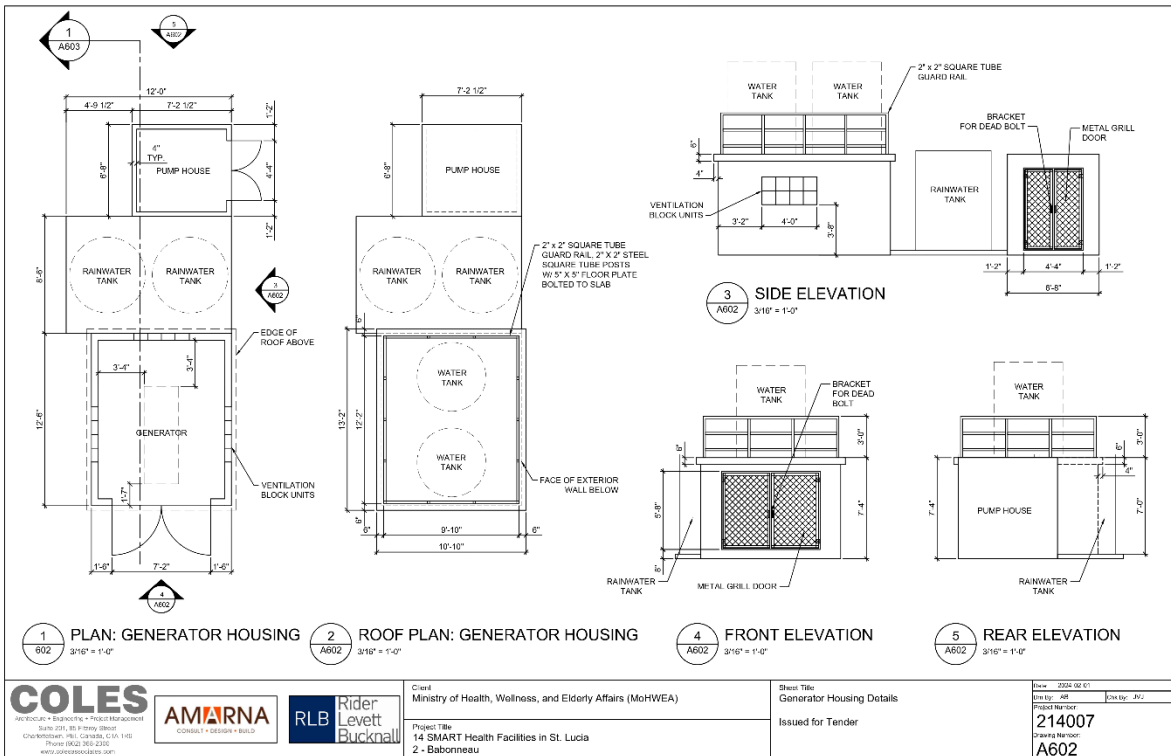
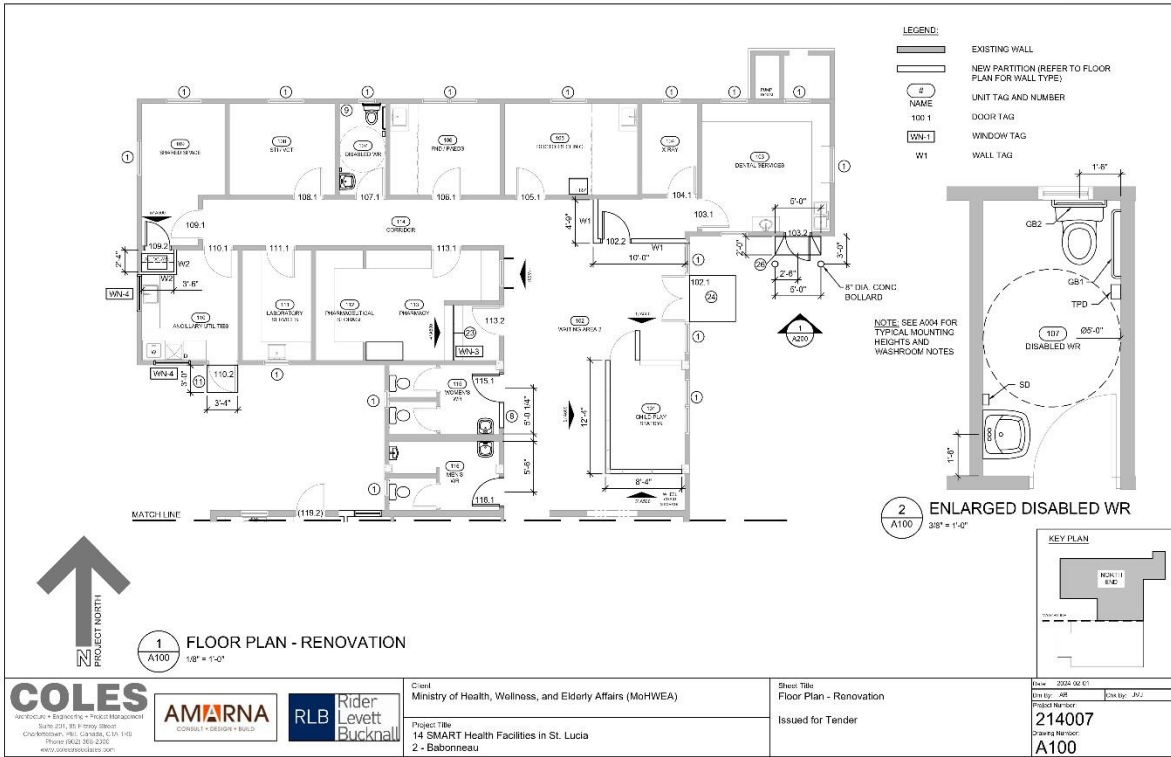
- 6) Construction of new housing for the standby generator with water tanks installed on roof. The standby generator will be a 35-kW diesel generator supplied under another initiative. This diesel generator will need to be tested regularly by maintenance personnel to confirm its functionality during power outages. Based on the typical energy consumption of the facility, it is expected that the generator will be able to keep the Babonneau clinic online for 48 hours of continuous operation at 75% building load Hours, from the day tank. The generator's supplier will provide a 5-year warranty and one year of maintenance.
- 7) Installation of new interior and exterior doors and windows and installation of shatterproof film on all exterior windows. The film application will increase the tensile and break strength of existing windows and make them more resistant to shattering during storm events or from other impacts. The new windows and doors shall comply with Miami-Dade risk category guidelines for Risk Category 1, meaning that they should withstand gusts of 156-165 mph¹.
- 8) Rewiring of the electrical and telecommunication systems in the building, including the installation of energy-efficient LED luminaires, fire alarm, emergency signage, and data outlets. Emergency and exit signage will be LED and will be wired with both normal and emergency power connections. The battery power for the emergency connection allowing them to work for 30 minutes after an outage. The fire alarm will also be functional during power outages.
- 9) Reconfiguration of internal partitions to improve functionality including the demolition of existing partitions and installation of new partitions, creating dedicated electrical and server rooms and improving accessibility for persons with disabilities
- 10) Improvements to HVAC including the installation of new split AC units, ceiling fans and wall fans which will be sized and positioned for optimal air circulation and cooling efficacy.
- 11) Replacement of bathroom fixtures with new water efficient fixtures

¹ <https://www.floridabuilding.org/fbc/publications/fbc.pdf>



Figure 2 Aerial photo of the Site





3 SITE SPECIFIC ENVIRONMENTAL AND SOCIAL IMPACTS

Environmental and Social Impacts can generally be classified in a number of ways including:

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

The potential negative impacts of this activity are expected to be primarily the nuisance of increased noise, dust, and traffic on the community combined with the disruption of the healthcare services usually available to the community during the construction phase. Improper waste management can also become an issue. Environmental and social impacts are detailed in section 6, along with recommended mitigation measures.

