

OECS REGIONAL HEALTH PROJECT
MAHAUTH HEALTH AND WELLNESS CENTRE
ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)



Client: Ministry of Health, Wellness and Social Services

Funded by: World Bank

Prepared by: Nuvision Architecture and Anonymart Architecture

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The SMART Hospitals Initiative was launched by the Pan American Health Organization to improve the safety and environmental “greenness” of health facilities. It is designed to help territories within the Caribbean Region make the transition to sustainability, to reduce their carbon footprints, to be more resilient and to be safer in the face of natural and man-made hazards.





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A Introduction and Project Overview:

PROJECT BACKGROUND:

The Government of Dominica with the assistance of the WBG is developing the OECS Regional Health Project (SMART Health Center Project) to assist with the rehabilitation and improve the preparedness of the health system to deal with public health emergencies. This project also proposes to build on resilience activities currently underway within the health sector conducted by the Ministry of Health and Social Services.

The proposed Project will have three (3) components as described below.

- i. **Component 1:** Improved Health Facilities and Laboratory Capacity.
- ii. **Component 2:** Strengthening Public Health Surveillance and Emergency Management.
- iii. **Component 3:** Institutional Capacity Building, Project Management and Coordination.

Component 1 Details: Improved Health Facilities and Laboratory Capacity.

The Ministry of Health and Social Services proposes to build upon the PAHO SMART Hospital initiative, which identified three (3) facilities that require renovations in order to improve resilience to disasters and climate variability and change.

These facilities are expected to become self-sustainable, particularly since they are in remote areas of the country. These facilities include the health centers located in Wesley, Mahaut, and Castle Bruce. It is expected that the facilities will be upgraded based on specific criteria, including:

- Renovations, provision of equipment.
- Strengthening referral networks to ensure continuing of care following a disaster.
- Identification, establishment and upgrading of these facilities for infection control and priority infectious diseases.

Component 1 will also include upgrading laboratory capacity based on identified gaps and strengthening of laboratory data management systems through the procurement of equipment. It is expected that there will be improvements in specimen collection transport and analysis through laboratory capacity development and human resource training. This component is also expected to improve the present biomedical waste management system in each of the facilities to include appropriate and safe storage and transport of medical waste to the disposal site and training of staff to undertake these activities.



Objectives and Scope of the ESMP

The Environmental and Social Management Plan (ESMP) serves as a comprehensive framework to identify, assess, mitigate, and manage potential environmental and social risks and impacts associated with a specific project. Its purpose and scope are crucial elements that define the boundaries and objectives of the plan.

The ESMP was developed after a review of the following:

- ToR developed by Client.
- Project Environmental and Social Management Framework.
- Inception Report – Mahaut Health & Wellness Center – Nov 2023.
- Draft Designs for upgrade of Mahaut Health Center to SMART – A70 Ranking.
- SMART Hospitals Toolkit.
- Other available qualitative and quantitative data relevant to the project.

The mitigation and management measures and the procedures within which they are captured are based upon:

- Project design requirements.
- Regulatory and approval requirements.
- Government agency requirements.
- Stakeholder concerns and commitments.
- Guidelines and best management practices.

Purpose:

1. Environmental Protection:

- Minimize adverse environmental impacts resulting from project activities, such as habitat destruction, pollution, and natural resource depletion.
- Promote sustainable practices to preserve ecosystems, biodiversity, and natural resources.

2. Social Responsibility:

- Safeguard the interests and well-being of affected communities, including vulnerable populations, by addressing social concerns and promoting equitable outcomes.
- Enhance community engagement and participation in project planning, implementation, and decision-making processes.



3. Compliance and Risk Management:

- Ensure compliance with relevant environmental and social regulations, laws, and standards, as well as international best practices and guidelines.
- Identify and assess potential environmental and social risks and develop strategies to mitigate or eliminate them.
- Assist the preparation of bidding and contract documents to ensure the works are carried out in accordance with requirements.

4. Stakeholder Confidence and Reputation Management:

- Build trust and credibility with stakeholders, including local communities, government agencies, investors, and civil society organizations, by demonstrating a commitment to responsible environmental and social practices.
- Protect the project's reputation and brand value by proactively addressing environmental and social issues and responding to stakeholder concerns.

5. Project Efficiency and Cost-effectiveness:

- Enhance project efficiency and cost-effectiveness by incorporating environmental and social considerations into project planning, design, and implementation processes.
- Minimize the likelihood of project delays, disruptions, or legal liabilities associated with environmental and social non-compliance.

Scope of the Environmental and Social Management Plan (ESMP)

The World Bank Safeguard Policy OP 4.01 mandates the preparation of an Environmental and Social Management Framework (ESMF) along with an Environmental and Social Management Plan (ESMP) to guide the project in screening risks and implementing recommendations to mitigate those risks.

For this project, the program-level ESMF, developed in 2019, and the subsequent Contingency Emergency Response Component (CERC) ESMF Addendum include guidance for screening potential sub-projects (i.e., individual civil works or other project-related activities) and identifying complex projects requiring additional studies to comply with safeguard policies. These documents are essential references for ensuring compliance with the safeguards throughout the project's execution. The CERC ESMF Addendum also contains infection control and prevention protocols that remain applicable.



Furthermore, the World Bank Environmental, Health, and Safety (EHS) General Guidelines and the Health Sector EHS Guidelines are relevant standards for the sub-projects to be implemented in Dominica under the OECS Health Care Project. These guidelines provide critical standards for environmental, health, and safety management applicable to the project's activities.

For more detailed information, please refer to the following documents:

- **Environmental and Social Management Framework (ESMF):** [Environmental and Social Management Framework for Dominica](#)
- **CERC ESMF Addendum:** [Addendum to Environmental and Social Management Framework for Dominica Contingency Emergency Response Component](#)
- **World Bank EHS General Guidelines:** [General EHS Guidelines](#)
- **Health Sector EHS Guidelines:** [Health Care Facilities EHS Guidelines](#)

The following sub-section provides details of the scope of work undertaken in preparation of this ESMP based on quality requirements determined by the Client:

1. Project Identification and Description:

- Defines the specific project or activity for which the ESMP is being developed, including its objectives, scope, and geographic location.

2. Stakeholder Analysis:

- Identifies and analyzes key stakeholders who may be affected by or have an interest in the project, including local communities, government agencies, NGOs, investors, and project developers.

3. Baseline Assessment:

- A comprehensive assessment of the project's current environmental and social conditions, including baseline data collection, analysis, and documentation.

4. Impact Assessment:

- Identifying and assessing potential environmental and social impacts associated with the project throughout its lifecycle, from planning and construction to operation and decommissioning.

5. Mitigation and Management Measures:

- Develop and implement specific measures to avoid, minimize, or mitigate identified environmental and social impacts, including engineering



controls, management practices, and community development initiatives.

6. Monitoring and Reporting:

- Establish a monitoring and evaluation framework to track the implementation and effectiveness of mitigation measures, including data collection, analysis, reporting, and feedback mechanisms.

7. Capacity Building and Training:

- Provide training and capacity-building support to project staff, contractors, and affected communities to enhance their understanding of environmental and social issues and improve their ability to implement the ESMP.

8. Grievance Mechanism:

- Establish a transparent and accessible grievance redress mechanism to address complaints, concerns, or grievances raised by stakeholders regarding environmental and social impacts associated with the project.

9. Documentation and Reporting:

- Document all activities related to the development, implementation, and monitoring of the ESMP, including reports, records, and correspondence, to ensure accountability and transparency.

10. Review and Updating:

- Recommendations for periodical review and updating of the ESMP to reflect changing project conditions, new information, stakeholder feedback, and evolving environmental and social standards and regulations.

11. Approval and Implementation:

- The Project Specific ESMP shall be approved by the MOHWDI, submitted through the PIU.
- Implementation of the ESMP shall be mandatory through inclusion in bid documents and contracts awarded to Contractors selected to conduct the works.

This Project Specific ESMP address different basic requirements to ensure that the most likely environmental, social and health impacts of the proposed works under this Project are addressed. It also includes a general checklist to verify compliance with the requirements established herein.



B Legal and Institutional Framework

Institutional Framework

The following Government entities and organizations constitute the core components of the project institutional framework:

- ◆ Ministry of Health, Wellness and Social Services
- ◆ Physical Planning Division
- ◆ Lands and Surveys Division
- ◆ Dominica Solid Waste Management Corporation
- ◆ Caribbean Public Health Agency
- ◆ National Emergency Management Office
- ◆ Labour division of the Ministry of National Security

Legal Framework

In accordance with relevant national and international laws, regulations, and standards governing environmental and social management practices, this Environmental and Social Management Plan (ESMP) is designed to ensure compliance and promote responsible conduct throughout the design and construction phases of the OECS Regional Health Project.

The Commonwealth of Dominica has a large set of specific standards that refer to emission, effluent, and noise standards, as well as standards regarding the handling and disposal of specific wastes ranging from sewage to hazardous wastes.

The following subsections present all relevant Laws, National and International Standards as well as regulations which pertain to or have bearing on the proposed project during the design, construction and operational phases.

Physical Planning Act (2002)

This is an act to make provision for the orderly and progressive development of land in both urban and rural areas and to preserve and improve the amenities thereof; for the grant of permission to develop land and for other powers of control over the use of land. This act also makes provision for the regulation of the construction of buildings and related matters. It also provides for the protection of the environment and is administered by the Physical Planning Authority established by the act.



Land Use Policy

Dominica's Land Use Policy was adopted in 2014 and is authorized under the Physical Planning Act (2002). It provides direction for issues related to land use planning in the Commonwealth of Dominica. The National Land Use Policy sets the foundation for all land use decisions and describes how best to manage development to improve quality of life for Dominicans, through economic and social development, protecting human health and safety, and conserving the natural environment.