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 odours. These risks will be mitigated through the design of works to be undertaken, construction worker training and site management procedures. In the event of an onsite incident, investigation and 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. Influx of workers to the community, if required, may present issues that can be managed by the application of Codes of Conduct. Environmental and social impacts are detailed in section 6, along with recommended mitigation measures.

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.

4 LEGAL AND ADMINISTRATIVE FRAMEWORK

Table 1 below, extracted from the Environmental and Social Management Framework (ESMF) shows the local legislation and World Bank policy that relate to each of the environmental and social issues.

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

Additionally, Approval from the Development Control Authority (DCA) is required for renovation and construction works. The Guide to Obtaining Permission to Develop Land from the Physical Planning Section, which is the implementation agency for the DCA lists the following requirements for renovations.

- Letter of Intent
- One (1) copy of Location Map (topographic and LRTP map extract) with parcel clearly identified - to be obtained from the Survey and Mapping Section
- One (1) recent copy of Land Register – to be obtained from the Land Registry Section
- Notarized letter of permission from land owner(s) if applicable
- Elevations (if required)
- Details (if required)
- Engineering certification/report (where applicable)
- Architectural impressions of proposal, certified by a locally registered Architect (where applicable)

- Recommendations from Fire Department (where applicable)
- Recommendations from Public Health Department (where applicable as per Health Department Regulations)
- Electrical Certification (where applicable)
- Site Management Plan with hoarding details certified by an Engineer (where applicable)
- Permission from District Council to hoard the sidewalk (where applicable)
- Traffic Management Plan (where applicable)

5 SOCIAL AND ENVIRONMENTAL SAFEGUARDS

An environmental and social management plan is recommended for the project, to ensure that the projects are conducted responsibly, to minimise their impact on the environment and communities, and to achieve long-term sustainability goals. The plans are developed to:

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

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

The World Bank Group (WBG) has developed Safeguards Policies that guide the development of projects including the Regional OECS Regional Health Project.

Most relevant to the Babonneau clinic rehabilitation is the Operational Policy 4.01 (OP 4.01), which requires environmental and social assessment of any proposed project. Accordingly, the ESMF was prepared as a general guidance document and to describe the process for screening works to determine whether they can be taken forward under the project and whether an ESMP or ESHSCOPs is needed. Following this process, this Environmental and Social Management Plan (ESMP) has been prepared for the specific activity of the health centre renovation, and describes how the E&S risks will be managed throughout the design, construction and operation of the upgraded health centre.

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

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

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

The 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 6.0 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.²

Of relevance to the rehabilitation are the sector-specific WBG guidelines for Healthcare Facilities,³ 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.

The requirements of the EHS Guidelines, which focus primarily on Waste Disposal, Occupational Health and Safety and Community Health Considerations with respect to Healthcare Facilities are addressed in more detail in Section 6.

² <https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

³ <https://documents1.worldbank.org/curated/en/118311496115696454/pdf/115328-WP-ENGLISH-Health-Care-Facilities-PUBLIC.pdf>

6 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

The following table (Table 6.1) represent a detailed, site-specific assessment of each of the risks and impacts, the mitigation measures, and the supporting GCCs/PCCs. Operational impacts and mitigation measure are provided in Section 6.2

Mitigation measures are presented for preventing or minimizing the identified impacts.

6.1 CONSTRUCTION PHASE

	Potential Environmental and Social Impact	Environmental and Social Risk	Assessment	Required Mitigation	Relevant GCC / PCC
Flora and Fauna	None	None	The Babonneau Wellness Centre facility already exists and is only being renovated.	No mitigation is required onsite	
Soil, Groundwater and Surface Water Resources	Soil and Groundwater -Low Surface Water Low	Low	The Facility is not near to or upstream of any known water abstraction point	<ul style="list-style-type: none"> - The Contractor shall ensure that construction materials including aggregates, and chemicals such as paints, solvents, and stains are properly stored on site and disposed of. - The contractor shall take steps to ensure that stormwater runoff protection measures such as silt fencing, straw bales, sediment ponds or pits, etc. to ensure that sediment does not leave the site and impact any drains, rivers, or water bodies. 	- GCC 18.3 covers this requirement
Environmental damage caused by the workforce	Damage to the environment -- Low	Low	The Contractor may neither follow nor enforce the Code of Conduct (CoC) if his/her employees are in breach.	The Contractor shall 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	GCC18.3 – Protection of the environment The COC in section IV (bidding Forms) will apply.

			<p>The contractor may not provide relevant training to the workforce.</p>	<p>arising as a consequence of his methods of operation, including the following:</p> <ul style="list-style-type: none"> - Signing and enforcing the CoC. - Training workers on environmental issues and measures to be taken in the event that actions to protect the environment are necessitated, - Designating an employee to supervise and ensure environmental obligations are complied with. - Incorporating environmental and social issues into the agenda of regular meetings with workers. - 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. 	<p>GCC18.3 – Protection of the environment</p> <p>The COC in section IV (bidding Forms) will apply.</p> <p>Appendix B and GCC 28 are relevant to the CoC as well as GCC 18.1, 18.2, 9.4.2, 30.3, and 30.4.</p> <p>A specification will be added to require the contractor to provide as a minimum the General Induction for Construction Workers with reference to GCC 9.4.20, as follows:</p> <p><i>In addition to GCC 9.4.20, as a minimum the general induction: General Induction for Construction Workers: Safety, Health and the Environment to be found here, https://www.wbgkggtf.org/node/3823 shall be provided as training to all Contractor’s Personnel. Each Contractor’s Personnel shall receive the general induction prior to their start of any Works activity on site, and at least annually thereafter.</i></p> <p><i>Records of the general induction training provided shall be kept. The record shall include a copy of the induction given and as a minimum the following details:</i></p> <ul style="list-style-type: none"> • <i>Name and signature (or mark) of trainee</i>
--	--	--	---	--	---

					<ul style="list-style-type: none"> • <i>Employer/ organization they work for</i> • <i>Date of induction training attended</i> <p>Inspection, supervision and enforcement will be done as per GCC 8.2, 9.2, 22.1 and 33.1.</p>
Interruption of Healthcare Service during Renovation	Moderate to Significant	Moderate	<p>Renovation is expected to be completed in 5 months. During this period residents of Babonneau and nearby communities will be required to obtain medical services at nearby facilities, which would be the Fond Assau Wellness Centre. Residents of Babonneau would be temporarily unable to walk to the clinic to receive services. The impact will be additional time taken to get to and from alternative clinics in neighbouring communities as well as additional travel costs, thus increasing the cost of accessing healthcare for the renovation period.</p> <p>This also means that the clinic will be unavailable to serve residents requiring urgent medical attention during construction.</p>	<ul style="list-style-type: none"> - Implement an effective communication strategy to inform the public of the dates of closure and where healthcare services can be obtained during the closure. - Assist members of the public with offsetting the cost of transportation to Fond Assau for clinical services through the provision of a shuttle service or another suitable arrangement. 	<p><i>The PIU will undertake the communication with the public and provide the shuttle service.</i></p> <p><i>The Contractor shall be required (through the specification) to display a notice at the entrance to the site informing the public of where and when transport can be obtained to the new location, and will be required to inform clients who visit the centre of the transportation arrangements for travelling to alternate Centres.</i></p> <p><i>The PIU will arrange logistics for the shuttle buses.</i></p>

			Residents who cannot afford to travel to alternative health facilities may delay accessing medical checkups resulting in higher morbidity and comorbidity rates.		
Air Quality degradation from dust and emissions	Low-Moderate	Low- Moderate	Air quality in the community may be adversely affected particularly during external construction and demolition works and potentially due to the transportation of materials to and from the site.	The Contractor shall ensure that: <ul style="list-style-type: none"> - Vehicles transporting material to and from the site shall 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 less than 1km away in Babonneau. - Aggregates stored on-site should be covered. Noxious chemical fumes are not envisaged based on the scope of work. 	<i>Further to GCC 18.3 (b), a specification shall be included to require contractors to fit sheets over trucks transporting materials to and from the site, to prevent spillage on the public roads.</i> <i>In addition, a specification shall be included to require the contractor to cover all materials stored on site, so that they do not create dust nuisance</i>
Noise Pollution	Moderate	Moderate	Babonneau is a rural residential area with a few small businesses and institutional buildings near to the Wellness Centre including the Roman Catholic Church, Post Office, Primary School and a preschool. Truck trips to and from the site, the use of power tools and other noise related to	The Contractor will ensure that: <ul style="list-style-type: none"> - Trucks and heavy-duty equipment shall 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 	. <i>GCC 18.3 Protection of the environment</i> <i>(a) The Contractor shall take all necessary measures to: protect the environment (both on and off the Site); and</i> <i>(b) limit damage and nuisance to people and property resulting from pollution, noise and other results of the</i>

			construction will create some noise pollution.	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.	<i>Contractor's operations and/ or activities.</i>
Traffic Management	Moderate	Significant	<p>The road in this area generally has a fairly low traffic volume. The additional traffic associated with construction could reduce the safety of the road and exacerbate traffic congestion issues.</p> <p>Heavy-duty vehicles also pose a safety risk to pedestrians and other motorists in the community.</p> <p>Vehicles can also pose a hazard to personnel on the site, particularly from trucks reversing onto the site to deliver materials or pick up debris and waste.</p>	<p>The Contractor will prepare a detailed traffic management plan shall be developed to address traffic management, onsite and within Etangs, and environs. The plan shall achieve the following goals:</p> <ul style="list-style-type: none"> - Reduce interactions between vehicles and pedestrians - Minimise the number of vehicle movements in and around the site - Ensure that all personnel on site are trained and practice traffic safety guidelines - Reducing the need for vehicles to reverse wherever possible as reversing onsite can lead to fatal accidents - No parking or stockpiling of materials will be allowed along the public roadway. No materials shall be stored so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public or result in siltation or blockage of drains. 	<p><i>GCC 9.3 sets out the requirement for the contractor to put in place everything necessary for safe use of roads.</i></p> <p><i>During preparation of the bid documents, a Specification will be prepared to require the contractor to submit a Traffic Management Plan and access management plan for the approval of the Project Manager, incorporating all of the components listed in the previous column</i></p>

				<ul style="list-style-type: none"> - Contractor shall 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 Department of Transport and Royal St. Lucia Police Force (RSLPF). 	
Occupational Health and Public Health and Safety	Moderate	Moderate	Construction workers on site are exposed to construction-related hazards including exposure to dust, pollutants and potential injury from falling objects, use of hand and power tools, and potential risk of electrocution.	<p>The Contractor shall:</p> <ul style="list-style-type: none"> - Ensure that all staff are trained on safety best practices on a construction site. - Ensure that all persons entering the site have adequate PPE. - adopt and enforce a Health and Safety Policy and Plan. - provide induction training that meets the minimum standard set out in the KGGTF WBG 	<i>GCC 18.2 – sets out the safety requirements that the contractor will comply with. Additionally, a specification will be included to require the Contractor to prepare an MSIP presenting measures to handle specific risks associated with the performance of tasks.</i>

				Standard available at https://www.wbgkgtf.org/node/3823	<i>GCC 18.1, 9.4.2, 30.3 and 30.4 are applicable As per GCC 9.1 qualified personnel must be engaged.</i>
Exposure to VOCs	Low	Low	Painting and the use of chemicals with strong odours including paints, thinners, caulks, sealants and varnishes can have an adverse effect on the construction team and other persons traversing the site.	The Contractor will: <ul style="list-style-type: none"> - Ensure proper Use of PPE by employees - Schedule painting for periods when the facility will be closed - Use water-based paints where possible 	<i>GCC 18.2 – sets out the safety requirements that the contractor will comply with. GCC18.3 is also applicable</i>
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.	The Contractor will: <ul style="list-style-type: none"> - Install adequate hoarding to prevent the spread of debris and dust into the community. Provide temporary Work Areas for the storage of materials and demolished rubbish)	<i>GCC 18.2 – sets out the safety requirements that the contractor will comply with to enclose the site and safeguard the public.</i>
Fire Hazards	Moderate	Moderate	Demolition debris including timber and drywall as well as oil-based paints, solvents and other materials are flammable under certain conditions.	The Contractor will: <ul style="list-style-type: none"> - Ensure adequate training of all staff onsite on fire safety and how fires and explosions can be avoided as well as basic fire suppression techniques. - Provide fire suppression equipment such as a fire extinguisher. - Ensure that potentially flammable items are kept in cool locations away from heat, sparks or any potential igniter of the material. - Ensure that all debris, especially potentially flammable debris should be 	<i>GCC 18.2 covers this requirement.</i>

				removed from the site and disposed of as per guidance from SLSWMA.	
Slippage and Falling, Working at Heights	Low	Low – Moderate	Most of the construction work that will occur on this site will be at ground level. All structures on the site are also single-story structures. One of the onsite activities, demolition and reconstruction of a water tank pad and installation of new water tanks will require working at heights.	<p>The Contractor will:</p> <ul style="list-style-type: none"> - Ensure that all staff on site receive training on reducing the risk of slippage and falls. - Ensure that personnel wear appropriate PPE at all times. - Provide scaffolding and other protective measures and ensure that these are used to protect workers working at height. 	GCC 18.2 covers this requirement.

<p>Social Impact – Worker influx</p>	<p>Moderate</p>	<p>Low</p>	<p>The successful contractor is likely to bring some or all of his workforce from other communities in Saint Lucia.</p> <p>An influx of workers into the community compounded with the inconvenience caused by the project could lead to negative interactions with the community.</p> <p>Additionally, if onsite staff are not properly screened before they are hired, the influx of staff could expose the community to dangerous individuals.</p> <p>An influx of workers can place additional pressure on a community including, the transportation system, water supply, sanitation system etc. This impact is expected to be minor and it is expected that the community will benefit from additional economic activity from providing meals and other amenities to the workers.</p>	<ul style="list-style-type: none"> - Contractors will seek to employ skilled workers from the Babonneau and surrounding communities as much as possible. - All persons recruited should be vetted by ensuring that they provide a recent police certificate of character. 	<p>GCC 9.4.1 covers this requirement.</p>
<p>Community Conflict and Grievances</p>	<p>Low</p>	<p>Low</p>	<p>Residents may be dissatisfied if the contractor employs mainly workers from outside the community, this may result in conflict between the employees and the residents.</p>	<p>The Contractor will:</p> <ul style="list-style-type: none"> - Report any conflict between the onsite personnel and members of the public to the PIU and the relevant authorities. 	<ul style="list-style-type: none"> - <i>9.4.20 Training of Contractor's Personnel.</i> <p>GCC 9.4.19 covers this requirement.</p>

				<ul style="list-style-type: none"> - The Contractor will assign responsibility for dealing with complaints from the general public to the site foreman or supervisor. Reports will also be accepted during consultations with stakeholders and the wider public. - The Contractor shall establish a Grievance Redress Mechanism (GRM) for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details. - The contractor shall take appropriate measures to ensure that the site is well-secured in order to protect assets on site. - The Contractor shall maintain a CoC for all personnel, including the sub-contractors for site activities (GCC 9.4.20). The CoC shall 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 shall prohibit all forms of sexual exploitation and abuse and sexual harassment (SEA/SH). <i>A template of the CoC is in Appendix B.</i> - The GRM will have a channel for the uptake of grievances related to SEA/SH and gender-based violence (GBV). 	<p>GCC 26 is also applicable.</p>
--	--	--	--	---	-----------------------------------

				<ul style="list-style-type: none"> - The GRM shall be promoted through ongoing community outreach and consultation - The PIU will ensure that there is adequate stakeholder consultation. - 	
Exposure to Biological hazard	Moderate	Moderate	<p>Onsite staff may encounter medical waste during renovation.</p> <p>Staff may also encounter other workers onsite who may present with infectious diseases including those of a respiratory nature.</p>	<ul style="list-style-type: none"> - The contractor will provide employees with adequate PPE and training for interactions with medical waste and other hazardous materials. - The Contractor must ensure that 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. 	<i>GCC 18.2 covers this requirement, however a specification will be included requiring that the contractor provides the appropriate PPE such as hazmat suits, and masks for carrying out any task which involves hazardous wastes.</i>
Security	Low	Low	<p>Unauthorised persons may attempt to enter the site, placing themselves and others at risk.</p>	<ul style="list-style-type: none"> - The Contractor will conduct a security risk assessment of the site and put in place measures to protect property and personnel on the site. - The Contractor will ensure that unauthorised persons are kept off the site. - The Contractor shall submit for the Project Manager's No-objection a security management plan that sets out the security arrangements for the Site. - The Contractor shall (i) conduct appropriate background checks on any 	<ul style="list-style-type: none"> - GCC29 and 18 (a) provide guidance on keeping the site safe and protecting persons and property on the site.