Environmental Health Services Act (No. 8 of 1997)

The Environmental Health Services Act makes provision for the conservation and maintenance of the environment in the interest of health generally and relation to places visited by the public. The act provides the Environmental Health Division with the authority to carry out the functions of the Minister of Health including investigation and providing advice on environmental pollution management, including waste disposal and air quality assessments. The act also makes provisions for granting of permission for discharge into the environment of any pollutant or contaminant upon satisfaction that appropriate measures are taken to minimize these pollutants or contaminants.

Solid Waste Management Act

The act makes provision for the establishment of the Solid Waste Management Corporation with the responsibility of making provision for the collection transport storage treatment and disposal of solid waste in Dominica. The act details the functions of the corporation including making provision for the management of medical and hazardous wastes, the management of sanitary landfills and for developing and introducing alternative and nontraditional measures of waste disposal.

OECS Building Code

Dominica subscribes to the requirements of the OECS building code. The Governments of the OECS have recognized and have placed emphasis on the development of building standards which would prevent or mitigate the damage caused by extreme natural events. The OECS Secretariat has therefore, with the assistance of the United Nations Development Programme and through the UNCHS/UNDP Project for Programme Support to the Human Settlements Sector in the OECS (CAR/89/006), developed standard building codes and guidelines which speak directly to the specific requirement of each OECS country. The codes and guidelines are based on the Caribbean Uniform Building



Code (CUBiC) and other regional codes such as the Bahamas Building Code, the draft Jamaica National Building Code and the Turks and Caicos Islands Building Code. The codes and guidelines so developed have become part of each country's regulatory mechanisms for ensuring adequate building standards.

Labour standards Act No 2 of 1977

This act makes provision for the fixing of the minimum wage and for the determination of working hours, leave and general matters relating to the welfare of workers in Dominica. It establishes the eight-hour workday and the 40-hour work week. Workers exceeding these hours are to be paid overtime.

Employment Safety Act

Dominica's Employment Safety Act, 3 of 1983, provides for the safeguard of safety and health at work and for the establishment of consultative and advisory committees and the appointment of safety officers. It makes provision for inspections to be conducted at each workplace by safety officers appointed by the Minister of Labour to ascertain whether there are breaches of the act and whether the safety of employees is protected.

Noise Abatement Act 1993

The Noise Abatement Act concerning noise control and abatement, the project is affected by sections 6, 7, 14 and 15.

Table 1 Noise Abatement Act 1993 – Relevant Clauses

Regulatory clauses	Subject of clauses
Section 6: Control of noise on construction sites (d) any work of engineering construction	Concerning operating hours, authorized noise level, equipment allowed to be used for the projects involved.
Section 7: Prior consent for work of construction engineering Every person who intends to carry out any work of engineering	Concerning the contents of the pre-project consent request as regards the law covering noise abatement.
Section 14: Reduction of noise levels If it appears to the Minister- (a) that the level of noise emanating from any premises to which a Noise Abatement Order applies is not acceptable having regard to the purposes for which the Order was made; and	Concerning the reply expected by the Ministry to a Noise Abatement Order.



<p>(b) that a reduction in that level is practicable at reasonable cost and would afford a public benefit.</p>	
<p>Section 15: Noise from plant or machinery</p> <p>(a) for requiring the use, on or in connection with any plant or machinery, of devices or arrangements for reducing the noise caused by the plant or machinery;</p> <p>(b) for limiting the level of noise which may be caused by any plant or machinery when used for works to which section 5 applies or which may be caused outside a factory by the use of plant or machinery in the factory</p>	<p>Concerning the regulatory measures that may be taken in order to reduce the noise involved with the project.</p>

World Bank Safeguard Policies

The World Bank projects and activities are governed by Operational Policies (OP), which are designed to ensure that the projects are economically, financially, socially and environmentally sound.

WB OP 4.01: The World Bank's policy on Environmental Assessment (OP 4.01) is used to identify, avoid, and mitigate the potential negative environmental impacts associated with Bank lending operations. This policy is considered to be the umbrella policy for the Bank's "environmental safeguard policies", which among others include: Natural Habitats (OP 4.04), Forests (OP 4.36), Pest Management (OP 4.09), Physical Cultural Resources (OP 4.11), and Safety of Dams (OP 4.37). The Bank's "social safeguard policies" include Involuntary Resettlement (OP 4.12) and Indigenous Peoples (OP 4.10).

The World Bank Safeguard Policy OP 4.01 requires that an Environmental and Social Management Framework (ESMF) be prepared along with an Environmental and Social Management Plan (ESMP) to guide the project's screening of project risks and its implementation of recommendations to reduce those risks. Dominica completed its ESMF in 2019 which serves as a basis for this Project/Sub-Project Specific ESMP.

Under OP 4.01, the Bank will undertake environmental screening of each proposed project to determine the appropriate extent and type of environmental assessment required. Proposed projects are classified into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts. The categories of potential environmental impacts are classified as A, B, C and FI. This OECS Regional Health Project is classified as **Category B**, meaning that environmental impacts for the type of works anticipated under the project are expected to be moderate to minimal in nature and can be readily managed through the application of appropriate and well-established engineering and management measures.



Category	Description
Category B	Category B project has potential adverse environmental impacts on human populations or environmentally important areas, including wetlands, forests, grasslands, and other natural habitats - which are less adverse than those of Category A projects. These impacts are site specific; few, if any of them, are irreversible; and in most cases mitigation measures can be designed more readily than for Category A projects.

The Castle Bruce Health Centre sub-project to be implemented in the Commonwealth of Dominica as part of the OECS Health Project has been screened in accordance with the ESMF and found to be eligible for funding under the project, as it does not pose unacceptably high levels of risk.

OECS Regional Health Project ESMF – Dominica (May 2019)

Purpose and Scope

The ESMF serves as a comprehensive guide to identify potential risks, analyse strategies for risk minimization, and provide guidance during project implementation. This document underscores the Ministry of Health and Social Services' commitment to maintaining good environmental and social management practices throughout the project cycle. Additionally, it serves as a public document to inform stakeholders and improve the project by incorporating community feedback.

Since the specific details of the site locations are not known at the time of project preparation, an ESMF is required. Although activities with the potential for significant negative environmental and social impacts are not expected, any identified risks will prompt a subproject-specific environmental and/or social assessment. These assessments will be reviewed and approved by the World Bank.

Risk Identification and Mitigation

All proposed activities will undergo environmental screening to identify and mitigate potential negative impacts. This process involves analysing design alternatives and implementing measures to avoid or reduce adverse effects. The screening tool is outlined in Section 5.1 Pre-Design Phase.

This ESMF document was crafted to manage anticipated risks in accordance with World Bank safeguards and global best practices. It serves as a public document to keep stakeholders informed and engaged, providing an opportunity to improve the project through stakeholder feedback on relevant concerns or issues.



CERC-ESMF: ADDENDUM TO ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF) FOR CONTINGENCY EMERGENCY RESPONSE COMPONENT (CERC) OF THE OECS REGIONAL HEALTH PROJECT (P168539) - APRIL 2020

This document is an Addendum to the Environmental and Social Framework (ESMF) for Component 4, the Contingent Emergency Response Component (CERC), of the OECS Regional Health Project (P168539). The EMSF and this Addendum are intended to guide the environmental and social risk management activities of the emergency response component in response to the recent COVID-19 pandemic and form the CERC-ESMF which is part of the Operations Manual for the CERC action.

The project ESMF includes templates for relevant Environmental and Social Management Plans (ESMPs) which provide guidance for the construction and operation of healthcare facilities in general. For small civil works under CERC, the Project Implementation Unit (PIU) will prepare an ESMP describing the works/activities to be conducted and the associated mitigation measures to be used to avoid or reduce environmental and social risk. For projects or works with potential exposure to COVID-19, the ESMP will also include the additional safety measures in this Addendum, as provided in the following Annexes:

- A. Screening Tool for E&S Risks
- B. Infection Prevention Control Protocol (IPCP)
- C. Health and Safety Guidelines for Retrofitting/Rehabilitation of Medical Facilities
- D. ESHS Risks and Mitigation Measures for Small Civil Works at Health Care Facilities
- E. Communication Guidance

WBG ESH Guidelines

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors.

The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. Application of the EHS Guidelines to existing facilities involves the establishment of site-specific targets, with an appropriate timetable for achieving them. The applicability of the EHS Guidelines is tailored to the hazards and risks established for the proposed project



on the basis of the results of the environmental and social assessments conducted, in which site-specific variables, such as host country context, assimilative capacity of the environment, and other project factors, were taken into account.

WBG ESH Guidelines for Health Care Facilities

These industry sector EHS guidelines are designed to be used together with the General EHS Guidelines document, which provides guidance to users on common EHS issues potentially applicable to all industry sectors.

The EHS Guidelines for Health Care Facilities include information relevant to the management of EHS issues associated with health care facilities (HCF) which includes a diverse range of facilities and activities involving general hospitals and small inpatient primary care hospitals, as well as outpatient, assisted living, and hospice facilities. Ancillary facilities may include medical laboratories and research facilities, mortuary centers, and blood banks and collection services. Annex A provides a description of activities in this sector.

World Bank Group Procurement Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) Prevention and Response Measures

SEA/SH is a global issue that affects 1 in 3 women in their lifetime, and also affects some men, girls and boys. Incidents of SEA/SH have occurred in projects financed by the World Bank. As a result, the Bank is taking concerted measures to strengthen its approach to management and prevention of SEA/SH risks.

The new measures came into effect on January 1, 2021. They apply to all Works procurements, whose procurement process is initiated after January 1, 2021, under Projects assessed as high-risk of SEA/SH that apply Standard Procurement Documents (SPDs) (based on FIDIC General Conditions)¹. Any application for retroactive financing or where advance procurement has been undertaken by the Borrower will need to show that SEA/SH risks are fully addressed and that any firm awarded a contract to undertake the initial work is/was not disqualified by the Bank at the time the contract was awarded to be considered eligible projects for financing.

International Labour Organisation (ILO) Conventions

It will be a contractual requirement for all service and material providers to the Project that they comply fully with the laws and regulations of the GoCD concerning employment of labour and working conditions.



The Contractors project policy for its own employees will also follow the laws and regulations of the GoCD and will comply with (at a minimum):

- ILO Convention 29 on Forced Labour.
- ILO Convention 105 on the Abolition of Forced Labour.
- ILO Convention 138 on Minimum Age (of Employment).
- ILO Convention 182 on the Worst Forms of Child Labour.
- ILO Convention 100 on Equal Remuneration.
- ILO Convention 111 on Discrimination (Employment and Occupation).

Codes and International Quality Standards

- ◆ **Green Standards:** all “green” interventions will be in accordance with the Smart Hospital Green checklist which is guided by Leadership in Energy & Environmental Design (LEED) and Building Establishment Assessment Method (Breeam).
- ◆ All retrofitting works should comply with PAHO`s Technical Standards for Retrofitting Guide o Mechanical codes and standards.
- ◆ **Fire Codes :** National Fire Protection Association Life Safety Code, 2016, NFPA 101, and Amendments.



C Stakeholder Engagement and Consultation:

- Identification of stakeholders and their concerns.
- Plan for engaging stakeholders throughout the project lifecycle, including affected communities, local authorities, and NGOs.

Stakeholder Engagement October 2023 - January 2024

- ◆ HIS and Green Checklist Assessments – October 2023
- ◆ Kick Off Meeting – November 2023
- ◆ Onsite Consultations with Management and Staff of respective Health & Wellness Centers – December 2023-January 2024

The following is a summary of the recommendations, comments and concerns expressed by stakeholders during the consultations:

- ◆ Primarily, the strategic separation of the functions of the Emergency Department from the outpatient department
- ◆ Improve access for ambulance to emergency room including covered area
- ◆ Redesign entrance way including ramp approaches and the physically challenged
- ◆ Waiting areas and corridor spaces to be redesigned
- ◆ Introduce an office for the family nurse practitioner
- ◆ Provide functional space for Pharmacy storage and distribution of medication
- ◆ Provide a room for dental care
- ◆ Provide office space for Environmental Health Office (EHO)
- ◆ Provide office space for Community Health Nurse (CHN)
- ◆ allocate space for storage of domestic supplies
- ◆ Provide a suitable sluice room
- ◆ Install fencing around facility for better security
- ◆ Provide proper delivery room
- ◆ Provide additional washroom facilities for clients and make handicap friendly

Feedback obtained from the stakeholder engagement activities are contained within the project inception report. The above recommendations were incorporated into the designs developed by the team of consultants. For additional information, refer to HIS report and GREEN analysis circulated separately.

D Baseline Assessment

A comprehensive assessment of the project's current environmental and social conditions, including baseline data collection, analysis, and documentation.

Site Description

Description of Health Facility

Type of Facility: The facility is a type 1 Health Facility with 7 staff members and administers to Max 200 patients per week. It is the intention of the Ministry of Health, Wellness and Social Services to convert the facility to a type 3 facility.

Number of Beds: 0

Catchment population: The Facility serves a population of 7000 and covers the areas of Mahaut, Campbell Warner, Canefield, Jimmit and Belfast



Figure 1 Google Earth Image of Project Location

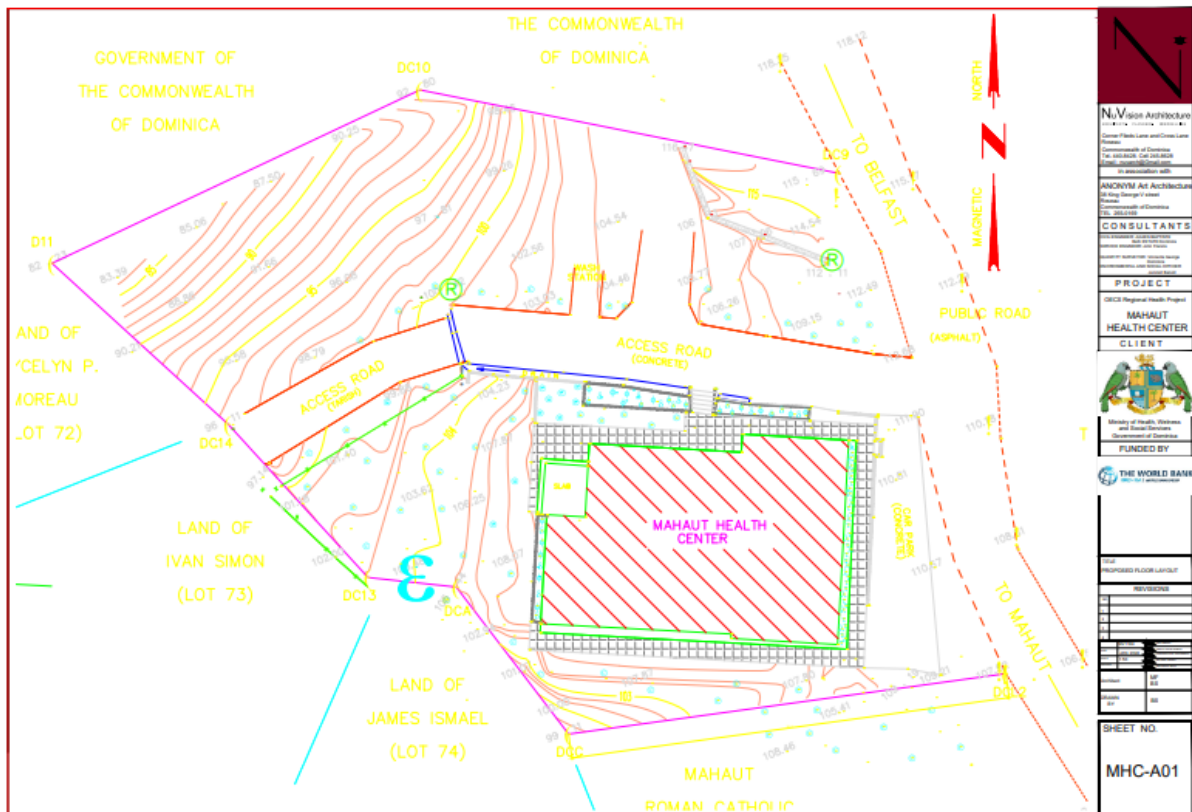


Figure 2 Technical Drawing of Project Site

Physical description: The facility is primarily a two-story structure with an open terrace on the first floor. The building is constructed with hollow concrete blocks (HBC) and reinforced framed elements made up of suspended floor slab and supporting beams and columns. The roof is primarily a hip concrete roof with galvanized sheeting cladding.

Building area: 3713.33 sqft.

Medical Services: The facility provides the following services: Maternal and Child health, CNCDs screening, Cancer screening, Casualties, Home visits, clinics, Vaccinations, Counselling services, Community outreach, Covid Testing

Environmental Features and Conditions

- **Grounds and Property:** The facility is located on state-owned land. The site has been assessed for susceptibility to landslides, erosion, and flooding. Drainage systems are in place to prevent adverse effects on sensitive receptors, including the marine environment.



- **Adjacent Land Uses:** The surrounding area includes residential and commercial properties. There are no identified sensitive land uses nearby.
- **Traffic Conditions:** The roads adjacent to the facility experience moderate traffic. Assessments have ensured that site access does not pose any hazards or constraints.
- **Unique Features:** The site’s drainage towards sensitive marine environments necessitates stringent monitoring and mitigation measures during both construction and operation phases.

(HSI) Safe and (Checklist) Green Assessments

Appraisal of Smart Hospitals Assessment Report – Mahaut Health and Wellness Center

The SMART Hospitals retrofit project is expected to improve the Safety of the facility as well as the level of Greenness through improved electrical and water efficiency and enhancing the user comfort through improved indoor environmental quality.

The Hospital Safety Index (HSI) and Green Checklist Reports for the facility were carried out and the following table highlights the areas where improvements are recommended in order to meet the minimum standards in keeping with PAHO Smart Hospitals criteria of A70 (HSI = “A” rating and Green = 70% minimum). The Smart ratings achieved during the assessments of the facility on 21th October 2023 were as follows: Hospital Safety Index (HSI) = B Green Checklist = 38 % See Annexes for full HSI report and Green analysis.

Table 2 Recommendations for Improving HSI and SMART Rating to A70 – MAHAUT

The following Structural items are ranked as Low or Average Safety:		
Items with low-avg. Safety	Assessments	Smarting Improvement
2. Facility built and/or repaired using current safety standard	Drawings to be analysed	A structural analysis will be undertaken to determine to what extent the building can withstand wind loads
4-Condition of building	Cracks are seen on external walls on patio which causes the infiltration of water in some instances	External walls to be cleaned and repaired.
8- structural redundancy	Three lines of resistance in each direction	Further analysis of walls to determine effectiveness to be carried out
5-Condition of construction material	Vertical cracks seen on internal walls.	Investigate further to determine cause of cracks and provide necessary solutions



11- irregularity in building structure	As per existing drawings, sections of walls have no foundation base	Method of pinning unreinforced masonry walls need to be undertaken.
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During the baseline (SMART, GREEN) assessment a total of sixteen (16) non-structural items/issues on the checklist were ranked as average or low Safety and recommendations for SMARTing improvements were proposed by the team of Consultants.