				<p>personnel retained to provide security; (ii) train the security personnel adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct towards Contractor's Personnel, Employer's Personnel and affected communities; and (iii) require the security personnel to act within the applicable Laws and any requirements set out in the Specification.</p>	
Chance Finds	Low	Low	Excavations may result in the unearthing and damage to historical or archaeological heritage.	<ul style="list-style-type: none"> - The Contractor will provide training on the Chance Find Procedure to personnel - The Contractor shall not damage archaeological sites, protected areas and cultural heritage. - If items of cultural or historical significance are unearthed or discovered, works must stop immediately, and the Supervision team must be informed. The Contractor will also notify the National Trust Department and other relevant agencies upon encountering any artefacts, remains or other notable objects immediately. - The Contractor shall follow the Chance Find Procedures and ensure that training is provided to all project workers on the Chance Find Procedures. - If human remains are unearthed, work must stop immediately and the 	GCC 19 provides guidance by listing items of historical or archaeological value that may be unearthed and presents the steps or procedures that the Contractor must follow in the event of a Chance Find.

				<p>Contractor must notify the Supervising Consultant who will inform the PIU.</p> <ul style="list-style-type: none"> - The PIU will report the finding to the Police and the site will remain closed until an investigation is conducted and the all clear is given to resume work. - - 	
--	--	--	--	--	--

6.2 OPERATIONAL PHASE

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
Operational Phase	Low	Low	<p>The smarting of the facility will result in no or little additional pressure on the maintenance and medical staff. The retrofit of the Etangs Wellness Centre should also reduce the overall cost and complexity of maintenance required. For example:</p> <ol style="list-style-type: none"> 1) Porcelain tile flooring will be more durable 2) Latex and eggshell paint will require less frequent repainting 	<ul style="list-style-type: none"> - Training of relevant staff in commissioning, testing, and operations of any new equipment prior to the opening. - Establishment of a clear schedule for maintenance of the Wellness centre and the equipment and systems within it. <p>Maintenance of systems including the standby generator, water pump, A/C Units,</p>

	Potential Environmental and Social Impact	Environmental and Social Risk	Comment	Proposed Mitigation
			<p>3) Improved HVAC design will lead to less mould and air quality issues, leading to less frequent closures for mould remediation</p> <p>4) The improved electrical system and the standby generator will allow for better continuity of operations</p> <p>5) Water efficiency improvements as well as the addition of water storage capacity will improve the availability of potable and running water, improving continuity of operations following interruptions to the municipal water supply.</p>	<p>Fans, Fire alarm, and emergency lighting should be inspected, maintained and tested as per the manufacturer's specifications. Generally all systems should be inspected and tested at least once per year.</p> <ul style="list-style-type: none"> - MOHWEA should monitor the validity of installer and manufacturer's warranties on newly installed equipment - MOHWEA should allocate an appropriate budget for testing, servicing and repairing the infrastructure and equipment.

7 PROJECT MANAGEMENT AND INSTITUTIONAL ARRANGEMENTS

7.1 ESMP IMPLEMENTATION

The Ministry of Health, Wellness and Elderly Affairs will have overall responsibility for the implementation of the works. The Environmental & Social Specialist from the PIU will be supported by the design and construction management firm (the Supervision Consultant) which 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:

- Ultimately ensuring proper management of the environmental and social risks and impacts by ensuring that the Supervising Consultant is providing adequate oversight and reporting on ESHS issues.
- Engagement with project-affected peoples and other stakeholders, monitoring and ex-post evaluations.
- Evaluate the monitoring and supervision of project activities.
- Publicising the Grievance Redress Mechanism and Grievance Redress Management.
- Systematically documenting evidence of its activities and outcomes and providing information to the World Bank team as needed.
- Informing promptly the WB if incidents or accidents of the types listed in Appendix A occur.

The Supervising Consultant (SC) will be responsible for:

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

Contractor's Responsibilities

The Contractor will be responsible for complying with the ESHS provisions of the contract, including any subcontractor(s), to the satisfaction of the Supervising Consultant and PIU. The contractor prepares the OHSM and MSIPs to meet the requirements of the Contract, and Method Statements as required by the SC, to describe how they will deliver the ESHS requirements of the Contract, in terms of the tools, equipment and methods they will use. The following is a non-exhaustive list of potential ESHS issues that the contractor must address through this process:

- Permits and Approvals
- Site Security
- Terms and conditions of employment
- Establishing safe systems of work
- 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
- Training of workers, including induction training
- Adherence to the Code of Conduct and ensuring that employees sign and follow the Code of Conduct.

7.2 SUPERVISION, MONITORING AND REPORTING

7.2.1 Supervision - Construction Phase

Construction

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

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

The design supervision firm, assisted by the Supervision Consultant is required to review, implement and supervise the contract including the MSIPs, CESMP and Health and Safety requirements to ensure compliance, so as to mitigate environmental and social impacts, in accordance with this ESMP. As part of the supervision of works the design supervision firm shall also function as the ESHS Supervisor with responsibilities for overseeing the implementation of the C-ESMP and MSIPs in accordance with this ESMP.

7.2.2 Monitoring

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

There are two basic forms of environmental and social monitoring:

1. **Compliance monitoring**- which checks whether prescribed actions have been carried out, usually by means of inspection and/or enquiries; (and as described in section 7.2.1); and
2. **Effects monitoring**- which records the consequences of activities on one or more environmental or social components, and usually involves physical measurement of selected parameters or the execution of surveys, to establish the nature and extent of induced changes. As per the potential impacts and mitigation measures identified in Section 6, the environmental features/issues to be monitored will primarily consist of:
 - 1) Waste Management including
 - i. Wastewater disposal and treatment
 - ii. Solid Waste Management and disposal (including medical waste)
 - 2) Occupational Health and Safety
 - i. Compliance with safety guidelines and requirements onsite including use of protective equipment
 - ii. Compliance with site management plan, including proper hoarding where required
 - iii. compliance with traffic management plan
 - 3) Community Health
 - i. Observations of the presence of pollution (solid waste, liquid waste, noise, dust, fumes within the community as a result of construction activities)
 - ii. Observation of socio-economic impacts as a result of construction activities

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

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

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
Soil, Groundwater and Surface Water Resources	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&S Specialist and Project Engineer of the PIU.</p>	<p>Compliance with the required contractual environmental and social standards to prevent harm to the water resources.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Completed monitoring checklists. (Available in Appendix C &D)</p> <p>Reports from progress meetings</p> <p>E&S Semi-Annual Report (Template in Appendix E)</p> <p>Photos</p> <p>No of reports of complaints from residents or government agencies</p>
Environmental damage caused by the workforce	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&S Specialist and Project Engineer of the PIU.</p>	<p>Compliance with the required contractual environmental and social standards to mitigate damage to the environment.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Completed monitoring checklists. (Available in Appendix C &D)</p> <p>Reports from progress meetings</p> <p>E&S Semi-Annual Report (Template in Appendix E)</p> <p>Photos</p> <p>Reports of complaints from residents or government agencies.</p>
Interruption of Healthcare Service during Renovation	<p>Discussions with Wellness Centre clients and staff of the centre</p> <p>Records of client's visits</p>	<p>Wellness Centre Staff</p> <p>E&S Specialist</p> <p>PIU</p> <p>MoHWEA</p>	<p>Provision of shuttle services to alternate location(s)</p>	<p>Number of clients visiting the alternate centres for service.</p> <p>Number of complaints reported.</p> <p>E&S Semi-Annual Report (Template in Appendix E)</p>

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
Air Quality degradation from dust and emissions	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings.</p> <p>One-on-one discussions with residents in proximity to the site.</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&S Specialist and Project Engineer of the PIU</p>	<p>Compliance with the required contractual environmental and social standards to mitigate damage to the environment.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take corrective action.</p>	<p>Completed monitoring checklists. (Available in Appendix C &D)</p> <p>Reports from progress meetings</p> <p>Photos</p> <p>E&S Semi-Annual Report (Template in Appendix E)</p> <p>Reports of complaints from residents or government agencies.</p>
Noise Pollution	<p>Site visits</p> <p>Spot checks</p> <p>One-on-one discussions with residents in proximity to the site.</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&S Specialist and Project Engineer of the PIU</p>	<p>Compliance with the required contractual environmental and social standards to mitigate damage to the environment.</p> <p>In cases of non-compliance, issuing a stop order, and instructing the contractor to take utilize noise reduction measures.</p>	<p>Completed monitoring checklists. (Available in Appendix C &D)</p> <p>Reports from progress meetings</p> <p>Reports of complaints from residents.</p> <p>E&S Semi-Annual Report (Template in Appendix E)</p>
Traffic Management	<p>Site visits</p> <p>Spot checks</p> <p>Agenda item at progress meetings</p>	<p>Contractor</p> <p>Supervising Consultant,</p> <p>The E&S Specialist and Project Engineer of the PIU</p> <p>Officer in Charge of the Soufriere Police Station</p>	<p>Compliance with the approved traffic management plan.</p>	<p>Completed monitoring checklists. (Available in Appendix C &D)</p> <p>Reports of accidents</p> <p>Reports from the motoring public</p> <p>E&S Semi-Annual Report (Template in Appendix E)</p>

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

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

Potential Impact	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators
Slippage and Falling, Working at Heights	Site visits Spot checks Agenda item at progress meetings	Contractor Supervising Consultant, The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards. In cases of non-compliance, issuing a stop order.	Incident reports Completed monitoring checklists. (Available in Appendix C &D) Reports from progress meetings E&S Semi-Annual Report (Template in Appendix E)
Security	Site visits Spot checks Agenda item at progress meetings	Contractor Supervising Consultant, The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards.	Incident reports Completed monitoring checklists. Reports from progress meetings
Chance Finds	Agenda item at progress meetings	Contractor Supervising Consultant, The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards specifically the Chance Finds Procedures.	Reports from progress meetings Reports of Chance Finds E&S Semi-Annual Report (Template in Appendix E)
Social Impact – Worker influx	Spot checks Agenda item at progress meetings Monitoring the GM	Contractor Supervising Consultant, The E&S Specialist and Project Engineer of the PIU	Compliance with the required contractual environmental and social standards specifically the LMP.	Reports of worker grievances. Grievances from the public. E&S Semi-Annual Report (Template in Appendix E)

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

7.2.3 Reporting

The Supervision Consultant will prepare records of the site inspections and audits they have undertaken and prepare a monthly report describing the activities they have undertaken, what issues they identified (including areas where the works are not in compliance with contract requirements), what meetings, discussions and instructions have been provided to the Contractor with regard to correcting areas of ESHS non-compliance, and details of any remedies that have been applied for non-compliance with ESHS requirements. The report will also describe any informal discussions held with the residents of the community and whether/ how they are impacted by the ongoing works.

Monthly progress meetings should be convened with the PIU, the Supervision Consultant and Contractor in attendance. The monthly progress meetings shall include an agenda item which specifically covers environmental and social matters that discusses compliance with ESHS contractual requirements, and tracks the actions taken to bring the contract back into compliance (where necessary); as such the environment, social and health and safety specialists should be in attendance. 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.

8. STAKEHOLDER ENGAGEMENT

8.1 PUBLICATION OF THE ESMP

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

8.2 COMMUNITY ENGAGEMENT

Consultation with internal stakeholders is ongoing, and the stakeholders have been given the opportunity to review the designs and provide feedback.

The works, in particular the external works, would require community engagement. As such as a town hall meeting or a series of meetings is recommended as an effective means of communicating directly with the community and obtaining immediate feedback. The meeting will provide information on the relocation of services during construction, and any arrangements that may be made to assist clients with accessing services at the new location. This meeting should ideally be convened at least one month before the start of work.

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 can be held with project stakeholders and key community leaders to disseminate project information in a timely manner. These

engagements will be conducted in collaboration with the PIU. Table 8.2 below provides a guide on the method and frequency of engagement for various stakeholders.

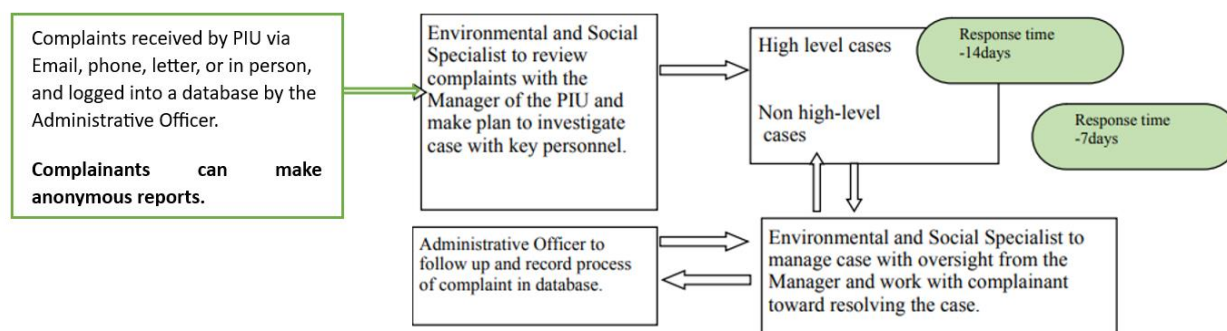
Table 8.2 : Stakeholder Engagement Schedule

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

	Reopening of SMART Centre	Correspondence	TBD
Staff of the Babonneau and Fond Assau Wellness Centre	Closure of the Babonneau Centre and the relocation of services to Fond Assau	Correspondence Meeting	At least one month before closure PIU
<u>External:</u>			
Parliamentary Representative	Contract signing	Correspondence	TBD PIU
	Closure of Centre	Correspondence	At least two weeks before closure PIU
Residents of Babonneau	Start of physical implementation and Closure of Centre	Announcements on radio, television and town crier Church Announcements Posters at the Centre prior to closure Project Signboard Community Meeting Social media including Facebook and WhatsApp The Government of St. Lucia Website Press releases to Television and radio stations and newspapers including online news papers Text blasts	At least two to three weeks before closure PIU Contractor Supervising Consultant
	Reopening of Centre	Announcements	TBD

9. GRIEVANCE REDRESS MECHANISM

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to the project-level grievance redress mechanisms (GRM) that is established and managed by the project. Templates of the Grievance Redress Reporting Form including for SEA/SH grievances, the Grievance Log and Grievance Closure Form can be accessed in Appendix F. Generally, a response will be provided to the complainant within 5 to 7 business days of receipt of the complaint for low-level complaints whereas more complex or higher-level complaints will be addressed within 14 days. The figure below shows illustrates the grievance redress process.