Ten (10) architectural items were ranked as average Safety and recommendations for SMARTing improvements were proposed by the team of consultants.

With respect to GREEN rankings, a total of ten (10) items were ranked as low Green and recommendations for SMARTing (Green) improvements were proposed by the team of consultants.

Mahaut Health Center Scope of Works:

- i. Expansion to existing building vertically
- ii. Retrofitting of existing building
- iii. Installation of PV system
- iv. Installation of rainwater catchment
- v. Demolition of walls
- vi. Erection of walls
- vii. Electrical upgrades
- viii. Waste disposal upgrade

The following works are planned for the Mahaut Health Center as part of the facility's upgrade and retrofitting:

1. Retrofitting of Existing Building:

- The current structures will be upgraded to improve safety and functionality. This will include structural reinforcements to ensure compliance with updated building codes and to enhance the building's resilience to natural hazards such as earthquakes and hurricanes.

2. Installation of Photovoltaic (PV) System:

- A solar PV system will be installed to reduce the facility's dependence on the national grid, promote energy efficiency, and enhance the sustainability of the health center.



3. Installation of Rainwater Catchment System:

- A rainwater harvesting system will be installed to supplement the facility's water supply. This system will capture and store rainwater for non-potable uses, such as irrigation, flushing toilets, and general cleaning.

4. Demolition of Walls:

- Certain internal and external walls will be demolished as part of the redesign and reconfiguration of the space to better accommodate the upgraded services that the facility will offer.

5. Erection of Walls:

- New walls will be constructed where necessary to create additional rooms or modify existing spaces to improve patient flow and service delivery.

6. Electrical Upgrades:

- The facility's electrical system will be upgraded to support the increased load from the new PV system and other electrical installations. This will include the installation of energy-efficient lighting and the replacement of outdated wiring to meet current safety standards.

7. Waste Disposal Upgrade:

- The waste management system will be improved to ensure that medical and general waste is handled in a manner that is safe, efficient, and compliant with environmental regulations. This may involve the installation of new waste disposal units and improved segregation and storage facilities.

Site Management and Operations During Construction:

- **Location of Works:** All construction activities, including parking, storage, and temporary works, will be confined within the existing grounds of the Mahaut Health Center. This will minimize disruption to the surrounding community and ensure that the project remains contained within the designated area.
- **Operational Status During Works:**
 - The Mahaut Health Center will continue to operate as a health facility during the retrofitting and construction works. Measures will be put in place to ensure that patient care and health services are not disrupted. This includes phasing construction activities to allow for the uninterrupted provision of critical services, setting up temporary barriers to separate



construction zones from operational areas, and implementing strict safety protocols to protect patients, staff, and visitors.

- Should any part of the facility require temporary closure, advance notice will be given to the community, and alternative arrangements will be made to ensure continued access to healthcare services.

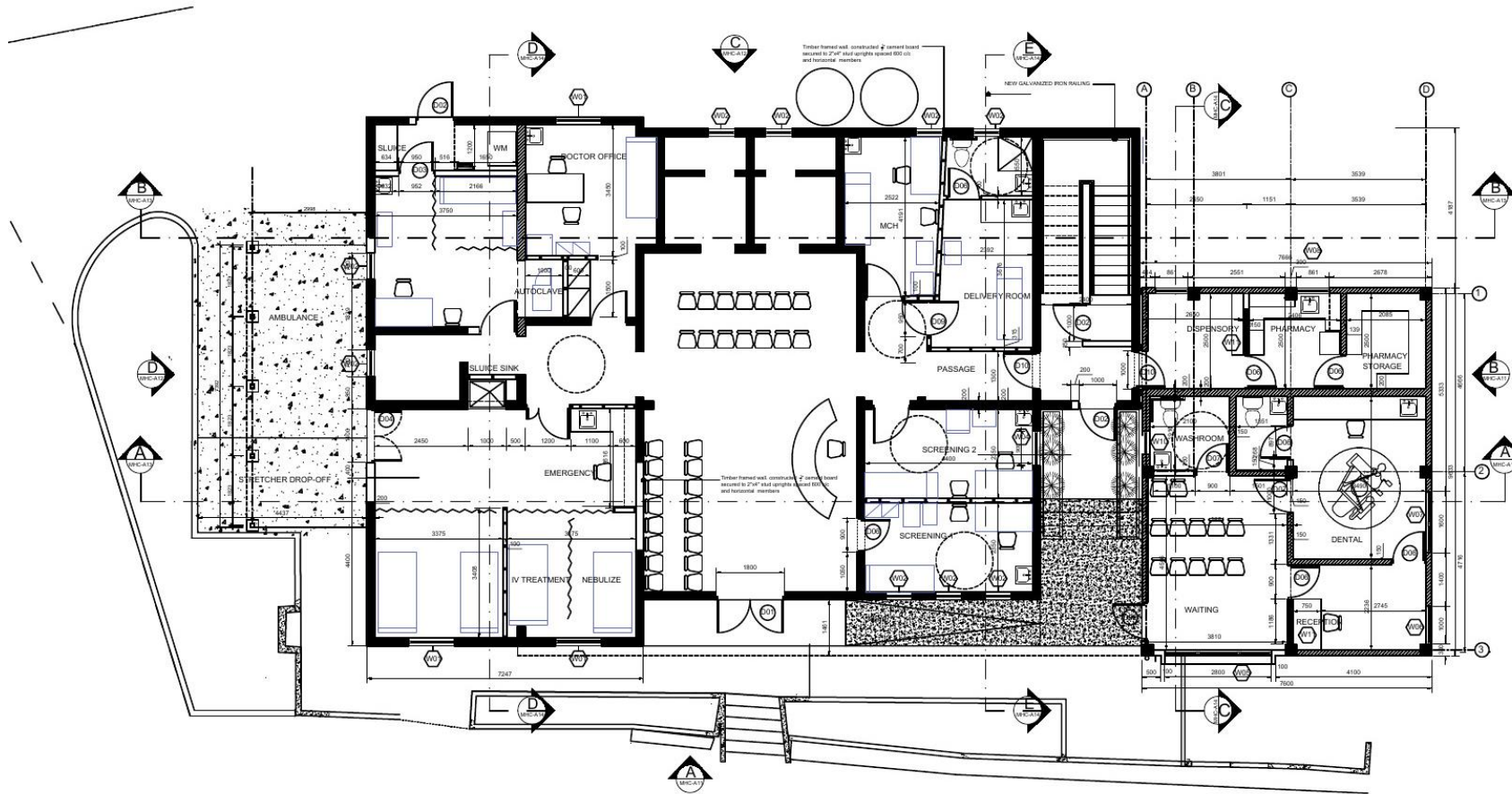


Figure 3 Mahaut Health Center – Proposed Layout



E IMPACT ASSESSMENT

General Overview

This section provides a detailed analysis of the specific impacts associated with the construction activities at the health facility site. Each impact is examined in the context of the unique and particular circumstances of the site to ensure that all relevant issues are addressed effectively.

OECS SMART Health Centre Project - Dominica (Mahaut):

Table 3 Impact Assessment

Aspect	Phase	Impact	Receptors	No. of Receptors Affected	Sensitivity of Receptors	Level of Public Concern	Risk of Exceeding Legal	Magnitude	Timeframe	Spatial Scale	Consequence	Probability	Significance
Vertical Expansion	Construction	Structural changes and increased height may affect visual aesthetics and local environment.	Local community, adjacent properties	Moderate	Medium	Medium	Low	Moderate	Medium	Local	Moderate	Medium	Moderate
Retrofitting Existing Building	Construction	Potential disruption due to construction activities and noise.	Building occupants, nearby residents	High	High	High	Medium	High	Short-term	Site-specific	High	High	High
Installation of PV System (10Kw)	Construction	Minimal disturbance, mainly installation-related impacts.	Facility staff, local community	Low	Low	Low	Low	Low	Short-term	Site-specific	Low	Low	Low
Installation of Rainwater Catchment System	Construction	Minor disruption during installation, beneficial long-term environmental impact.	Facility staff, local environment	Low	Low	Low	Low	Low	Short-term	Site-specific	Low	Low	Low
Demolition of Walls	Construction	Dust, noise, and potential structural impact on adjacent areas.	Building occupants, adjacent properties	Moderate	Medium	Medium	Medium	Moderate	Short-term	Site-specific	Moderate	Medium	Moderate
Erection of New Walls	Construction	Noise and dust during construction; changes in building layout.	Building occupants, local community	Moderate	Medium	Medium	Low	Moderate	Short-term	Site-specific	Moderate	Medium	Moderate
Electrical Upgrades	Construction	Potential short-term disruptions; long-term improvements to facility infrastructure.	Facility staff, local community	Moderate	Medium	Medium	Low	Moderate	Short-term	Site-specific	Low	Medium	Low



Aspect	Phase	Impact	Receptors	No. of Receptors Affected	Sensitivity of Receptors	Level of Public Concern	Risk of Exceeding Legal	Magnitude	Timeframe	Spatial Scale	Consequence	Probability	Significance
Waste Disposal Upgrade	Construction	Minimal disturbance; improved waste management system.	Facility staff, local community	Low	Low	Low	Low	Low	Short-term	Site-specific	Low	Low	Low
Emergency Department & Outpatient Separation	Construction	Improved patient management; minor disruptions during reorganization.	Patients, medical staff	Moderate	Medium	Medium	Low	Moderate	Medium-term	Site-specific	Moderate	Medium	Moderate
Entrance Redesign	Construction	Improved accessibility; minor disruptions during construction.	Patients, visitors, facility staff	Moderate	High	High	Low	Moderate	Short-term	Site-specific	Moderate	Medium	Moderate
Storage Space Optimization	Construction	Improved storage; minor disruptions during reorganization.	Facility staff	Moderate	Medium	Medium	Low	Moderate	Short-term	Site-specific	Low	Low	Low
Ambulance Bay Extension	Construction	Improved vehicle protection; minor disruptions.	Emergency service staff, local community	Moderate	Medium	Medium	Low	Moderate	Short-term	Site-specific	Low	Low	Low
New Laundry Area	Construction	Improved laundry services; minor disruptions.	Facility staff	Low	Low	Low	Low	Low	Short-term	Site-specific	Low	Low	Low
Sterilization Area	Construction	Improved sterilization facilities; minor disruptions.	Medical staff	Moderate	Medium	Medium	Low	Moderate	Short-term	Site-specific	Low	Low	Low
Sluice Sink Installation	Construction	Enhanced hygiene; minimal disruption.	Medical staff	Low	Medium	Low	Low	Low	Short-term	Site-specific	Low	Low	Low
Additional Dressing Bay	Construction	Improved emergency care; minimal disruption.	Patients, medical staff	Moderate	Medium	Medium	Low	Moderate	Short-term	Site-specific	Low	Low	Low

Aspect	Phase	Impact	Receptors	No. of Receptors Affected	Sensitivity of Receptors	Level of Public Concern	Risk of Exceeding Legal	Magnitude	Timeframe	Spatial Scale	Consequence	Probability	Significance
Relocation of Battery Storage	Construction	Safe relocation; minimal disruption.	Facility staff	Low	Low	Low	Low	Low	Short-term	Site-specific	Low	Low	Low
Sharp Container Space	Construction	Improved waste management; minimal disruption.	Medical staff	Low	Low	Low	Low	Low	Short-term	Site-specific	Low	Low	Low

Risk Assessment:

Table 4 Risk Assessment Matrix

Ref	Package	Activity	Construction Aspect	ESHRQ Aspect	Potential Impact	Risk Level	Mitigation Measure	Risk Level
1	Expansion	Expansion to Existing Building	Vertical construction and structural changes	Structural Integrity	Increased risk of structural failure	High	Detailed structural assessment; ensure compliance with local building codes. Monitor structural integrity throughout the expansion.	Medium
2	Retrofitting	Retrofitting of Existing Building	Renovation and modernization	Health and Safety	Noise, dust, and potential disruption	Medium	Implement noise and dust control measures. Ensure proper signage and barriers.	Low
3	PV System Installation (10Kw)	Installation of PV System	Installation and electrical integration	Safety, Electrical Safety	Minor disturbance; electrical hazards	Low	Follow manufacturer's installation guidelines. Ensure electrical safety standards are met.	Low

Ref	Package	Activity	Construction Aspect	ESHRQ Aspect	Potential Impact	Risk Level	Mitigation Measure	Risk Level
4	Rainwater Catchment System	Installation of Rainwater Catchment	Installation and integration	Environmental Impact	Minor disruption; long-term environmental benefit	Low	Use best practices for rainwater system installation. Ensure minimal disruption during installation.	Low
5	Demolition	Demolition of Walls	Removal of existing structures	Health and Safety	Dust, noise, and potential structural impact	High	Implement dust suppression and noise control measures. Ensure structural stability during demolition.	Medium
6	Erection of New Walls	Erection of Walls	Construction of new walls	Health and Safety	Noise and dust; change in building layout	Medium	Use dust control and noise suppression techniques. Monitor construction site for safety.	Low
7	Electrical Upgrades	Electrical Upgrades	Upgrade of electrical systems	Electrical Safety	Short-term disruptions; potential electrical hazards	Medium	Ensure compliance with electrical codes. Perform upgrades during off-peak hours to minimize disruption.	Low
8	Waste Disposal Upgrade	Waste Disposal Upgrade	Improvement of waste management systems	Environmental and Health	Improved waste management; minimal disruption	Low	Implement waste management best practices. Monitor and document waste disposal processes.	Low
9	Vertical Expansion	Expansion of Building Vertically	Increased height and structural changes	Structural Integrity	Potential for structural impact; visual impact	High	Conduct structural analysis; adhere to zoning and building regulations.	Medium
10	Emergency Department Redesign	Emergency Department Separation	Redesign and separation of functions	Health and Safety	Improved patient management; minor disruptions	Medium	Plan redesign to minimize disruptions. Implement temporary measures to manage patient flow during construction.	Low
11	Entrance Redesign	Redesign Entrance	Accessibility improvements	Accessibility	Improved access; minor disruptions	Medium	Follow accessibility design standards. Ensure minimal disruption during construction.	Low

Ref	Package	Activity	Construction Aspect	ESHRQ Aspect	Potential Impact	Risk Level	Mitigation Measure	Risk Level
12	Storage Space Optimization	Storage Space Reorganization	Reorganization and addition of storage	Health and Safety	Improved storage; minor disruptions	Low	Implement efficient storage solutions. Minimize impact on facility operations.	Low
13	Ambulance Bay Extension	Extension of Ambulance Bay	Increased protection for emergency vehicles	Safety and Accessibility	Improved vehicle management; minor disruptions	Low	Ensure extension meets safety and accessibility standards.	Low
14	New Laundry Area	Creation of New Laundry Area	Addition of laundry facilities	Health and Safety	Improved facilities; minor disruptions	Low	Implement construction best practices to minimize disruption.	Low
15	Sterilization Area Creation	Creation of Sterilization Area	Addition of sterilization facilities	Health and Safety	Improved hygiene; minor disruptions	Low	Ensure installation adheres to health and safety standards.	Low
16	Sluice Sink Installation	Installation of Sluice Sink	Addition of hygiene facility	Health and Safety	Improved hygiene; minimal disruption	Low	Follow installation guidelines to ensure proper functioning.	Low
17	Dressing Bay Addition	Creation of Additional Dressing Bay	Addition to emergency ward	Health and Safety	Improved emergency care; minimal disruption	Low	Implement construction measures to minimize impact.	Low
18	Battery Storage Relocation	Relocation of Battery Storage	Reorganization of PV system	Health and Safety	Safe relocation; minimal disruption	Low	Ensure safe relocation procedures are followed.	Low
19	Sharp Container Space	Creation of Sharp Container Space	Addition of waste management facilities	Health and Safety	Improved waste management; minimal disruption	Low	Ensure proper placement and secure installation of containers.	Low



F IMPACT MITIGATION MEASURES: Design & Construction Phases

Design-Integrated Mitigation Measures

The design incorporates several mitigation measures to address impacts during the operation phase:

1. Waste Management

- **Measure:** The design includes dedicated waste storage areas that meet waste management requirements.
- **Purpose:** Ensures proper handling and disposal of waste during operation.

2. Universal Access

- **Measure:** Ramps and other facilities are included to ensure accessibility for all users.
- **Purpose:** Provides universal access to the facility.

3. Fuel Storage

- **Measure:** Bunded fuel stores are included to contain leaks.
- **Purpose:** Prevents environmental contamination.

4. Water Management

- **Measure:** Water collection and containment measures are included.
- **Purpose:** Prevents runoff from reaching sensitive environments.

Construction Phase Mitigation Measures

The following section of this ESMP provides details of GCC requirements, whilst the subsequent section (items 1-11) is a list of pertinent additional requirements.



GCC Requirements

The mitigation measures for the construction phase are based on the Environmental, Social, Health, and Safety (ESHS) requirements set out in the General and Particular Conditions of Contract for small civil works.

Health, Safety, and Protection of the Environment

Health and Safety

Contractor Responsibility: The Contractor is responsible for ensuring the safety of all activities on the Site.

Contractor Obligations: The Contractor shall:

- (a) Comply with all applicable health and safety regulations and laws.
- (b) Adhere to all health and safety obligations specified in the Contract.
- (c) Ensure the safety and health of all persons entitled to be on the Site and other execution places.
- (d) Keep the Site and Works clear of unnecessary obstructions to avoid danger.
- (e) Provide fencing, lighting, safe access, guarding, and watching of the Works until the Contract Completion Certificate is issued.
- (f) Provide necessary Temporary Works for the protection of the public and adjacent landowners.
- (g) Provide appropriate health and safety training for Contractor's Personnel and maintain training records.
- (h) Engage Contractor's Personnel in promoting health and safety, including training on occupational safety and health and provision of PPE without expense to the Personnel.
- (i) Implement processes for Personnel to report unsafe work situations and remove themselves from imminent danger.
- (j) Ensure no retaliation against Personnel reporting unsafe situations.
- (k) Collaborate with Employer's Personnel and other contractors on health and safety requirements.
- (l) Establish and implement a system for regular (at least six-monthly) reviews of health and safety performance and the working environment.



Health and Safety Manual: The Contractor shall submit a health and safety manual to the Project Manager for approval, as per GCC Sub-Clause 16.2. The manual shall include:

- (a) Procedures for a safe working environment, including control measures for chemical, physical, and biological agents.
- (b) Training details and records.
- (c) Emergency response procedures.
- (d) Remedies for adverse impacts such as injuries and diseases.
- (e) Measures to minimize community exposure to diseases.
- (f) Policies for managing accommodation and welfare facilities.
- (g) Any other requirements stated in the Specification.

Protection of the Environment

Environmental Protection: The Contractor shall:

- (a) Limit damage and nuisance from pollution, noise, and other activities.
- (b) Ensure emissions, surface discharges, and pollutants do not exceed specified values or legal limits.

Remediation: In case of environmental damage, the Contractor shall agree with the Project Manager on actions and timelines to remedy the situation and implement these remedies at their cost to the satisfaction of the Project Manager.