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

Grievance Redress Procedures

The table 9.0 below presents the steps to be followed should a grievance arise:

<p>Grievances from affected parties</p>	<ul style="list-style-type: none"> • Grievances made verbally to the E&S Specialist (ESS) in person at stakeholder engagement meetings or to the Contractor’s personnel. • Complainants can also make anonymous reports. • All GBV complaints will be handled directly by the ESS. • By email to the following address- mohgrievances@govt.lc • By Letter addressed to: <p style="margin-left: 40px;">The Permanent Secretary Grievance Redress Mechanism (GRM) <u>Attention to E&S Specialist HSSP & OECS Regional Health Projects</u> Department of Health and Wellness 2nd Floor, Sir Stanislaus Building, Waterfront, Castries</p>
---	---

	<ul style="list-style-type: none"> • By letter, addressed to 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 • Or call, text or WhatsApp to 286 7815
	<ul style="list-style-type: none"> • The PIU serves as the access point for grievances
Grievance Log	<ul style="list-style-type: none"> • Grievances received verbally are documented, verified and signed by both parties. • Grievances will be copied to the relevant authority
Assessment	<ul style="list-style-type: none"> • Grievances categorized by type. • Determination of eligibility of grievance. • The first assessment of the grievance is conducted by the PIU and technical officers from the pertinent Government authorities. • Letters acknowledging the grievance is issued by the PIU • The Social Transformation Officer (STO) for the region provides assistance with dealing with conflict resolution and grievance. • The ESS will communicate all disputes and grievances to the PIU immediately when received. Should a dispute arise, the applicable Laws of Saint Lucia will prevail.
Resolution and Follow-up	<ul style="list-style-type: none"> • Development of an Implementation Plan for resolution of grievances, including timeframes in which each step is completed as stated above in the section on processing grievances.

Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

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

The project’s E&S Specialist will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The GM should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor. A list of service providers is included in Table 5 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 approach⁴. 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

⁴ 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.

questioning)

- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

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

ACTION 2: INCIDENT REPORTING

The PIU E&S Specialist needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Project Manager who will in turn inform the World Bank Task Team Leader (TTL) or directly to the TTL. Complaint Forms and other detailed information should be filed in a safe location by the PIU Safeguards Specialist. Neither the PIU E&S specialist nor the Project Manager should seek additional information from the survivor.

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

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

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

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

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to the project⁵, the verification committee discusses appropriate actions to be recommended to the appropriate party i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents. For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

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

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

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

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

Grievance Redress Mechanism (GRM) for Labour

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

The GRM in the LMP also makes clear procedures for the handling of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) grievances. Complaints can be made in person, in writing, verbally over the

⁵ 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).

phone, by fax, email or any other media. Concerns can be raised anonymously and/or to a person other than an immediate supervisor.

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

Promoting GRM Awareness

The 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 to register grievances.

Table 9.0 - St. Lucia GBV Service Providers

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2 nd Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	slucps@gmail.com
Family Court	Case Management	Peynier Street, Castries	468-3308	familycourt.slu@gmail.com
Criminal Investigations Department	Case Management	Castries Vieux Fort	456-3770 456-3817 456-3926	
Vulnerable Persons Unit	Case Management Investigates sexual offences against minors, women and men.	Vulnerable Persons Team South North	456-3908 456-4050 4051 4052	
St. Lucia Against Human Trafficking	Provides human trafficking victims and survivors with access to critical support and	Ministry of Home Affairs, Justice and National Security 1 st Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	police@antitraffickingslu.org

Service Providers	Service Provided	Address	Telephone	Other
	services to get help and stay safe.			
Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	gender.relations@govt.lc
Abuse Hotline	Psychosocial Support		202	
St. Lucia Crisis Centre	Psychological Support Livelihood Support Assistance with basic needs such as food and shelter	107 Chausse Road, Castries	453-1521 712-7574	stluciacrisis@gmail.com
Women's Support Centre	Legal Aid Psychological Support Livelihood Support Assistance with basic needs such as food and shelter		458-4470	WSCCENTER2001@GMAIL.COM
Raise your Voice St. Lucia Inc	Psychological Support Livelihood Support	Manoel Street, Castries	726-0473 487-2329	raiseyourvoiceslu@gmail.com https://ryvslu.org/
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	info@prosafe.org https://prosaf.org
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	unitedandstrongstlucia@yahoo.com www.facebook.com/Unitedandstrongstlucia/
St. Lucia Planned Parenthood Association	Sex education counselling, Sexual and reproductive health services	52 John Compton Highway	452-4335 Hotline: 459-7933 Whatsapp 722-1234	slppa758@gmail.com
OKEU Hospital	Medical Health Services	Castries	458-6500	
St. Jude Hospital	Medical Health Services	Vieux Fort	454- 6041	

Service Providers	Service Provided	Address	Telephone	Other
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
Babonneau Wellness Centre	Medical Health Services	Babonneau		
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	

10. COSTS FOR ESMP IMPLEMENTATION

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

11. CONCLUSION

The Babonneau Wellness Centre Rehabilitation has low to moderate potential E&S impacts not requiring a full ESIA but requires an ESMP and proper Environmental and Social Monitoring and the implementation of mitigation measures. It will be important to ensure that the effects of construction on the wider community are mitigated. Coordination and communication with the community will be important to the successful completion of the project without incident, as well as coordination with other authorities and institutions including but not limited to RSLPF, Fire Service and Community Based organisations in Babonneau and environs.

12. APPENDICES

APPENDIX A— INCIDENT / ACCIDENTS TO BE REPORTED TO THE WORLD BANK

The following are incident types to be reported using the environmental and social incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected Impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

APPENDIX B - CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL (ES) FORM

Note to the Employer:

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

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

Delete this Box prior to issuance of the bidding documents.

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

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

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.

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 behaviour that we require from all Contractor's Personnel.

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

REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out their duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
 - b. wearing required personal protective equipment;
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to their life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, 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: Behaviours constituting Sexual Exploitation and Abuse (SEA) and behaviours 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 behaviours:

(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 favour.
- A Contractor's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) Examples of sexual harassment in a work context

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

APPENDIX C PROJECT ENVIRONMENTAL AND SOCIAL SAFEGUARDS INSPECTION WEEKLY CHECKLIST

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

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

Sub-Project Contract: _____

Construction Phase: _____

Contractor: _____

Recording Officer: _____

Designation of Recording Officer: _____

Date: _____

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

Environmental Issue to be considered in site inspection	YES	NO	N/A	If <u>YES</u> add an explanatory comment and mitigation measure
<p><i>Issue: Loss of soil through soil erosion</i></p> <ul style="list-style-type: none"> - Has any natural vegetation outside the working width of the construction work area been removed? - Are there any visible signs of soil erosion? - Are excavated areas properly maintained to prevent soil erosion? - If any sediment traps have been installed, have they become clogged and not functional? 				

<ul style="list-style-type: none"> - Are any soil retention/slope stabilisation measures required or being implemented? 				
<p>Issue: Soil Contamination</p> <ul style="list-style-type: none"> - Are there any signs of soil that has been contaminated due to spillage (Petrochemical, cleaning products)? 				
<p>Issue: Pollution of water courses/bodies/source through soil erosion, entry of liquid construction waste or chemicals or entry of solid construction waste into the water course/body</p> <ul style="list-style-type: none"> - Are there visible signs of increased sediment immediately downstream of construction works in any rivers, in the well or in the nearby marine environment within the project area? - Have there been any complaints from residents or third parties regarding pollution of water sources/courses/bodies? - Has any construction spoil been disposed of into or adjacent to a water source/course/body? - Are any construction related fuels and chemicals stored within 10m of a water source/course/body? - Has any fuel or chemical leaked during storage, transport to site, use on site or refuelling? - Has any construction related solid or liquid waste entered a water source/course/body within the general project area (including construction site office)? <p>Issue: Prevention of negative landscape and visual impacts.</p>				