Chance Finds

Custody of Findings: The Contractor shall:

- (a) Take precautions to avoid disturbance of findings and prevent damage.
- (b) Train relevant Personnel on actions for handling such findings.
- (c) Implement actions consistent with the Specification and relevant laws.
- (d) Notify the Project Manager of discoveries and follow instructions for handling.

Possession of the Site



Site Possession: The Employer shall give possession of all parts of the Site to the Contractor. Delays in possession will be considered as a Compensation Event.

Access to the Site

Access Rights: The Contractor shall allow the Project Manager and authorized persons (including Bank staff, consultants, and stakeholders) access to the Site for inspections, audits, and other activities as outlined in the Contract.

Instructions, Inspections, and Audits

Compliance: The Contractor shall comply with instructions from the Project Manager as per applicable laws.

Record Keeping: The Contractor shall keep accurate records and accounts related to the Works.

Inspection and Audit: The Contractor shall permit inspection and audit by the Bank and authorized persons. Non-compliance with inspection and audit rights may lead to contract termination as per GCC Sub-Clause 25.1.

Additional Requirements

Additional specific requirements include:

1. Permits and Approvals

- **GCC/PCC Reference:** None (legal compliance is expected as a minimum).
- The contractor is expected to obtain all necessary permits, consents, and approvals, with the client responsible for obtaining consent from Physical Planning for the works. It is the responsibility of the contractor to comply with any requirements of the licenses, permits, or consents, irrespective of who obtains them.

2. Site Security

- **GCC/PCC Reference:** 29, 18.2, 18.2
- The contractor will implement site security measures, including fencing, security personnel, and surveillance systems, to protect the site from unauthorized access and ensure the safety of the workers and equipment.



3. Site Clearing and Vegetation Removal

- **GCC/PCC Reference:** 16.2, 18.3
- The contractor will clearly mark and protect areas of the site that must be preserved. Any vegetation or tree removal will be minimized, and protective measures will be established to prevent unnecessary damage. Emission and discharge values will adhere to the guidelines set out in the Environmental, Health, and Safety (EHS) guidelines.

4. Chance Finds

- **GCC/PCC Reference:** 19
- If any chance finds are discovered during construction, the contractor must immediately cease work in the affected area and notify the relevant authorities. Work can only resume once proper clearance is given by the authorities.

5. Worker Occupational Health and Safety (OHS)

- **GCC/PCC Reference:** 9.1, 18.1 & 18.2, 9.4, 30.5, 9.3
- In addition to compliance with GCC/PCC 18.1 and 18.2, the Environmental and Social (E&S) Requirements will specify that the Occupational Health and Safety Management (OHSM) plan must describe the Lock-out system to be applied by the contractor during electrical work. The OHSM plan must also include standards for scaffolding, ensuring compliance with recognized safety protocols, and the implementation of the Scaff Tag system. The contractor must provide qualified and experienced key personnel, and worker facilities such as toilets, washrooms, and drinking water must meet required standards. Processes for incident notification and follow-up must be clearly defined.

6. Traffic Management

- **GCC/PCC Reference:** To be detailed.
- The contractor must develop and implement a traffic management plan to manage potential impacts at the site, ensuring safe and efficient traffic flow. This plan will include measures such as signage, traffic control personnel, and scheduling of deliveries to minimize disruption.

7. Worker Training

- **GCC/PCC Reference:** GCC9.4.20 (first paragraph), GCC18.2(g)



- In addition to GCC9.4.20 (first paragraph) and GCC18.2(g), as a minimum the general induction: **General Induction for Construction Workers: Safety, Health and the Environment** (<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. 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:
 - Name and signature (or mark) of trainee
 - Employer/ organization they work for
 - Date of induction training attended

8. Community Health and Safety Plan

- **GCC/PCC Reference:** To be detailed.
- The contractor must adhere to specific community health and safety requirements not covered by existing GCC/PCC. This includes measures to protect the community from construction impacts and to communicate effectively with local residents.

9. Infection Prevention and Control Protocol

- **Inclusion:** This protocol will be annexed and detail measures to control the spread of COVID-19 during construction, including hygiene practices, personal protective equipment, and health monitoring.

10. Medical Waste Management Protocol

- Clear responsibilities for handling medical waste will be established. The design includes waste stores, and additional measures will be incorporated into the SOP for health facilities to ensure compliance with relevant standards.

11. Grievance and Redress Mechanism (GRM)

- The OECS Regional Health Care Project (SMARTing of Health Care Facilities - Dominica) will utilize the established Grievance and Redress Mechanism (GRM) of the Government of the Commonwealth of Dominica's Central Services Unit (CSU). The CSU is responsible for managing Environmental and Social Safeguards for projects implemented in Dominica with support from the World Bank Group.
- The CSU's GRM is designed to ensure that all grievances related to the project are addressed promptly, transparently, and effectively. Stakeholders, including community members, project-affected persons,



and other interested parties, can submit their grievances through multiple channels, such as in-person submissions, written complaints, phone calls, or online forms. The CSU will ensure that all grievances are recorded, assessed, and resolved in a manner that adheres to the principles of confidentiality, non-discrimination, and fairness.

- This mechanism will be integral to the project, ensuring that any concerns or issues arising during the SMARTing of Health Care Facilities are appropriately managed, contributing to the project's overall success and the satisfaction of all stakeholders involved.

Cost Implications for Contractor Responsibilities

- For all actions that fall under the responsibility of the contractor, the costs associated with tools, equipment, processes, and methods necessary to deliver the works in compliance with the specified requirements (including those outlined in the General and Particular Conditions of Contract) will be considered a subsidiary obligation. These costs should therefore be incorporated into the prices quoted for other items in the Bill of Quantities.

Table: Matrix of Control Measures

Table 5 Matrix of Control Measures

ID	Measure/Requirement	When to Implement	How to Implement	Responsibility	Reference
1	Health and Safety Induction Training	Before starting work, and annually	Provide training on safety, health, and environmental management as per General Induction guidelines.	Contractor's Safety Officer	GCC 9.4.20; GCC 18.2(g); General Induction for Construction Workers
2	Structural Integrity Assessment	Prior to and during vertical expansion	Conduct detailed structural assessments and monitoring.	Contractor's Engineer	GCC 16.2; ESMP Guidelines
3	Dust and Noise Control	During demolition and construction activities	Implement dust suppression techniques and noise control measures.	Site Manager	GCC 9.4.20; ESMP Guidelines
4	Electrical Safety Compliance	During electrical upgrades	Follow electrical safety standards and guidelines.	Electrical Supervisor	GCC 9.4.20; Electrical safety checklist
5	Waste Management Best Practices	During waste disposal upgrade	Implement and monitor waste management procedures and practices.	Waste Management Officer	GCC 9.4.20; Waste management plan
6	Accessibility and Safety in Redesigns	During redesign and construction	Ensure compliance with accessibility standards and safety protocols.	Architect/Project Manager	GCC 9.4.20; Accessibility design plan
7	Temporary Measures for Patient Management	During Emergency Department redesign	Implement temporary patient management strategies to minimize disruption.	Facility Manager	GCC 9.4.20; Design and implementation plan
8	Installation and Maintenance of PV System	During PV system installation	Follow installation guidelines and maintain electrical safety standards.	Contractor's Technician	PV system installation guidelines
9	Safe Relocation Procedures	During relocation of battery storage	Ensure safe procedures are followed for relocation.	Site Supervisor	GCC 9.4.20; Relocation plan

Construction Phase Mitigation Measures and Monitoring Plan: OECS Smart Health Centre Project - Mahaut

Table 6 Construction Phase Mitigation Measures and Monitoring Plan

Project Activities	Potential Impacts	Mitigation Measures	Performance Indicators	Monitoring Measures	Monitoring Frequency	Monitoring Responsibility
All Construction Activities: Safety Risks	Injuries, accidents, and exposure to hazardous conditions.	Ensure the use of appropriate PPE, engage and employ competent personnel for assigned tasks, conduct safety training, and use equipment that minimizes safety risks.	Compliance with PPE use, safe work practices, zero incidents/accidents, and adherence to OHS protocols.	Monitoring of PPE usage, personnel qualifications, safety training records, incident/accident reports, and OHS audits.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
All Construction Activities: Social Impacts	Forced labor, child labor, restrictions on freedom of expression, gender issues, and SEA/SH risks.	Enforce strict adherence to labor laws prohibiting forced and child labor, uphold freedom of expression, address gender issues, and implement SEA/SH prevention measures.	Zero cases of forced labor, child labor, SEA/SH incidents, and violations of freedom of expression.	Regular audits of labor practices, social compliance checks, SEA/SH incident reporting, and GRM records.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
All Construction Activities: Natural Hazards	Disruptions and damage due to natural hazards (e.g., floods, landslides, hurricanes).	Conduct a natural hazard risk assessment, develop and implement an Emergency Response Plan, and use resilient construction techniques to minimize impacts from natural hazards.	Effective natural hazard preparedness, minimal disruption or damage from natural events, and well-implemented Emergency Response Plans.	Monitoring of Emergency Response Plans, natural hazard risk assessments, and inspection of hazard-resilient construction measures.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
All Construction Activities: Incidents and Accidents	Injuries or fatalities among community members or project staff, and	Establish a robust incident and accident reporting and management system/Emergency Response Plan, provide immediate response and care, conduct thorough	Timely incident reporting, effective response to incidents, thorough investigations, and successful	Review of incident reports, investigation records, corrective action	Contractor – As prescribed by GoCD;	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and