<ul style="list-style-type: none"> - Have any construction compounds, materials dumps, or waste disposal sites in use not been discussed and agreed with the Supervising Officer (and, if necessary, appropriately licensed with the Government of St Vincent?)? - Are there any visible signs of scarring from excavation works that require restoration? 				
<p><i>Issue: Management and disposal of solid and liquid construction wastes.</i></p> <ul style="list-style-type: none"> - Has any construction related packaging (especially cement bags) been disposed of on the side of the road, in vacant land, along river embankments or in the river channel, or at any unofficial waste disposal site along the route? - Has any contaminated/hazardous material been found during construction? - Is any sub-contractor's waste being disposed of along the roadside or at an unlicensed waste disposal site along the route? - - Has any construction waste of any kind been dumped by the side of the road or along the river embankment? - Are any liquid wastes being discharged to water courses? - Has any liquid waste, liquid contaminant leaked unto the site, into any neighbouring lands or water source/course/body? - Is water discharge/pumping in progress? - Is there any Hazardous waste by products on site? 				
<p><i>Issue: Management of construction noise and vibration.</i></p>				

<ul style="list-style-type: none"> - Is any noisy stationary plant being operated adjacent to housing? (If so are they screened to reduce disturbance?) - Are any noisy activities taking place before 7:00 a.m. or after 5:00 p.m. between Monday to Friday? (If so has this working been discussed and agreed with the Supervising Engineer/Client?) - Have there been any noise or vibration related complaints during the last week? 				
<p>Issue: Dust nuisance prevention.</p> <ul style="list-style-type: none"> - Are there any houses adjacent to the construction sites being affected adversely by dust? - Are any crops adjacent to the construction works covered with dust? - Is there any quarry material stored on site that is uncovered or does not have hoarding and subject to dispersal by the wind? - Are any trucks, carrying quarry materials to or from the site, transporting this material uncovered? - Is adequate water available to damp down any dusty operations ongoing on site? - Have there been any dust related complaints during the last week? 				
<p>Issue: Air Pollution (Fumes)</p> <ul style="list-style-type: none"> - Are there any signs of high levels of exhaust/ fumes/ malodors? - Have there been any fumes nuisance related complaints during the last week? 				
<p>Issue: Dealing with archaeological finds.</p> <ul style="list-style-type: none"> - Have any potential historic artefacts been found during construction? (If so, note how these have been dealt with). 				

<p>Issue: Construction traffic management.</p> <ul style="list-style-type: none"> - Is there adequate signage to inform motorists of the construction activities ahead? - Have there been any complaints about construction traffic impacts (noise, dust, congestion)? - Is there a designated turning/ loading/ offloading area? (If so, is there adequate signage or are a traffic management system being implemented?) - Have there been any traffic accidents/incidents during the last week due to the construction activity on this site? (If so, state how many and severity) 				
<p>Issue: Dealing with hazardous substances.</p> <ul style="list-style-type: none"> - Have any: old drums or containers, oily sheen, materials with a strong smell or unusual colouration been exposed/damaged during construction excavations? - Are drums containing hazardous material properly stored and adequately labelled on the site? - Has there been any spillage during the last week? (If so, how many, what was spilled, how much and how was it managed?) 				
<p>Issue: Environmental Incidents and Corrective Actions.</p> <ul style="list-style-type: none"> - Have complaints been received from the public or other third party during the last week? (If so, how many? Attach a copy of the reports) - Has any incident leading to a threat of human health or life occurred during the last week? 				

(If so, how many? Describe severity and attach copy of incident report)				
---	--	--	--	--

Completed by:

Designation: Contractor's Representative

Signed

Print Name:

Date:

Designation: Client's Supervising Officer

Action completed:

Signed

Print Name:

Date:

ENVIRONMENTAL INSPECTION AND SOCIAL SAFEGUARDS REGISTER – ADDITIONAL COMMENTS

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

Continuation Sheet No. Pages:

APPENDIX D MONTHLY EMPLOYER’S ENVIRONMENTAL AND SOCIAL SAFEGUARDS REVIEW CHECKLIST

Month in Review: _____

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

Subproject: _____

Contractor: _____

Recording Officer: _____

Recording Officer Designation: _____

Date: _____

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

Issue to be considered in the review	Yes	No	Comments and detail of any corrective actions requested
<p>Q - Looking at the file is there evidence that the Contractor is undertaking the weekly Environmental Inspections and filing the completed Inspection Checklist?</p>			
<p>Q – Looking at the file and the completed weekly Environmental Inspection, has the Supervising Engineer signed the completed checklists?</p>			
<p>Q – Looking at the file is there evidence that the Contractor is maintaining the log of environmental incidents/complaints? <u>(It is possible that there may be very few or no complaints of this project so this form may in reality not be used. If there are no</u></p>			

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?			

<p align="center">MONTHLY EMPLOYER’S ENVIRONMENTAL AND SOCIAL SAFEGUARDS REGISTER REVIEW – ADDITIONAL COMMENTS</p> <p align="center"><i>If required, provide supporting comments relating to specific points above.</i></p>	
	<p align="right">Continuation Sheet No. Pages:</p>

Review completed by:

Designation: Employer’s Representative

Signed

Print Name:

Date:

Designation: Contractor’s Representative

Signed

Print Name:

Date:

APPENDIX E: E&S SEMI-ANNUAL REPORT TEMPLATE

Environmental and Social Semi-Annual Report
[Date]

- A. Summary
- B. Sub-projects and Program Activities
- C. Context

PROJECT Activity	STATUS	ADVANCES & CHALLENGES	NEXT STEPS

- D. Environmental Management Actions Items
- E. Status of the Grievance Redress Mechanism
- F. Conclusions and Recommendations

Complaints Form Template

CONFIDENTIAL COMPLAINTS FORM

**DO NOT FILL IN IF SEA/SH SURVIVOR
DOES NOT CONSENT**

**OECS Regional Health Project and Saint
Lucia Health System Strengthening
Project**

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

Program

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

- OECS Regional Health Project (explain project activities briefly)
- Saint Lucia Health System Strengthening Project (explain project activities briefly)
- Other

Details of Complaint

- 2. Today's date: Day _____ Month _____ Year _____
- 3. Parish: _____
- 4. Sex of person complaining (M/F): _____
- 5. Age of person complaining: _____

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

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

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

6. First Name: _____ 7. Last Name: _____

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

8. Parish: _____ 9. Mobile number: _____

10. Mediator for affected person: _____

11. Civil organization / Service Organization: _____



Receipt:

Complaint Number: [Same number as above]

Date received: _____

Person receiving the complaint: _____

Grievance Registers

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

Page Number: [Number]

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

FILL IN ONLY FOR SEA/SH INCIDENTS

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

Meeting Record Format

Subproject: Community: Location:

Date of the Meeting: Complaint Register No:

Venue of meeting:

Details of Participants:

Complainant	Project/Government

Summary of Grievance:

.....

..... Notes
on Discussion:

.....

.....

.....

Decisions taken / Recommendations:

.....

.....

.....

Issue Solved / Unsolved _____

Signature of Chairperson of the meeting:

Name of Chairperson: Signature :.....

Date: (DD/MM/YYYY)

Grievance Closure Form

Subproject: Community:..... Location:

Result of Grievance Redressal

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

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

Name:.....

National ID number:

Signature of Permanent Secretary or Project Manager:

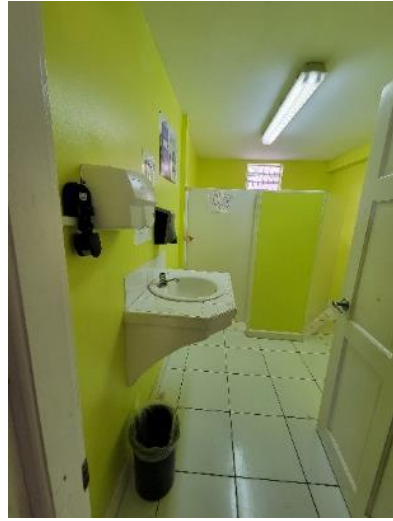
Name:

Place:

Date:(dd –mm – yyyy):

APPENDIX G: SITE PHOTOS





Saint Lucia Health System Strengthening Project
Screening Form for Potential Environmental and Social Risks
Babonneau Wellness Centre Rehabilitation Works

Objective

The purpose of the E&S screening is to assess the potential E&S risks of the proposed sub-project or activity, provide guidance on any national permitting requirements, determine if it is eligible under the project, and identify what types of E&S management instrument is needed.