Project Activities	Potential Impacts	Mitigation Measures	Performance Indicators	Monitoring Measures	Monitoring Frequency	Monitoring Responsibility
involving members of the Community and/or Project Staff	inadequate incident response.	investigations, and implement corrective actions to prevent recurrence.	corrective actions, all integrated with OHS and CHS protocols.	logs, and integration with OHS and CHS audits.	PIU/GoCD – At key stages of construction phase and as otherwise required.	Social Safeguard Officers
All Construction Activities: Occupational Health and Safety (OHS) and Community Health and Safety (CHS)	Health and safety risks to workers and surrounding communities, including dust, noise, and exposure to hazardous materials.	Develop and implement comprehensive OHS and CHS plans, ensure proper safety protocols, dust suppression methods, noise reduction techniques, and secure site perimeters to protect the community. The General Induction for Construction Workers: Safety, Health and the Environment (https://www.wbgkggf.org/node/3823), shall be provided as training to all Contractor’s Personnel.	Compliance with OHS and CHS standards, minimal health impacts, and secure construction sites.	Regular OHS and CHS audits, site inspections, monitoring of dust/noise levels, and community feedback through GRM.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
All Construction Activities: Grievance and Redress Mechanism (GRM)	Unaddressed grievances related to social issues, labor practices, SEA/SH, and community concerns.	Ensure that CSU/PIU GRM remains confidential and accessible for addressing grievances related to social issues, labor practices, SEA/SH, and community concerns, with timely resolution and follow-up.	Efficient grievance resolution, high stakeholder satisfaction, and minimal unresolved grievances.	Review of GRM records, grievance resolution timelines, and follow-up actions.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
Expansion of Existing Building Vertically	Structural instability, dust, noise, safety hazards	Conduct structural assessments, implement dust control, noise barriers, and safety protocols.	Compliance with structural safety standards and minimal dust and noise levels	Regular site inspections, review of safety records and compliance with dust/noise control measures	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers



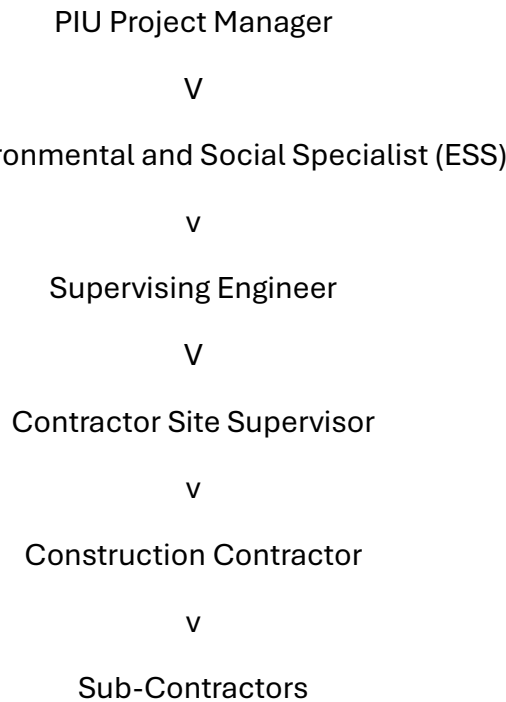
Project Activities	Potential Impacts	Mitigation Measures	Performance Indicators	Monitoring Measures	Monitoring Frequency	Monitoring Responsibility
Retrofitting of Existing Building	Disruption to existing services, safety risks, and temporary environmental impact.	Plan and execute retrofitting with minimal disruption, ensure safety measures are in place, manage waste effectively, and ensure ongoing healthcare services are not impeded.	No service disruptions, adherence to safety measures, and unimpeded healthcare services.	Inspections, service disruption reports, healthcare service access logs, and CHS monitoring.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
Installation of PV System (10Kw)	Potential hazards during installation, energy efficiency issues.	Follow installation guidelines, ensure proper maintenance and operation, perform regular inspections, and maintain safe working conditions during installation.	Proper functioning of the PV system, adherence to installation standards, and accident-free installation.	Inspection of PV system installation, maintenance records, energy output checks, and incident/accident reports.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
Installation of Rainwater Catchment	Potential for improper installation, water quality issues.	Ensure proper installation as per design specifications, perform regular maintenance, and monitor water quality regularly.	Functionality of the catchment system, adherence to water quality standards, and secure system installation.	Regular inspections, water quality testing, system security checks, and CHS monitoring.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
Demolition of Walls	Dust, noise, structural risks, waste management issues, hazardous waste exposure, and demolition material segregation.	Implement dust control measures, noise control, proper handling, and disposal of hazardous waste, and ensure the segregation and proper disposal of demolition material.	Dust and noise levels within legal limits, effective waste segregation and disposal, and safe handling of hazardous waste.	Monitoring of dust and noise levels, hazardous waste handling records, waste management records, and CHS audits.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers

Project Activities	Potential Impacts	Mitigation Measures	Performance Indicators	Monitoring Measures	Monitoring Frequency	Monitoring Responsibility
Erection of Walls	Safety hazards, dust, and noise.	Ensure proper safety protocols, dust suppression methods, noise reduction techniques, and unimpeded healthcare services.	Compliance with safety protocols, controlled dust/noise levels, and safe access to healthcare services.	Site inspections, monitoring of safety protocols, dust/noise control measures, and healthcare access logs.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
Electrical Upgrades	Electrical safety hazards, potential service interruptions.	Adhere to electrical safety standards, perform regular checks, ensure minimal disruption to existing services, and provide clear reporting on incidents.	Compliance with electrical safety standards, minimal service interruptions, and effective incident reporting.	Regular inspections, review of electrical safety records, and incident/accident reports.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers
Waste Disposal Upgrade	Environmental impact, potential for improper waste management, and biomedical/hazardous waste disposal issues.	All demolition waste must be segregated, with recyclable and reusable items managed accordingly. Waste generated from land clearance and excavation must be disposed of at approved dumping sites.	Proper waste disposal, segregation of hazardous/biomedical waste, and complete waste management records.	Monitoring of waste disposal practices, waste segregation, and disposal records, with regular OHS and CHS audits.	Contractor – As prescribed by GoCD; PIU/GoCD – At key stages of construction phase and as otherwise required.	Contractor; Project Monitoring Team-GoCD; CSU/PIU Environmental and Social Safeguard Officers



G Approval, Key Roles and Implementation:

Project Management Framework: Below is the organizational chart for the project, detailing the key roles and their responsibilities to ensure the successful implementation of the Environmental and Social Management Plan (ESMP).



Roles and Responsibilities

1. PIU Project Manager

- Provides overall strategic direction and decision-making for the project.
- Ensures alignment with project goals and compliance with funding requirements.

2. PIU Environmental and Social Specialist (ESS)

- Provides technical support and guidance on environmental and social safeguards.
- Ensures that the ESMP is integrated into project planning and execution.

3. Supervising Engineer

- Supervising Engineer is responsible for monitoring Contractor performance ensuring that all work is in accordance with contract requirements, including ESHS.



- Conducts regular assessments and reports on ESMP compliance.
- Monthly reporting to the PIU Project Manager.
- Oversees the entire project implementation.
- Ensures that bidding documents and works contracts meet ESMP requirements.
- Monitors the contractor's compliance with the ESMP.
- Coordinates with the Environmental and Social Specialist for ESMP approval and implementation.

4. Contractor Site Supervisor

- Manages day-to-day site activities.
- Ensures that the Construction Contractor and sub-contractors adhere to the ESMP and safety protocols.
- Reports site issues and progress to the PIU Project Manager.

5. Construction Contractor

- Executes construction works as per the contract specifications.
- Implements environmental and social safeguards as outlined in the ESMP.
- Reports progress and compliance to the Contractor Site Supervisor.

6. Sub-Contractors

- Carry out specific tasks as assigned by the Construction Contractor.
- Comply with all ESMP requirements and safety standards.
- Report to the Site Supervisor on task completion and compliance issues.

Approval process for the ESMP by relevant authorities

The ESMP must be approved by the Client i.e. the Ministry of Health, Wellness and Social Security, more specifically the OECS Regional Health Project – Project Implementation Unit (PIU).

Additionally, it is imperative that the ESMP is in place and approved before any bidding documents are issued.



H Reporting, Documentation and Recordkeeping:

Supervising Engineer Reporting

The Supervising Engineers reporting requirements will follow the guidelines established in the World Bank's Standard Procurement Document (SPD) for Small Works. These requirements ensure that all aspects of the Environmental and Social Management Plan (ESMP) are addressed throughout the project execution. The Supervising Engineer must provide monthly reports to the PIU Project Manager detailing the following:

- **Progress on ESMP Implementation:** Updates on the actions taken to comply with the ESMP requirements.
- **Environmental and Social Safeguard Measures:** Documentation of the measures implemented to address environmental and social risks.
- **Incidents and Non-Compliance:** Reporting of any incidents or deviations from the ESMP, along with corrective actions taken.
- **Monitoring and Evaluation Results:** Data and findings from environmental and social monitoring activities.

Contractor Reporting

The contractor shall adhere to the reporting requirements outlined in Appendix B of the World Bank Standard Bidding Documents (SBD). This includes the submission of periodic reports to the Supervising Engineer (or designated authority), detailing the contractor's compliance with environmental, social, health, and safety obligations under the contract. Key reporting requirements include:

1. Monthly Progress Reports:

- Summary of works completed, including adherence to project timelines and milestones.
- Updates on compliance with the Environmental and Social Management Plan (ESMP), including monitoring results for air, noise, water quality, and waste management.
- Records of incidents, near-misses, and accidents, including investigations and corrective actions undertaken.
- Grievance redress activities, including the number of grievances received, resolved, and outstanding, with a focus on confidentiality and resolution of SEA/SH-related complaints.



2. Environmental and Social Safeguards Compliance Reports:

- Evidence of implementation of occupational health and safety (OHS) measures, including use of PPE and worker training records.
- Community health and safety (CHS) measures undertaken, such as traffic management and public awareness campaigns.
- Records of consultations and stakeholder engagement activities, including attendance lists and key feedback received.

3. Site Monitoring and Inspection Reports:

- Results of regular site inspections and audits, including non-conformities identified and corrective actions implemented.
- Details of environmental monitoring activities, such as sediment control, dust suppression, and waste disposal.

4. Emergency and Incident Reporting:

- Immediate notification of serious incidents, including fatalities, severe injuries, or environmental spills, followed by a detailed report within 48 hours.
- Documentation of the emergency response, lessons learned, and measures to prevent recurrence.

5. Final Completion Report:

- Summary of overall compliance with environmental and social commitments during the project lifecycle.
- Detailed records of handover and demobilization activities, including site restoration and waste removal.

The contractor is responsible for ensuring that all reports are prepared in accordance with World Bank standards, are supported by accurate data and evidence, and are submitted within the specified timelines. Non-compliance with reporting requirements may result in penalties or withholding of payments.

PIU Compliance Reporting

The Project Implementation Unit (PIU) is responsible for preparing and submitting compliance reports on project implementation including the ESMP to the World Bank. The frequency and format of these reports will be as outlined in the Financial Agreement. The key elements of the PIU's compliance reports include:



- **Summary of Contractor Reports:** A consolidated overview of the contractor's reports on ESMP implementation.
- **PIU Monitoring Activities:** Details of the PIU's own monitoring activities, including site inspections and audits.
- **Compliance Status:** Assessment of the project's overall compliance with the ESMP, highlighting any areas of concern or non-compliance.
- **Corrective Actions:** Description of any corrective actions taken or planned to address non-compliance issues.
- **Stakeholder Engagement:** Information on stakeholder engagement activities and any feedback received from affected communities. A minimum of four (4) consultations will be conducted within each calendar year during the construction phase. Additional engagement methods will include public meetings, focus group discussions, one-on-one interviews, and information dissemination through various media (e.g., newsletters, community notice boards, social media).

I Annexes

- (i) Verification (ESHS) Checklist
- (ii) Contactor Code of Conduct



2.5	Is stockpiled soil & tarrish contained and away from waterways					
2.6	Are any exposed hillsides revegetated to avoid erosion/ landslides /slumps/collapse					
3.0	Noise Control					
3.1	Any noise mitigation measures adopted (e.g. use noise barrier/enclosures					
3.2	Do air compressors and generators operate with doors closed					
3.3	Is idle plant/equipment turned off or throttled down?					
3.4	Are horns used excessively? (near communities and school zones)					
3.5	Are vehicles traversing community equipped with noise reducing silencers?					
3.6	Is work limited to regular working hours?					
4.0	4.0 Waste Management					
4.1	Is the site & drains kept clean and tidy? (litter free, good housekeeping)					
4.2	Are containers provided for personal waste (food waste) collection? Are they disposed of appropriately and timely?					
4.3	Are construction wastes collected and disposed of properly (segregated into metal, plastic pipes, reinforced concrete, large trees, soil)?					
4.4	Are permits, agreements, schedules shared for liquid (sewerage) & solid waste disposal					
4.5	Are chemical wastes, if any, collected and disposed of properly					
4.6	Are garbage bins available and waste disposed of regularly/avoidance of extended storage of waste?					
5.0	Portable Equipment/ Electricals					
5.1	Safety guards mounted properly					
5.2	Electrical cords and ends without cuts/burns/faults					
5.3	Cords running away from working equipment, wet/damp area (ravine/river water) and not a tripping hazard					
5.4	Fuses/ground rods/surge protectors/trip device used					
5.5	Use by competent/certified persons					
5.6	Overhead lines are considered energized and avoided					
6.0	Emergency Items Available					
6.1	Emergency response procedure (ERP) outlined for specific areas and known to employees with drills conducted?					
6.2	Fire Extinguishers & First Aid Kits easily accessible					
6.3	Adequate number of fire extinguishers at hand (100ft)					



6.4	First Aid eye/face rinse available					
6.5	First Aid Responder/CPR Certified Staff					
6.6	Emergency vehicle available					
6.7	Emergency phone numbers posted					
6.8	Is there a mechanism for registering and reporting accidents & injuries?					
6.9	Are environmental and H&S incidents being reported?					
6.10	Are incidents investigated (RCA) and measures in place to prevent recurrence (PAP)					
7.0	7.0 Confined Space Work					
7.1	Additional PPE used for confined space: hard hat, gloves, respirator, goggles, ear protection					
7.2	Extractor/ventilator use?					
7.3	Work area properly lit					
7.4	No lone working					
7.5	Most practical egress and exit established?					
8.0	Working At Height					
8.1	Ladder/scaffolding/guardrails used with safe access					
8.2	Ladders rungs/scaffold in good condition					
8.3	Ladders stopped at base & tied at top					
8.4	Planks nailed/secured/wider than 1ft/rigid					
8.5	Scaffolding erected properly: cross bracing/tied to structure/footing					
8.6	Scaffolding- inspected at beginning of day and before heavy use					
8.7	Scaffolding - guardrails used at 6ft &/or where necessary					
8.8	Harness worn at heights above 6ft and are anchored/positioned properly					
8.9	Adequate prevention of falling materials					
9.0	Biodiversity Management					
9.1	Are measures undertaken to reduce project footprint? (excavations for road widening and culverts)					
9.2	Is hunting of wildlife and praedial larceny prohibited on project and especially within adjoining forested area?					
9.3	Is field staff trained on mitigation measures for biodiversity protection?					
9.4	Are markers erected to demarcate project area for vegetation removal?					
9.5	Are night/security lights, if any, facing downwards and within height of 8ft to reduce impact on wildlife during any night time works					



9.6	All imported equipment and machinery inspected for invasive species before use?					
10.0	10. Handling and Storage of Material					
10.1	Materials stored, stacked and labelled properly					
10.2	Materials stored away from edges					
10.3	Passageways cleared					
10.4	Are oil drums and plants/equipment provided with drip trays					
10.5	Is it cleaned- up immediately?					
10.6	Site neat and orderly.					
11.0	Dangerous Substances					
11.1	Are stored in proper containers, right temperature and in correct location (away from waterways)					
11.2	Are storage containers labeled correctly with warning signs visible					
11.3	Are handled with the correct PPE (splash goggles, apron, gloves, respirator)					
11.4	Will not cause grave environmental damage if spilled where stored/transported (bunds well managed/diesel truck emergency spill procedure documented and trained.)					
11.5	If there is any spillage it is cleaned up immediately? Are there spill kits available?					
11.6	MSDS's available to staff (Sealants, bitumen and bituminous paint etc.)					
11.7	Staff trained on handling, storage, emergencies of these substances					
12.0	12. Worker Welfare, Health & Safety					
12.1	Drinking water available.					
12.2	Toilets available: functional/clean					
12.3	Are there sufficient toilets? (for no.'s and genders)					
12.4	Locker room/rest area sufficient/cleaned					
12.5	Sanitization & wash station available and implemented					
12.6	Social distancing as much as possible					
12.7	Covid -19 testing (and retesting) done upon suspicion of infection					
12.8	Are sufficient PPEs being used? (helmet, boots, vests, goggles)					
12.9	Are there mechanisms for registering worker grievances? Forms available?					
12.10	Are JHA's performed for specific work tasks (culvert casting, bridge construction, working with heavy equipment)					
12.11	Are employees trained to use equipment?					
12.12	Are safety trainings/meetings/inductions recorded and shared?					



12.13	Easy and safe access to work areas? (steps/ladders/hand rails)					
12.14	Are proper safe zones established?					
12.15	Are slip, trip and impalement hazards eliminated as much as practicable?					
13.0	Traffic Management					
13.1	Sufficient and well positioned traffic wardens and spotters for heavy equipment and trucks					
13.2	Traffic wardens and spotters sufficiently trained (efficient communication) with appropriate tools					
13.3	Provision of clear and early warning of obstructions in the roadway					
13.4	Provision of clear directions relating to decisions/actions required by road users					
13.5	Site route unblocked/uninterrupted to public vehicles (ambulances) and pedestrians					
13.6	Are traffic delays kept to a minimal?					
13.7	Pedestrian routes created as much as possible					
13.8	Speed limits properly observed by site traffic					
13.9	Vehicles and equipment load/capacity limits observed					
13.10	Barricades, barriers and channeling devices used appropriately on ground/at excavations					
13.11	Equipment and material stockpiled at road sides do not encroach onto active roadway and are highlighted and barricaded especially at night					
13.12	Suitable/legible signage					
14.0	14. General Safety					
14.1	Highlights of Contactor's ESHS inspections shared?					
14.2	Log of Safety meetings shared?					
14.3	Weather monitored for poor work conditions (excess mud, flooding of waterways, wind)					
14.4	Vehicle inspection logs shared?					
14.5	No smoking rule enforced around hazardous chemicals and fuel sources					
14.6	No burning on site					
14.7	No trespassing onto adjoining properties					



Appendix 2 Code of Conduct for Contractor's Personnel (ES) Form

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

Note to the Employer:

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

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

Note to the Bidder:

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

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

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [enter name of Contractor]. We have signed a contract with [enter name of Employer] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment. This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “**Contractor's Personnel**” and are subject to this Code of Conduct.

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

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



REQUIRED CONDUCT

Contractor's Personnel shall:

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



RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly.

This can be done in either of the following ways:

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

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

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

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

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

FOR CONTRACTOR'S PERSONNEL:

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

Name of Contractor's Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date: (day month year): _____

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



ATTACHMENT 1 TO THE CODE OF CONDUCT FORM

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

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

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

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

(2) Examples of sexual harassment in a work context

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