In order to achieve the above, the screening process follows three stages:

- **Stage 1:** Identify whether the proposed activity or sub-project would require any national or local permitting. This provides an early indication of the potential E&S impacts of the project.
- **Stage 2:** Screen the sub-project against the **High Impact Criteria/Checklist**. The objective of this Checklist is to identify projects which would have highly significant and sensitive E&S impacts (which would raise the risk category to A as per WB OP and thereby require project restructuring).
- **Stage 3:** Screen the sub-project against **Criteria/Checklist 2– Detailed Impact Assessment Checklist**, to assess the level of significance of potential E&S impacts, and determine the E&S management instrument needed (ESIA, ESMP, ESCOPs, or none).

Scope of Works

The rehabilitation of the Babonneau Wellness Centre includes:

- 12) Repair and repaint of roof fascia boards and guttering (as needed)
- 13) Repaint and repair walls (interior and exterior)
- 14) Installation of new signage to include room name and number
- 15) Repair of fencing
- 16) Replacement of Floor tiles (with porcelain tiles)
- 17) Construction of new housing for the standby generator with water tanks installed on roof
- 18) Installation of new interior and exterior doors and windows and installation of shatterproof film on all exterior windows
- 19) Rewiring of the electrical and telecommunication systems in the building, including the installation of energy-efficient luminaires, fire alarm, emergency signage, and data outlets

- 20) Reconfiguration of internal partitions to improve functionality including the demolition of existing partitions and installation of new partitions, creating dedicated electrical and server rooms and improving accessibility for persons with disabilities
- 21) Improvements to HVAC including the installation of new split AC units, ceiling fans and wall fans
- 22) Replacement of bathroom fixtures

Stage 1. National Permitting Requirements

The sub-project or activity involves physical works. It may require approval from the Development Control Authority (DCA), either as design review or an EIA depending on the evaluation that DCA performs. Accordingly, the contractor with support from the PIU should confirm with DCA the permitting process and ensure that the activities will not be interrupted or halted due to lack of permit or approvals.

Stage 2: High Impact Checklist (to identify projects with Category A impacts)

If any of the answers to the questions below is **Yes**, then the sub-project would have resulted in the project being classified as World Bank Category A, **and would not be eligible for investment, since the project has been rated Category B.**

Sub-project title: Babonneau Wellness Centre – Minor Rehabilitation Works	
Sub-project brief description: Rehabilitation of Centre	
Question	Answer (Yes/No)
Will the project:	
1. Cause sensitive (direct and or cumulative) impacts? Examples of Sensitive impacts are those, which may be irreversible, or those which raise issues related to natural habitats and or physical and cultural resources.	NO
2. Cause diverse (direct and or cumulative) impacts? Diverse impacts are those impacting different media (air quality, water quality, noise level, risk to the community) at the same time.	NO
3. Cause unprecedented impacts? Unprecedented impacts are those, which have not been experienced before in the project’s area of influence (i.e. those which occur for the first time in the area)	NO
4. Have an area of influence that significantly exceeds its footprint?	NO

Conclusion: There will be no significant impacts and the proposed works or activities are consistent with E&S Risk Category B and are therefore eligible under the project.

Stage 3: Detailed Impact Assessment Checklist

For Eligible projects, apply the checklist below:

If the answer is YES to any of the questions, then the sub-project or activity should have an E&S management instrument to prevent or reduce any potential impacts. The E&S instrument should address each of the risks identified, in the level of detail commensurate with the risks (ESIA, ESMP, or ESCOP), according to WB OP 4.01.

If the answer is “No” to all questions, then the project would not have any potential E&S risks, and no management instrument would be required, according to WB OP 4.01.

Question		Answer (Yes/No)	Comments
Water (quality and resources)			
W1	Is the sub-project adjacent to waterways?	NO	
W2	Will the sub-project generate solid waste?	YES	The removal of unwanted equipment and construction waste
W3	Will the sub-project generate liquid waste?	NO	
W4	Will the sub-project generate demolition waste?	YES	Minor demolition works and forming of openings
W5	Will the sub-project generate hazardous waste (grease, oil, empty paint containers, etc..)?	NO	
W6	Will the sub-project consume an amount of potable water higher than 3m ³ /site/day	NO	
W7	Will the project cause interruption to water flows?	NO	

Question		Answer Yes/No	Comments
	Air (Quality and Noise level)		
A1	Will the sub-project use of chemicals, agrochemicals, corrosives, and solvents?	NO	
A2	Will the sub-project use machinery?	YES	Excavator
A3	Will the sub-project involve refurbishmentworks (marble, concrete, ceramics, wood, etc.)?	YES	
A4	Will the sub-project activities generate volatile Organic Compounds VOCs (paints, asphalt heating, preparation and application, etc.)?	YES	Low VOC paint will be used
A5	Will the sub-project involve major and/or minor demolition works?	YES	Minor demolition works and forming of openings
A6	Will the sub-project involve Asbestos management?	NO	
A7	Will the sub-project involve the installation of air conditioning units/systems?	YES	
A8	Will the sub-project involve waste burning?	NO	
A9	Will the sub-project involve Generation of odors?	NO	
	Soil (quality and erosion)		
S1	Will the sub-project cause soil erosion?	NO	
S2	Will the sub-project cause topsoil loss?	NO	
S3	Will the sub-project involve soil compaction?	NO	
S4	Will the sub-project involve concrete foundations/imperviouslayers?	YES	Foundations and slab for generator building and pump room
S5	Will the sub-project involve equipment on-site fueling? and storage?	NO	

Social impacts and Community Health and Safety			
Question		Answer (Yes/No)	Comments
CHS1	Will the sub-project involve temporary labor influx (more than 20 workers)?	NO	
CHS2	Will the sub-project cause traffic impacts and accessibility issues?	NO	There will be a minor increase in traffic for deliveries
CHS3	Could the sub-project cause utility damage?	NO	
CHS4	Will the sub-project affect physical integrity of weak structures/houses adjacent to construction sites?	NO	

Occupational Health and Safety			
Question		Answer (Yes/No)	Comments
OHS1	Will the sub-project involve potential physical hazards?	YES	Standard construction hazards
OHS2	Will the sub-project involve fire hazards?	NO	
OHS3	Will the sub-project involve slippage, falling & working at heights?	NO	
OHS4	Will the sub-project involve manual handling and lifting?	YES	Blockwork
OHS5	Will the sub-project involve risk of electrocution?	YES	Addition of Generator and ATS with associated wiring
OHS6	Will the sub-project involve excavation works?	YES	Minimal foundation works

Biodiversity			
BIO1	Will the sub-project involve works in rivers, canals, or drains?	NO	
BIO2	Will the sub-project involve land disturbance or site clearance?	NO	

Physical Cultural Resources			
CR1	Is the sub-project located near a recognized PCR conservation area or heritage site?	NO	
CR2	Does the sub-project involve significant excavations and/or movement of earth?	NO	

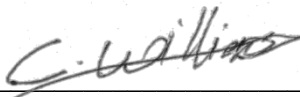
Conclusions and Recommendations:

- 1. Proposed Environmental and Social Risk Ratings (High, Substantial, Moderate or Low). Provide Justifications. Moderate**

The proposed E&S risk rating is **Moderate**. The proposed works will present minor E&S risks that are typical of small rehabilitation or renovation activities, as identified in the Stage 3 matrix (above). All can be minimized or avoided with standard E&S protocols.

- 2. Proposed E&S Management Plans / Instruments.** An ESMP will be prepared and disclosed to address the potential environmental and social risks associated with the project.

Prepared by:



 Project E&S Specialist

Reviewed by:

