**Jamaica Education Project (JEP)**

**Preliminary Environmental and Social Management Plan (PESMP)**

**For the PROPOSED**

**STEM school At Minard, St. Ann**

**March 31, 2025**

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# Acronyms

**CDC:** Community Development Committee

**CERC**: Contingent Emergency Response Component

**ECD**: Early Childhood Development

**EMIS**: Education Management Information System

**ESF**: Environmental and Social Framework

**ESSO:** Environmental & Social Safeguards Officer

**PESMP**: Preliminary Environmental and Social Management Plan

**ESS**: Environmental and Social Standards

**GMEL:** Gender Monitoring Evaluation Learning

**GOJ**: Government of Jamaica

**GRM**: Grievance Redress Mechanism

**JEP**: Jamaica Education Project

**JTC**: Jamaica Teaching Council

**MoEY**: Ministry of Education and Youth

**NEPA**: National Environment and Planning Agency

**NHT:** National Housing Trust

**NSC**: National Standards Curriculum

**NSWMA**: National Solid Waste Management Authority

**PATH**: Programme of Advancement Through Health and Education

**PIU**: Project Implementation Unit

**PPE**: Personal Protective Equipment

**SEA/SH**: Sexual Exploitation, Abuse, and Sexual Harassment

**STEAM**: Science, Technology, Engineering, Arts, and Mathematics

**STEM**: Science, Technology, Engineering, and Mathematics

**TTL**: Task Team Leader

# 1.0 Executive Summary

The Jamaica Education Project (JEP) financed (US$30 million) by the World Bank, is being implemented by the MoEY and aims to improve teaching and learning conditions in secondary education, and the use of information for decision-making in the education system. The project comprises five (5) components:

1. Strengthening Teaching and Learning in Secondary Education.
2. Supporting Quality and Resilient School Infrastructure.
3. Strengthening Information Systems and Strategies for Student Retention.
4. Providing Technical Assistance (TA), Strengthening Institutional Capacity, and Project Management.
5. Establishing a Contingent Emergency Response Component for rapid response to natural disasters or crises.

Against this background, the MoEY has prepared this Preliminary Environmental and Social Management Plan (PESMP), to assess project activities and identify possible associated environmental and social risks and impacts associated with the construction of a STEM school. The PESMP ensures that all Project activities are conducted sustainably and inclusively, in compliance with Jamaican regulations and the World Bank’s **Environmental and Social Framework (ESF)**. Specifically, the PESMP integrates key **Environmental and Social Standards (ESS)** to guide project:

* **ESS1: Assessment and Management of Environmental and Social Risks and Impacts** – To assess, manage and monitor environmental and social risks and impacts associated with each stage of the project.
* **ESS2: Labor and Working Conditions** – Safeguards the rights of workers by ensuring safe working environments, fair treatment, and access to a grievance mechanism.
* **ESS3: Resource Efficiency and Pollution Prevention** – Promotes efficient resource use and pollution control to minimize environmental impacts during construction and operations.
* **ESS4: Community Health and Safety** – Protects local communities from risks related to construction activities, such as noise, dust, and traffic disruptions.
* **ESS5:** **Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement** – Prevents displacement and ensures fair compensation if land use restrictions arise.
* **ESS8:** **Cultural Heritage** – Safeguards tangible and intangible cultural heritage, including procedures for chance finds during construction.
* **ESS10:** **Stakeholder Engagement and Information Disclosure** – Ensures inclusive, meaningful consultation with stakeholders, particularly vulnerable groups and provides transparent communication throughout the project lifecycle.

The project is not complex and the PESMP identifies the potential environmental and social risks and impacts that will occur during the construction phases and are considered temporary, short term, localized, and are classified as low to moderate risk **(Sections 4 and 5)**. Most of the direct impacts can occur within the project site’s sphere of influence. In addition, the PESMP also includes a Monitoring and Evaluation Plan with measurable indicators, timelines, and clearly defined roles and responsibilities to ensure effective implementation.

The PESMP will be required to be updated to an ESMP once the designs for the STEM school have been completed. In addition, the ESMP will need to be reviewed and cleared by the World Bank and included in the MoEY bidding documents which will be adopted by the contractor to prepare a Contractor Environmental and Social Management Plan (C-ESMP), incorporating the recommendations of the project’s ESMP.

# 2.0 Introduction

The Ministry of Education and Youth (MoEY) has prioritized improving Science, Technology, Engineering, Arts, and Mathematics (STEAM) education at the secondary level, as recommended in the Jamaica Education Transformation Report of 2021. This includes the development of six (6) Science, Technology, Engineering, and Mathematics (STEM) schools and one (1) STEAM school at the secondary level. A STEAM-infused curriculum will be introduced to strengthen competencies in STEAM subjects, supported by enhanced learning environments, resources, and instruction.

Under the Jamaica Education Project (JEP) financed (US$30 million) by the World Bank, the MoEY aims to improve teaching and learning conditions in secondary education, and the use of information for decision-making in the education system. The project comprises five (5) components:

1. Strengthening Teaching and Learning in Secondary Education.
2. Supporting Quality and Resilient School Infrastructure.
3. Strengthening Information Systems and Strategies for Student Retention.
4. Providing Technical Assistance (TA), Strengthening Institutional Capacity, and Project Management.
5. Establishing a Contingent Emergency Response Component for rapid response to natural disasters or crises.

Against this background, the MoEY has prepared this Preliminary Environmental and Social Management Plan (PESMP) to assess project activities and identify potential associated environmental and social risks and impacts related to the construction of a STEM school. The PESMP will guide the environmental and social management practices and mitigation measures that should be considered and adopted during the construction of the STEM school, ensuring compliance with Jamaican regulations and the World Bank’s ESF requirements. This PESMP presents the baseline conditions of the proposed site and will be updated once the designs for the STEM school have been finalized and approved by the MoEY.

## 2.1 Project Location and Description

A map of a land

AI-generated content may be incorrect.

Figure 1: Aerial Image of the exact location of the land parcel

Minard Estate is known for the work of Dr. Thomas Lecky, a renowned Jamaican agricultural scientist who developed Jamaica's indigenous cattle breeds, including the Jamaica Red Poll, Jamaica Black, and Jamaica Hope. The proposed site located in Minard, St. Ann and is owned by the National Housing Trust (NHT). Twenty (20) acres of the said Minard property have been identified and the MoEY have entered into an agreement with the NHT for transfer of ownership. The selected location for the school is part of a broader development plan aimed at transforming the Browns Town, St. Ann area and its environs. Brown’s Town is known as a busy peri-urban centre known for its rich history, vibrant migrant economy and educational institutions. The town serves as a commercial hub for surrounding farming communities as well as home to very prominent schools such as St. Hilda’s Diocesan High, York Castle High & Brown’s Town Community College making it an educational nucleus in St. Ann.

The proposed school site is located on undeveloped land and based on preliminary assessments, there are no persons living or conducting livelihood generating activities on or near the site. Vegetation on the site can be classified as dry limestone forest with no rare or endemic flora and fauna. The proposed construction works aim to enhance the educational infrastructure by developing a modern, resilient, and inclusive learning environment. These works will focus on building new facilities to support STEM education, improving teaching and learning spaces, and ensuring compliance with environmental, safety, and accessibility standards. The project will involve site preparation, structural development, and installation of essential systems, followed by finishing works and landscaping to deliver a fully functional and sustainable school environment. The conceptual design for the proposed includes a modern, multi-story structure designed to accommodate 600-800 students while prioritizing energy efficiency, accessibility, and sustainability. It will feature specialized STEM classrooms, flexible learning spaces, science and technology labs, and collaborative work areas to enhance hands-on, project-based learning. Ancillary facilities will include:

* Sewage treatment system to support sustainable waste management.
* Adequate parking facilities for staff, visitors, and school buses.
* Sport and recreational areas, including indoor and outdoor activity spaces.
* Safe and accessible entry points, ensuring security and efficient movement.
* Green spaces to promote environmental sustainability and outdoor learning.

Once a design firm is selected has developed the detailed architectural drawings and engineering plans, the PESMP will be updated to an ESMP which will be included in the MoEY bidding documents to facilitate the potential contractors to prepare a Contractor – Environmental and Social Management Plan (C-ESMP) or Management Strategies Implementation Plan.

# 3.0 Policies, Legislations and Regulations

The project will be processed under the World Bank’s Environmental and Social Framework (ESF). At the same time, it will follow all the relevant national policies and legislations related to environmental and social issues.

## 3.1 Relevant National Legislation and Regulations

Based on the preliminary project details and potential environmental and social risks and impacts associated with the conceptual design, the relevant Government of Jamaica (GOJ) policies, legislation, regulations, and environmental standards pertaining to this project were reviewed. The review examined those policies, legislation and regulations governing environmental quality, health and safety, protection of sensitive areas, protection of endangered species, site selection and land use control at the regional, national, and local levels that relate to or should be considered by MoEY in the policies, laws, and regulations framework of the project (See Table 1). The list is not exhaustive but highlights the laws and regulations that should be considered for the project.

Table : Relevant National Legislations and Regulations and Possible Link to the Project

| Legislation/Regulation | Applicability to the Project | Entity Responsible |
| --- | --- | --- |
| The Natural Resources Conservation Authority (NRCA) Act (1991) | The NRCA Act provides for the management, conservation, and protection of the Natural resources and it’s the main Environmental Act for Jamaica. The proposed redevelopment may require an EIA and permit. | National Environment and Planning Agency (NEPA) |
| The Natural Resources Conservation Authority (Permits and Licenses) (Amendment) Regulations (2015) | Under the NRAC Act of 1991, the NRCA is authorized to issue, suspend and revoke permits and licenses if facilities are not in compliance with the environmental standards and conditions of approval stipulated. | NEPA |
| The Natural Resources Conservation Authority (Wastewater and Sludge) Regulations, (2013) | These regulations require that separate licenses be acquired to construct, operate, and discharge effluent for a wastewater or sewage treatment plant. If a permit is granted, the developer would be required to monitor the effluent quality based on the frequency outlined in the terms and conditions of the license and submit reports accordingly. | NEPA |
| The Natural Resources Conservation Authority (Air Quality) Regulations, (2006) | These Regulations will apply to any air pollutant emitted such as total suspended particulate matter, dust, smoke, fumes, etc. | NEPA |
| The Town and Country Planning Act (1999) | The Act establishes area-specific standards for land use, density, and zoning. | NEPA |
| Jamaica National Heritage Trust Act (1985) | This Act provides for the protection of important areas, including the numerous monuments, forts, statues, buildings of historic and architectural importance in Jamaica. The Jamaica National Heritage trust (JNHT) designates what is a national monument which may be located above or below ground and will guide the preservation or removal of chance finds. These chance finds may be encountered during the pre-construction and construction phases of the project. | Parish Council |
| The National Solid Waste Management Authority Act (2000) | The Act provides for the regulation and management of solid wastes. Solid/ construction waste generated during the construction phase will require proper collection and disposal. The NSWMA should be contacted for identifying approved disposal site(s). | National Solid Waste Management Authority (NSWMA) |
| Occupational Safety and Health Act (2017) | The Act is to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work by protecting workers against discrimination or harm to their safety, health, or welfare; providing fair and effective workplace representation; promoting the provision of advice and training in relation to occupational safety and health; and ensuring compliance and enforcement measures. | Environmental Health Unit – Ministry of Health and Wellness |
| Public Health Act (1974) | This Act governs all matters concerning Vector Control, Food Safety, Occupational Safety and Health, Port Health, and Quarantine, Building and Subdivision Plans (approving appropriate sewage systems), Water and Wastewater (regulating existing systems), Waste Management (include medical, hazardous, and other solid waste e.g., domestic), Institution Health and Environmental Sanitation. | Environmental Health Unit – Ministry of Health and Wellness |

## 3.2 The World Bank’s Environmental and Social Framework (ESF)

The World Bank Environmental and Social Framework (ESF) sets out the requirements for the MoEY. Detailed information on the Bank’s ESF is available at: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>. The Environmental and Social Standards (ESSs) under the ESF explain the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with project activities. The Project's Environmental and Social Risk Classification (ESRC) is Moderate. Seven of the ten ESSs of the ESF have been identified as relevant for the project:

* ESS1: Assessment and Management of Environmental and Social Risks and Impacts
* ESS2 Labour and Working Conditions
* ESS3 Resource Efficiency and Pollution Prevention and Management
* ESS4 Community Health and Safety
* ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
* ESS8: Cultural Heritage
* ESS10: Stakeholder Engagement and Information Disclosure

MoEY is also required to apply the relevant requirements of the World Bank Group Environmental, Health and Safety Guidelines (EHSGs). The EHSGs are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) and are referred to in the World Bank’s Environmental and Social Framework. The EHS can be accessed from the following link:

<https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines>.

# 4.0 Anticipated Environmental and Social Risks & Impacts

The construction phases will generate environmental and social risk and impacts common to civil works. These are temporary, localized, moderate, and can be effectively mitigated or prevented using standard best practices. Some of the potential risks and impacts include:

* Dust and noise emissions affecting students, teachers, and nearby communities.
* Risk of exclusion of students with disabilities and at-risk youth if inclusivity measures are not adequately implemented.
* Contamination from improper waste disposal during site preparation and construction.
* Temporary disruption to nearby community activities due to construction works.
* Health and safety risks for workers and surrounding residents.
* Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risks, including workplace harassment and risks to vulnerable groups in surrounding communities.

# 5.0 Mitigation and Management Measures

The project will adhere to the World Bank’s ESSs and Jamaica’s national regulations, ensuring that all activities align with ESHS standards. Key measures include:

* Environmental Protection: Implementing dust and noise control measures, ensuring proper waste disposal, and incorporating climate-resilient and accessible designs.
* Occupational Health & Safety: Compliance with national building codes, use of personal protective equipment (PPE), and on-site safety training for all workers.
* Social Welfare & Inclusion: Minimizing disruptions to local communities, ensuring accessibility, and incorporating stakeholder feedback in project planning.
* SEA/SH Prevention: Enforcing a zero-tolerance Code of Conduct, conducting SEA/SH awareness training, ensuring separate, well-lit facilities for workers, and implementing a confidential grievance mechanism.

The project is in the planning and design phase, with the MoEY in the process of tendering for a design and build consultant. This stage is critical for integrating environmental, social, and climate resilience considerations into the project’s design and implementation. Once construction begins, the project must comply with the World Bank’s ESSs and Jamaica’s environmental regulations to ensure sustainability, safety, and inclusivity. Additionally, the PESMP/ESMP will inform the preparation of C-ESMP by the Design and Build consultant. The PESMP/ESMP must be reviewed and cleared by the World Bank and included in the MoEY bidding documents. The MoEY/PIU will be responsible for reviewing and approving the C-ESMP. The anticipated environmental and social risks and proposed mitigation measures are presented in **Table 2**.

Table : Impact Mitigation Measures Matrix

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Risk Category** | **Risk Description / Activity** | **Potential Impacts** | **Mitigation Measures** | **Responsibility** | **Monitoring Requirements** |
| **Environmental Risks** | | | | | |
| Infrastructure Design | Risk: Neglected Climate Adaptation Measures | Increased infrastructure vulnerability to climate change | Climate-proof infrastructure designs; integrate green infrastructure elements (e.g., permeable surfaces, vegetation buffers). | Contractor (Design & Build Firm) | -Inspection of climate-resilient design elements during construction and post-construction. |
| Pre-Construction/Site Preparation/Community Engagement | Community health and safety risks | Accidents community hazards | - Erect barriers and signage/hoarding around the construction site. - Notify local communities of high-risk activities, such as blasting. - Establish an emergency response plan in collaboration with local authorities. | Contractor  PIU-ESSO | - Monthly community engagement reports.  - Community feedback on perceived safety improvements. |
| Site Preparation and Construction (Earthworks Excavation, Vegetation Clearance, Trenching and Blasting) | Risk: Noise pollution from machinery and construction activities | Disturbance to local communities | - Schedule noisy activities during daytime hours.  -Use noise-dampening equipment and install mufflers on machinery. - Conduct periodic noise level monitoring to ensure compliance with NEPA guidelines | **Contractor** PIU-ESSO, Jr. Project Engineer | - Weekly noise level monitoring during construction. - Community feedback on noise disturbances. |
| Air Pollution | Risk: Dust and emissions from construction activities | Health hazards, environmental degradation | - Regularly water construction sites and unpaved roads.  - Cover construction materials during transport.  - Use low-emission equipment.  - Monitor air quality for compliance with NEPA standards.  - Provide at least two weeks’ prior notice to communities before construction begins. | Contractor, PIU-ESSO, Jr. Project Engineer | - Biweekly air quality monitoring.  - Inspection of dust suppression measures during site visits. |
| Soil Erosion | Risk: Uncontrolled vegetation clearance and excavation | Loss of topsoil, increased sedimentation | - Clear only small, designated areas at a time.  - Replant cleared areas immediately after construction.  - Install sediment controls at property boundaries, particularly in drainages. | Contractor, PIU-ESSO | - Site inspections to ensure soil stabilization measures are implemented. |
| Solid and Hazardous Waste Management | Risk: Construction waste accumulation | Pollution, health risks | - Store waste in designated areas.  - Reuse or recycle construction materials where feasible.  - Dispose of waste at NSWMA-approved sites.  - Cover waste to prevent dust and erosion. | Contractor, NSWMA | - Waste disposal logs and receipts from approved sites.  - Monthly inspections of waste storage and disposal areas. |
| Environmental and Occupational Health Risks | Risk of Exposure to and improper management of hazardous materials and waste | Improper handling, storage, or disposal of hazardous materials can pose serious health risks to workers, contaminate soil and water sources, and result in fire or chemical hazards. | - Identify and classify all hazardous materials used or generated during project activities. - Train workers on safe handling, storage, and disposal procedures in line with national regulations. - Use proper PPE and provide spill kits and emergency response equipment on site. - Store hazardous waste in secure, labeled containers and dispose of it only at authorized facilities. - Develop and implement a Hazardous Materials and Waste Management Plan as part of the CESMP. | Contractor PIU-ESSO | - Weekly inspections of hazardous material storage and disposal areas.  - Maintain waste tracking records and disposal receipts.  - Conduct random safety audits and verify training records.  - Report and investigate all spills or incidents involving hazardous materials. |
| Biodiversity Loss | Risk: Unregulated site preparation | Displacement of wildlife, loss of vegetation | - Conduct biodiversity assessments before construction.  - Implement conservation plans.  - Avoid construction in ecologically sensitive zones.  -Compensate for trees removed by planting new trees  -Significant efforts should be made to preserve large trees and those of high economic value. | Contractor, PIU-ESSO | - Pre-construction biodiversity surveys.- Regular monitoring of conservation efforts. |
| Transportation of Materials | Traffic congestion and safety risks | - Develop and implement a traffic management plan.  - Schedule material transport during off-peak hours. - Use flagmen to direct traffic near construction zones. - Install road safety signs near the project site.  -Communities must be given prior notice of intended road closures and designated detours. | -Weekly traffic management plan updates.  -Observations of compliance during site inspections. | -Contractor -Local Traffic Authority (Jamaica Constabulary Force Traffic Division) | -Biweekly review of the traffic management plan to ensure implementation of detour, signage and transport schedules.  -Spot checks to confirm the use of off-peak hours for material movement  -Site inspections to verify deployment of flag personnel and visibility of safety signs near the site.  -Documentation of public notifications (e.g. road closures or diversions)  -Log and address community complaints or incidents related to traffic or road safety. |
| Water Resource Depletion | Reduced availability of water for construction and community use; increased strain on local water resources | Use water-efficient technologies; implement rainwater harvesting systems; prioritize recycled water for non-potable uses; schedule water-intensive activities during off-peak hours; conduct awareness sessions on water conservation for workers. | Contractor, PIU- ESSO | -Monthly water usage tracking;  -Inspection of rainwater harvesting systems;  -Verification of compliance with water conservation practices during site visits;  -Documentation of recycled water use in construction activities. | -Site audits to ensure no over-extraction from the community or restricted water sources |
| Wastewater and Sewage Management Risks | Risk of Groundwater Contamination during Sanitation System Construction | Contaminated materials or improper excavation techniques may lead to groundwater pollution, affecting nearby water sources and public health. | - Use clean, uncontaminated equipment to excavate pits, especially when groundwater contact is likely.  - Implement protective barriers to prevent contamination runoff.  - Dispose of contaminated materials safely at approved waste sites.  - Train workers on best practices for handling hazardous materials. | Contractor | Regular water quality testing in and around the site; compliance with environmental safety guidelines. |
| Construction Health & Safety Risks | Risk of Trip and Fall from Height during Sanitation System Construction | Workers and site visitors may be exposed to trip and fall hazards due to open excavation pits, leading to serious injuries or fatalities. | - Mark the perimeter of all excavated pits with caution tape. - Notify workers and visitors of site hazards through signage and verbal communication. - Cover pits when not in use to prevent accidental falls. - Provide personal protective equipment (PPE) such as harnesses where applicable. - Ensure proper lighting around excavation areas to improve visibility. | Contractor | Continual assessment throughout implementation, daily safety inspections, and incident reporting. |
| Construction Health & Safety Risks | Risk of Cave-Ins during Pit Excavation | Unstable excavation walls may collapse, burying workers and causing severe injuries or fatalities. | - Excavate pits with walls angled instead of vertical to reduce the risk of collapse.  - Install a sturdy ladder in pits deeper than four feet to ensure safe entry and exit.  - Reinforce pit walls using shoring, trench boxes, or retaining structures in unstable soil conditions.  - Monitor soil stability throughout construction activities. | Contractor | Daily inspections of excavation sites; emergency preparedness plans for collapse incidents. |
| **Occupational Health & Safety Risks** | | | | | |
| Construction Site Safety | Risk: Worker injuries due to lack of PPE and training | Increased accidents | - Provide PPE to all workers.- Conduct regular safety training.- Establish clear accident reporting and emergency protocols.- Restrict site access to authorized personnel only. | Contractor, PIU-ESSO | - Daily safety inspections.- Record of training sessions conducted and attendance.- Incident and accident logs. |
| Risk of SEA/SH (Sexual Exploitation, Abuse, and Harassment) | Risk: Incidents involving workers and community members | Safety and reputation risks | - Implement GRM with confidential reporting.- Provide mandatory SEA/SH training for all workers.- Require all workers to sign a Code of Conduct **(Refer to Annex 2)**. | PIU- ESSO, Contractors | - Maintain records of SEA/SH-related grievances.- Conduct post-training assessments. |
| Construction Risk | Risk of Scaffolding Collapse or Unsafe Installation | Faulty scaffolding installation or use of inadequate materials could result in worker injuries, fatalities, and project delays. Additionally, reliance on unapproved materials, such as live trees, can cause environmental damage and structural instability. | No live trees shall be cut and used for building scaffolding. Steel or lumber supports for scaffolding must be obtained from an approved supplier. Scaffolding should be installed by trained professionals and tested frequently throughout the project life. Scaffolding should be checked immediately after hazardous events such as storms or earthquakes. Workers should be provided with fall protection gear, such as harnesses and guardrails. Conduct regular safety training for all workers handling scaffolding. | Contractor, Site Engineer | Weekly safety inspections of scaffolding. Immediate post-event inspections after storms or seismic activity. Incident log for scaffolding-related accidents. Training attendance records for workers handling scaffolding. |
| Cultural Heritage Risks | Risk of Cultural Heritage Disruption During Excavation and Site Preparation | Excavation activities may inadvertently disturb historical or cultural artifacts, leading to the loss of heritage, legal complications, and project delays. | - Develop a comprehensive cultural heritage management plan to guide excavation activities. - Train workers on 'chance find' procedures to ensure proper handling of discovered artifacts. - Collaborate with heritage authorities such as the Jamaica National Heritage Trust and local municipal corporations to document and preserve any cultural finds. - Implement a temporary halt procedure for excavation if significant cultural artifacts are uncovered, allowing heritage experts to assess findings. | Contractor, Jamaica National Heritage Trust, St. Ann Municipal Corporation, Jr. Project Engineer, PIU-ESSO | - Conduct regular site inspections during excavation to monitor cultural artifacts. - Maintain thorough documentation of any chance finds and resolution actions. - Ensure compliance with national and international cultural heritage preservation guidelines. |
| **Social Risk** | | | | | |
| Accessibility for Persons with Disabilities | Risk: Exclusion due to lack of accessible infrastructure | Limited access for students and staff with disabilities | - Ensure universal design principles, including ramps, tactile paving, accessible restrooms, and wider doorways. | Consultant, PIU-ESSO | - Design reviews to ensure compliance with accessibility standards. |
| Community Engagement | Risk: Lack of input from community members | Resistance, lack of local ownership | - Conduct participatory consultations, particularly with persons with disabilities, parents, and educators. | PIU- ESSO, CDC, CBOs | - Maintain consultation records.- Integrate feedback into design updates. |
| Governance Risks | Risk of Unresolved or Mishandled Grievances | Failure to address grievances effectively may lead to stakeholder dissatisfaction, community resistance, and potential project delays. | - Implement the project GRM with multiple submission channels (e.g., hotline, email, in-person). - Train PIU staff on grievance handling, including SEA/SH protocols. - Maintain a grievance log for tracking and resolution to ensure transparency. | PIU,-ESSO Contractor (with its own GRM) | - Quarterly grievance summary reports. - Stakeholder satisfaction surveys on the GRM’s accessibility and effectiveness. |
| Emergency Preparedness Risks | Risk of Construction-Related Accidents and Natural Disasters | Failure to implement emergency preparedness measures may result in severe injuries, property damage, and disruptions to project activities. | - Develop a site-specific Emergency Response Plan (ERP). - Conduct emergency drills with workers and community representatives. - Provide readily accessible first-aid kits and firefighting equipment at project sites. | Contractor, Local Emergency Services | - Review of ERP compliance during drills. - Incident response logs. - Annual updates to the ERP based on emerging risks. |
| Social Safeguards Risks | Risk of SEA/SH Incidents Involving Workers and Community Members | Unaddressed SEA/SH incidents may lead to harm to affected individuals, reputational damage, and non-compliance with safeguarding policies. | - Implement a GRM that includes confidential reporting and survivor-centered response mechanisms. - Conduct awareness campaigns and ensure access to support services for affected individuals. | PIU-ESSO, Contractors | - Maintain records of SEA/SH-related grievances and responses. - Conduct periodic reviews to assess response effectiveness. |
| Social Safeguards Risks | Lack of Awareness among Workers About SEA/SH and Workplace Behavior Expectations | Workers may unknowingly engage in inappropriate behavior, increasing the risk of SEA/SH incidents and workplace misconduct. | - Provide mandatory SEA/SH training to all workers, including contractors and the Supervising Engineer. - Conduct refresher training sessions to reinforce behavioral expectations. | PIU-ESSO Contractors | - Maintain training attendance logs. - Conduct post-training assessments to measure awareness improvements. |
| Equity and Inclusion Risks | Risk of Exclusion of Vulnerable Groups in Project Design | Failure to incorporate accessibility features and targeted outreach efforts may result in the exclusion of persons with disabilities, elderly individuals, and marginalized communities from benefiting fully from the project. | - Ensure accessibility features in all project designs, including ramps, tactile paving, accessible restrooms, and wider doorways. - Conduct targeted outreach programs to engage vulnerable groups and understand their specific needs. - Incorporate feedback from consultations into final project designs. - Provide materials in accessible formats such as Braille, sign language, and translated versions for non-native speakers. - Engage civil society organizations and community leaders to facilitate outreach and community participation. | PIU-ESSO,  Contractor | Risk of Exclusion of Vulnerable Groups in Project Design |
| Equity and Inclusion Risks | Risk of Gender-Based Exclusion in Employment and Decision-Making | Failure to implement gender-sensitive policies may result in women's limited participation in employment opportunities and decision-making processes, leading to gender disparities in project benefits. | - Develop gender-sensitive employment and training programs to promote women's inclusion. - Ensure active participation of women in consultations, planning, and decision-making processes. - Implement gender-responsive workplace policies, including safe work environments and family-friendly policies. - Conduct awareness campaigns on gender equity and empowerment within the project. | PIU-ESSO | - Periodic review of gender-focused program outcomes. - Development of Gender Monitoring, Evaluation, and Learning (GMEL) framework. - Maintain records of women's participation in consultations and training programs. - Track gender-disaggregated employment data to assess progress on gender inclusivity. |
| Labor and Employment Risks | Risk of Labor Rights Violations, Including Unfair Wages and Poor Working Conditions | Failure to uphold fair labor standards may result in worker exploitation, disputes, low productivity, and reputational damage for the project. | - Enforce compliance with the Labor Management Procedures (LMP) to protect workers' rights. - Ensure fair wages and benefits for all workers, adhering to national labor laws and international best practices. - Establish clear worker protections, including access to grievance mechanisms for reporting labor-related issues. - Conduct training sessions for contractors and project staff on labor rights and ethical employment practices. | PIU- ESSO,  Contractor | - Conduct periodic labor audits to verify contract compliance and adherence to fair labor standards. - Monitor grievance records and resolution efficiency to ensure worker concerns are addressed. - Ensure compliance with Labor Management Procedures (LMP) through routine inspections and reporting. |
| Hiring of Local Workers | Risk: Exclusion of local labor | Community dissatisfaction | - Prioritize local hiring for low-skilled and semi-skilled construction activities. | Contractors, PIU-ESSO | - Track percentage of local hires.- Report employment data. |
| **Emergency Preparedness** | | | | | |
| Construction Accidents & Natural Disasters | Risk: Inadequate response to emergencies | Delayed response, increased casualties | Report all accidents to the MoEY/PIU and World Bank within 48 hours **(Refer to Annex 1)**.  - Develop a site-specific Emergency Response Plan (ERP).- Conduct emergency drills with workers and community representatives.- Provide accessible first-aid kits and firefighting equipment at project sites. | Contractor, Local Emergency Services | - Review ERP compliance during drills.- Incident response logs.- Annual updates to the ERP based on emerging risks. |

## 6.0 Emergency Preparedness and Response

Despite the implementation of proper environmental, health, and safety systems, emergency situations may still arise during the construction. The primary objective in such events is to ensure a prompt, effective, and coordinated response by the Contractor to minimize risks to workers, the public, and the environment.

To guide emergency preparedness and response, this section describes the Emergency Response Plan (ERP). The ERP outlines:

* Emergency Contact Details
* Emergency Procedures
* Description of Potential Emergencies
* Authority of Control and Responsibilities
* Scenario-Based Response Protocols
* Inventory of Hazardous Materials
* Incident Reporting and Documentation Procedures

**Contractor Responsibilities**

The **Contractor must develop a site-specific ERP as part of its C-ESMP**, using this plan as a **guideline**, and ensure:

* All workers receive a copy of the ERP and it is posted onsite in an accessible location.
* Regular emergency drills and training sessions are conducted to familiarize workers with workplace hazards, response measures, and evacuation procedures.
* Workers are trained in fire safety, hazardous material handling, first aid, and accident prevention measures.
* Good housekeeping practices are maintained to reduce risks of fires, spills, and other emergencies.

**Training and Emergency Preparedness**

* All personnel must be trained on the potential hazards of their work areas and the precautionary measures to prevent emergencies.
* Emergency response drills should be conducted periodically to test response efficiency.
* The Contractor must document and evaluate all emergency drills and real incidents to improve response strategies.

## 6.1 Objectives of Emergency Response

The emergency response objectives include:

1. Protect human health and safety;

2. Protect and minimize the effect on the environment or property;

3. Contain the spread of material;

4. Neutralize and render safe any noxious or hazardous materials; and

5. Commence clean-up activities and site remediation.

By their very nature, emergency response procedures address events either not foreseen or almost totally unlikely. It is necessary therefore to plan for worst case scenarios or adopt general procedures, as normally anything that can be covered by a specific plan is not an emergency. It is important to recognize that, although highly unlikely, an emergency can have serious impacts well beyond the individual operation.

## 6.2 Emergency Contact Details

The contact information for institutions and agencies to be engaged in case of emergency is outlined in Table 6. These institutions are either relevant to the project activities or its location.

**Emergency Contact Information**

Table 3: Emergency Contact Information

|  |  |  |
| --- | --- | --- |
| **Emergency Contact Numbers** | | |
| **No** | **Organization** | **Contact Number** |
| **1** | St. Ann’s Bay Regional Hospital | 876- 972-2272 |
| **2** | Brown's Town Police Station | 876-975-2233 |
| **3** | **Brown's Town Fire Station** | (876) 975-2316 |
| **4** | Parish Disaster Coordinator (St. Ann Municipal Corporation) | (876) 972-2615 or (876) 972-2616 |
| **5** | **Lifeline Medical Services (Ocho Rios)** | (876) 404-7913 |

## 6.3 Authority of Control

The staff structure should comprise the Contractor, Site Engineer, who reports directly to the contractor. This person should be responsible for the day-to-day execution of works at the project site. A specialist who will advise on specialized areas should provide environmental and health and safety support. The Site Engineer should have the authority to take control of any incident and can make a decision to close down all or any part of the operations following an incident. This person should also decide on the type and level of response required for a particular emergency.

## 6.4 Emergency Response Equipment

The Contractor should maintain stocked and adequate First Aid Kits onsite. These kits should be located in a central area and clearly labelled. The kits' contents should be consistent with what is recommended by the Red Cross and should be accompanied by proper instructions on usage. Advanced medical services are also available at the S. Ann’s Bay Regional Hospital, approximately 30 minutes away.

Firefighting equipment, such as fire extinguishers and sand buckets, and instructions on their usage, should be located at strategic points at the construction site. These points should be clearly marked and visible at all times, and employees should be aware of their positions. Dry chemical extinguishers should be acquired. Staff should be trained in fire response and operating fire response equipment available on site.

Fuel storage onsite should be avoided, but if kept onsite, it should be stored in limited quantities in sealed metal drums and kept in an enclosed area with an impermeable base. In the case of a spill outside of this area, a Spill Kit should be kept onsite to assist with the clean-up.

## 6.5 Response Mechanism

Emergency response measures should be applied to minor and major incidents/accidents. **All incidents/accidents must be reported by the contractor to the MoEY, PIU and the World Bank within 48 hours.** Adequate information and equipment should be maintained on site to respond to emergencies. The following outlines the emergency response procedures for several types of emergencies that may occur during the project implementation.

### 6.5.1 Minor Incident/Accident

In the event of a minor accident, the Site Engineer or Foreman should be informed and take responsibility for on-site treatment utilizing First Aid facilities. If none of the employees hired had prior training in first aid, the contractor should consider training personnel. An entry should be made into the Accident and Emergency Record book, which is to be kept on the project site at all times.

### 6.5.2 Major Incident/Accident

In the event of a major accident, the following measures should be implemented:

* + - * + Inform the Site Engineer or Foreman.
        + Assess type of injury, i.e. broken leg, conscious or unconscious.
        + In the case of injury, First Aid treatment is to be applied.
        + Arrange transportation to the St. Anns Bay Regional Hospital if the case is serious.
        + Make entry into the Accident and Emergency Record book.

### 6.5.3 Fire

Fire-fighting equipment such as fire extinguishers and sand buckets should be located at strategic points within the project area, such as the fuel storage area, with instructions on their usage. These points should be clearly marked, be visible and employees should know their position. Fire safety signs should be posted in areas which present a fire risk, such as the fuel storage area. A clearly identified muster point should be designated along with evacuation routes. In the event of a fire, employees should initiate the following procedure, which they would be familiar with as a result of fire drills:

* + - * + Immediately warn others and evacuate area.
        + Attack the fire if safe to do so, with fire-fighting equipment provided, but without taking personal risks.
        + Take decisions on containment. If it is a small fire, use a fire extinguisher. In the event of a larger fire, employ water spray if a water pump is available on site. Also, contact the Jamaica Fire Brigade.
        + Contact the site Environmental and Safety Personnel.
        + Make entry into the Accident and Emergency Record book.

### 6.5.4 Fuel Spills

If fuel is stored on-site for equipment refueling, it should be located within a containment area with an impermeable base. However, in the event of a spill beyond or outside the containment area the following action should be taken:

* + - * + Attempt to stop the flow if possible.
        + Inform the contractor Environmental Personnel and seek guidance.
        + Prevent the movement of people or vehicles into restricted areas.
        + Treat the spill with absorbent materials such as sand or sawdust and a bund formed if possible to prevent the spill from spreading and contaminating the waterways and soil.
        + Collect absorbent materials and place in a secured area with an impervious base at a restricted zone.
        + Make entry into the Accident and Emergency Record book.

### 6.5.5 Incident Reporting

A report should be required after every incident/accident **(Refer to Annex 1)**. The Contractor's Environmental Personnel should be responsible for preparing such a report and submitting to the PIU within an agreed timeframe. However, a verbal report should be made to the MoEY, PIU and the World Bank within 48 hours after learning of the incident or accident.

# 7.0 Preliminary ESMP Implementation Framework

The implementation framework was prepared to guide the implementation of the PESMP/ESMP and ensure compliance with the World Bank’s ESF requirements.

## 7.1 Environmental Management Organisational Framework

The environmental and social management framework has roles and responsibilities at the level of the PIU, Supervisory Consultants and the Contractor.

PIU

The MoEY is the implementing agency for the JEP project and has established a PIU to oversee the implementation of the project. The PIU has the responsibility of ensuring environmental, social, health and safety compliance, including compliance with the World Bank’s ESS.

The PIU is staffed with an Environmental & Social Safeguards Officer (ESSO) to assist with the implementation of the ESHS requirements. This person will oversee the environmental, social and health and safety aspects of the project. The ESSO will ensure that the project’s ESMP is adhered to where applicable, and that the contractor prepare and implement the C-ESMP. The ESSO will also be required to ensure the ESHS requirements are included in the bidding documents and contracts, communicate all ESHS requirements to the supervisory consultants and contractor, review the ESHS reports from the supervisory consultants, conduct periodic visits to the project site to verify the level of ESHS compliance, provide recommendation for ESHS compliance, participate in the project progress meetings, and implement and maintain records of the GRM.

Supervisory Consultants

A Supervisory Consultants firm will be engaged to oversee the construction works to be done at the JEP project site. The Supervisory Consultants has as a member of their team an ESHS Personnel who will have the responsibility of ensuring compliance with the environmental, social, health and safety requirements relating to the project. This person should be responsible to provide direction as may be required to the contractor (and to the PIU as may be required) to ensure the project meets its ESHS objectives and complies with the project ESMP. The Supervisory Consultants will be required to monitor the contractor’s ESHS performance against the national requirements and that of the MoE, as well as the C-ESMP. They will also be required to ensure that the Contractor’s ESHS performance is in accordance with the requirements of the Occupational Safety and Health Act and meets the requirements of all state agencies tasked with the monitoring, regulation and promotion of safety at work.

The ESHS related services to be provided by the Supervisory Consultants should include but not limited to:

* Review and approval of the contractor’s CESMP;
* Review and approve the contractor’ method statements, implementation plans, prevention and response action plan, drawings, proposals, schedules and all relevant documents;
* Review and consider the ESHS risks and impacts of any design and/or methodology change proposals and advise if there are implications for compliance with the project environmental requirements, consent/permits and other related project matters;
* Undertake audits and inspections of contractors’ accident logs, community liaison records, monitoring findings and other ESHS related documentation, as necessary, to confirm the contractors’ compliance with the ESHS requirements;
* Agree on remedial action/s and their timeframe for implementation in the event of a non- compliance with the contractors ESHS obligations;
* Ensure appropriate representation at relevant meetings including site meetings, and progress meetings to discuss and agree on appropriate actions to ensure compliance with ESHS obligations;
* Check that the Contractor actual reporting (content and timeliness) is in accordance with the contractor’s contractual obligations;
* Review, critique and consult in a timely manner with the Contractor the ESHS documentation (including regular reports and incident reports) regarding the accuracy and efficacy of the documentation;
* Undertake liaison, from time to time and as necessary, with project stakeholders to identify and discuss any actual or potential ESHS issues;
* Establish, communicate, maintain and implement a grievance redress mechanism including types of grievances to be recorded and how to protect confidentiality;
* Provide appropriate training to contractor's workers when necessary or required by the PIU; and
* Monitor the construction site to verify the Contractor’s compliance with the CESMP and promptly communicate to the PIU any serious deviations.

Contractor

The Contractor will be required to employ a suitable qualified and experienced personnel as an Environmental, Social, Health and Safety Officer, with the responsibility of ensuring compliance with the environmental, social, health and safety requirements. The responsibilities of this individual should include but not limited to the following:

* Prepare the Contractor Environmental and Social Management Plan consistent with the project’s ESMP;
* Conduct training of workers in health, safety and environmental requirements, including health and safety induction prior to commencement of work onsite and regular tool box sessions;
* Liaise with the PIU Environmental Specialist and Social Specialist and Supervisory Consultants’ ESHS Personnel on compliance;
* Implement the C-ESMP;
* Conduct site inspections, audits and permanent supervision at the construction site to ensure adequate and timely implementation of, and compliance with, the CESMP;
* Address any grievances of stakeholders and liaise with the supervisory consultant and PIU to respond; keep the PIU informed of all grievances;
* Report on environmental, social, health and safety compliance;
* Implement an Incident Reporting and Investigation Procedure, including investigation of the Root Cause (RCA-Root Cause Analysis), and immediate reporting to the PIU of Major incidents/accidents; and
* Oversee the clean-up and decommissioning of the site on the completion of works.

## 7.2 Contractor Requirements

The Contractor should prepare a C-ESMP to address environmental, social, health and safety issues pertinent to the construction phase of the project. The CESMP will be submitted and approved by the supervisiory consultants prior to the commencement of works. Once approved, the CESMP is expected to be fully implemented during the construction period. Preparation of the CESMP should be guided by this ESMP, relevant national standards and guidelines including those of the MoE and World Bank. The following should be addressed/included in the CESMP:

* **HSSE Policy** – The Contractor’ Health Safety, Social and Environmental Policy should be included in the Plan. The policy should also address alcohol and drug use, and interactions with local communities and stakeholders.
* **Management Structure** – The CESMP should describe the Contractor’ staffing structure for the project, clearly highlighting the responsibilities for health, safety, and the environment.
* **Work Programme** – An overview of the Contractor’ proposed Work Programme, including information on the duration of works, number of workers to be onsite, potential areas for material stockpiles, living arrangements for workers and if applicable, the type and quantity of heavy vehicles that will visit the site. This information will be essential in the review process of the CESMP.
* **Solid Waste Management** – Measures to manage solid waste generated during construction should be described. It should be noted that the contractor is expected to implement a system to ensure solid waste is management properly. Solid waste expected to be generated includes garbage such as plastic bottles and food boxes, and construction waste such as packaging materials, wood, formwork, etc. Adequate collection receptacles are to be provided onsite and waste should be taken to an approved disposal site. Waste should not be allowed to accumulate in significant quantity onsite for extended period (not more than 30 days) and should be consolidated in a designated area. Reusable construction waste should be separated for reuse. No burning of any type of the wastes generated will be allowed onsite. Workers are to be made aware of the waste management procedures.
* **Liquid Waste/Wastewater Management** - The Contractor is expected to provide adequate toilet facilities onsite based on the number of workers. The Contractor is also expected to provide toilets facilities for the Supervisory Consultants. The number and type of toilets to be provided, whether portable or toilets equipped with septic tanks should be indicated. Provision of water for the toilets and maintenance of the toilets should also be described, since toilets are expected to be well maintained. If portable toilets are to be utilized these will have to be maintained and emptied on a regular basis.
* **Hazardous Waste Management** - The construction works are not expected to generate significant hazardous waste. If hazardous waste is generated onsite, the waste should be carefully collected and removed from site and disposed of in an approved manner. A register of hazardous waste generated should be kept onsite by the Contractors.
* **Hazardous Materials Management** – The Plan should state if hazardous materials will be kept onsite or taken to the site as required. Based on the works to be conducted no significant amount of hazardous waste is expected to be stored onsite. If hazardous materials are to be kept onsite then the CESMP should describe how this will be done.
* **Sedimentation Control** – The CESMP should describe measures to be implemented by the contractors to prevent sedimentation of nearby drains. Stockpiles of construction materials should be placed away from the drainage systems. Nearby drains should also be regularly checked for accumulation of construction materials and if found to be present the materials should be immediately removed.
* **Dust Control** - There is the potential for dust nuisance to occur which can affect workers and nearby receptors, including students and teachers. Dust can be generated from material transport and stockpiles, as well as construction works such as concrete mixing, cutting of tiles and concrete, etc. As such, the Contractor must include in the CESMP measures to prevent dust nuisance from occurring. Measures such minimizing the height of sand stockpiles, covering of stockpiles, covering of trucks transporting materials to the sites, providing dust screens, providing dust mask to workers should be considered.
* **Noise Prevention** – Construction activities can generate noise at levels which can affect workers and nearby receptors including students and teachers, and in this regard, measures should be outlined to keep noise levels within the prescribed limit. Noise levels should not exceed 90 dB during the day and 75 dB at nights. The noise levels recommended in the World Bank’s General EHS Guidelines for educational receptors are 55 dB during daytime (07:00 hrs. – 22:00 hrs.) and 45 dB at night (22:00 hrs. – 07:00 hrs.). The EHS Guidelines also stipulate that the noise generated should not result in a maximum increase in background levels of 3 dB at the nearest receptor location off-site. Night works should be avoided and should be approved in advance by the Supervisory Consultants. The Contractor shall ensure that equipment is in good working order with manufacturer supplied noise suppression (mufflers etc.) systems functioning. Where noise is likely to pose an impact to the teachers and students and nearby residents they should be informed. Workers operating in areas where decibel levels reach more than 85 decibels should use hearing protection.
* **Workers Health and Safety** – Construction activities pose several risks to workers health and safety. It is therefore essential that the contractors develop and implement a system to ensure workers health and safety are not compromised. This should be detailed in the CESMP. It should describe management commitment to safety and employees’ involvement. An analysis of the worksite in terms of safety, and the potential hazards/risks should be included. Prevention and control measures should be included. Measures which should be considered by the contractors should include the provision and enforcing the use of safety gears by workers, training of workers, identify hazardous areas, use of scaffoldings, etc. Standard Operating Procedures (SOPs) for construction activities such as working on heights, erecting and using scaffolds, using ladders and others identified through the Job Hazard Analysis (JHA) should be prepared. Workers should be trained on SOPs prepared. All safety activities must be documented and all illness/injury and exposure should be documented on an Incident Form. Near misses should also be documented. All incidents /accidents should be investigated and Root Cause Analysis (RCA) done.
* **Community Safety** – Measures should be implemented to ensure that the safety of the community are not compromised. Measures should also be included to ensure minimal disruption of community activities.
* **Occupational Health and Safety Management Plan** - The Contractor should prepare an Occupational Health and Safety Management Plan which should include measures and requirements of Section 2 of the World Bank General Environmental, Health and Safety Guidelines (ESHSGs) on Occupational Health and Safety and on construction and decommissioning. The Plan should also ensure that the requirements of the Occupational Safety and Health Act are complied with.
* **Emergency Preparedness and Response Plan** – An Emergency Preparedness and Response Plan must be included in the CESMP to address emergencies relevant to the project. The possible emergencies are:
  1. Accidents – can occur which can result in injuries to workers. At least one well stocked First Aid Kit should be provided onsite and arrangements should be in place to transfer serious cases to medical institutions.
  2. Fires - Fire extinguishers and/or other response measures must be placed at the working sites and training should be provided on usage.
  3. Fuel/Chemical Spills - If there is a large spill or release of solvents, fuels, or other kind of hazardous material, then the EPA should be notified and other measures taken. A spill response kit should be provided and kept onsite and workers should be trained to respond to spills through mock spills exercises.

The Emergency Preparedness and Response Plan should also address training of employees, assembly point in case of emergency, emergency contacts, communications, responsible personnel, response procedures and incident reporting.

* **Chance Find Procedure** – While the possibility of a discovery of an artifact during construction is extremely low, a Chance Find Procedure should still be in effect and should be implemented if there is a discovery. This should be included to cater for if during excavations archaeological pieces are found. The procedures to be followed should be outlined. The works must be stopped and the National Heritage Trust should be informed.
* **Training** - Prior to the commencement of works the contractor should conduct an Induction Training for all workers. The training should be conducted by the contractor’s ESHS Personnel and covers the environmental and social requirements of the project, including the role of workers in pollution control, health and safety and emergency response. Thereafter, all new workers should be adequately briefed on the requirements prior to commencing work onsite. If necessary, refresher training may be conducted, and supplemented by regular Tool Box sessions. Training should also be provided in any SOPs prepared. Training to be conducted should be described in the CESMP
* **Site Closure, Decommissioning and Restoration** - At the conclusion of works the sites should to be cleaned up and all waste removed and all temporary structures belonging to the contractor dismantled and also removed. The measures to be employed by the contractor during this process should be described in the CESMP.
* **Grievances** – A Grievance Mechanism is included in the ESMP (Section 4.6). However, since the Contractor will be responsible for addressing grievances, including implementation of corrective actions, measures to be employed by the contractor in dealing with grievances should be outlined in the CESMP. A separate mechanism to address grievances of construction workers should also be included in the CESMP, which should be consistent with the requirements outlined in the Project’s Labour Management Procedures.
* **Information Disclosure** – The project will ensure timely and accessible disclosure of relevant information to stakeholders and local communities throughout the project lifecycle. Information on project activities, potential risks, mitigation measures, and emergency preparedness will be disseminated through various channels, including community meetings, printed materials, radio broadcasts, and digital platforms (e.g., WhatsApp groups, social media, and Moey websites). The Contractor will be required to outline specific measures for information dissemination in the Construction Environmental and Social Management Plan (CESMP) to ensure that affected communities remain well-informed and engaged.
* **Stakeholder Engagement** – The project includes a structured **Stakeholder Engagement Plan (SEP)** (refer to the disclosed SEP) to facilitate ongoing consultation with key stakeholders, including local communities, government agencies, and vulnerable groups. The Contractor will be responsible for implementing engagement activities, such as public consultations, grievance handling, and feedback integration. Measures to be employed by the Contractor for stakeholder engagement, including the frequency of meetings, consultation methods, and inclusion of marginalized groups, should be detailed in the **CESMP** to ensure meaningful participation and transparency in project implementation.
* **Monitoring and Reporting** – The CESMP should outlined how monitoring will be done by the contractor’s ESHS Personnel, including frequency, areas to be monitored, etc.

## 7.3 Environmental and Social Monitoring

Project activities should be monitored to ensure that the recommended mitigation measures and management practices identified in this Preliminary ESMP are implemented and effective. The MoEY, through the ESSO, would conduct periodic monitoring during the construction phase of the project. This will require frequent visits to the site to conduct monitoring to determine compliance with the environmental, social, health and safety requirements. Monitoring is also expected to be conducted by the Supervisory Consultants to determine the contractor’s compliance with the ESHS requirements of the project included in the C-ESMP. The Contractor should also conduct monitoring onsite to ensure their level of compliance. Table 8 identifies the recommended criteria to be monitored as well as the frequency and location of monitoring activities.All mitigation measures outlined in the table will be subject to ongoing monitoring to ensure compliance with project safeguards and regulatory requirements. The PIU will track the effectiveness of these measures through periodic site inspections, compliance reports, and stakeholder feedback mechanisms.

Table 4: ESHS Monitoring During Project Construction

|  |  |  |
| --- | --- | --- |
| **Environmental and Social Criteria** | **Frequency** | **Locations** |
| **Air Quality** | | |
| Evidence of dust accumulation and suspended particles through visible observation | Continuous | Around active construction zones |
| Periodical checks with receptors |
| **Noise** | | |
| Decibel levels | Weekly | Around active construction zones |
| **Water Quality** | | |
| Visual observation for sedimentation and oil and grease | As needed, or after periods of heavy rainfall | Water sources near the project site |
| **Waste Management** | | |
| Compliance with CESMP and waste management practices | Daily | Waste receptacles, disposal sites, and active construction sites |
| Littering and waste accumulation |
| **Health and Safety** | | |
| Use of protective gear by workers | Continuous | Active construction work areas |
| Adequate and appropriate signage |
| Location of Emergency Procedures |
| Availability of emergency response equipment | Continuous | Active construction work areas |
| Demarcation of construction site |
| Barricading and securing of construction site |
| **Worker’s Health and Safety** | | |
| Health conditions of staff | Weekly | Construction work sites |
| Stocked First Aid Kit | Designated areas on-site |
| **Worker’s Code of Conduct (CoC) Compliance** | | |
| Worker adherence to CoC, including respect for colleagues and community members | Monthly audits | Work sites and worker housing (if applicable) |
| Reports of violations and disciplinary actions taken | Monthly reviews | Human Resources records |
| Mandatory CoC training for workers and refresher training sessions | Bi-annual | Training facilities or virtual sessions |
| **Hiring Practices** | | |
| Compliance with non-discriminatory hiring practices, ensuring gender equity and inclusion | Quarterly | HR department and employment records |
| Hiring of workers in alignment with Jamaican labor laws and World Bank ESS2 | Quarterly audits | HR department |
| Equal opportunity for vulnerable groups (women, persons with disabilities, marginalized youth) | Quarterly | Employment tracking and recruitment reports |
| **SEA/SH Prevention and Response** | | |
| Reports of SEA/SH incidents through the Grievance Redress Mechanism (GRM) | Continuous | Confidential reporting channels |
| Mandatory SEA/SH training for workers and contractors | Bi-annual | Work sites and training sessions |
| Compliance monitoring of contractors and subcontractors with SEA/SH prevention measures | Quarterly audits | Work sites and HR records |
| Accessibility of survivor support services (medical, legal, and psychosocial) | Continuous | Community health and safety service providers |
| **Stakeholders Wellbeing/Concerns** | | |
| * Grievances which may arise * Disruption to community activities * Compliance with the Workers Code of Conduct   Any emerging issue | Continuous | Within the site area and surrounding community and involving key stakeholders |

## 7.4 Reporting

In order to ensure that the level of ESHS compliance is documented a reporting mechanism should be implemented. Monthly progress meetings are expected to be held at which ESHS matters will be reported on and discussed. Members from the supervision firm, PIU, contractor must be at all meetings. If necessary a member from the Browns Town CDC should also be present in addition to key stakeholders from the St. Ann Municipal Council. In addition, reporting should be done by the PIU, Supervisory Consultants and the Contractor.

PIU

The ESSO would prepare a monthly Environmental and Social compliance report documenting the compliance status, areas of non-compliance, recommended corrective actions, and other required improvements. This report will be submitted to the World Bank.

In addition, the PIU will notify the Bank within 48 hours of learning of any incident or accident related to the Project which has, or is likely to have, a significant adverse impact on the environment, the affected communities, the public or workers, including, inter alia, SEA/SH and accidents that result in death, serious or multiple injury, including during construction activities. Sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or planned to address it, and any information provided by any contractor and/or supervising firm, as appropriate, will be provided. Please refer to annex 1 for guidance on reporting incidents.

Supervising Consultants

The supervising consultants will prepare a monthly report to the PIU detailing the contractor's ESHS performance and compliance. The PIU will review and accept it when satisfied with the content.

Contractor

The Contractor will be required to report on environmental compliance at the Monthly Progress Meetings and in the Monthly Progress Reports to the Supervising Consultant. The Contractor will also be required to report on any environmental or health and safety incidents which might occur. The Contractor is expected to submit a report to the Supervising Consultants ESHS performance at least on a monthly basis. The report should include but not be limited to the following:

* Environmental incidents or non-compliances observed and corrective actions taken with regards to contract requirements, including waste management, contamination, noise and dust control, traffic management, etc.;

Health and safety incidents, accidents, injuries and all fatalities that require treatment and actions taken to improve conditions. Information on the number of workers, work hours, PPE provided and usage, and worker violations and follow-up actions taken (if any);

* C-ESMP implementation progress, including implementation of the management and mitigation measures outlined in the plan, the effectiveness of the measures being implemented, any emerging ESHS issue and any adjustments required (if any); and
* Grievances by workers and community, including grievances received, how were resolved, those unresolved and plan for resolving these.
* In addition to the monthly report, the Contractor should also provide immediate notification to the Supervisory Consultants of incidents in the following categories:
  + - confirmed or likely violation of any environmental, labour and safety legislation;
    - any fatality or serious (lost time) injury;
    - significant adverse effects or damage to private property, e.g. vehicle accident;
    - damage to public utilities; or
    - any allegation of sexual harassment or sexual misbehaviour, child abuse, defilement, or other violations involving children.

Full details of such incidents shall be provided to the Project Manager within the timeframe agreed.

The contractor is responsible for reviewing and updating the C-ESMP every 6 months which will need to be reviewed and accepted by the Supervisor Consultant.

# 8.0 Conclusion

The implementation of the project will need to comply with the relevant GOJ laws and regulations and the World Bank environmental and social framework, and the PESMP prepared for the project. The PESMP has identified the potential impacts of the intervention and outlines the mitigation measures to be applied during the construction phase of the project to avoid, reduce or mitigate adverse environmental and social impacts. The project is not complex and most of the environmental and social impacts will occur during the construction phase and are considered temporary, short term, localised, and are classified as low to moderate risk. Most of the direct impacts can occur within the project site’s sphere of influence. The PESMP will be required to be updated to an ESMP once the designs for the STEM school have been completed. In addition, the ESMP will need to be reviewed and cleared by the World Bank and included in the MoEY bidding documents which will be adopted by the contractor to prepare a Contractor Environmental and Social Management Plan (C-ESMP), incorporating the recommendations of the project’s ESMP.

# Annex 1: Incidents and Accidents Reporting Forms

The **client** shall promptly notify the World Bank, within 72 hours after learning of the incident or accident, of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, in accordance with the ESCP, the instruments referenced therein and the Environmental and Social Standards. The Incident Forms Part B (see Annex) template will be used for reporting according to the incident category.

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

1. **Fatality**: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).
2. **Lost Time Injury**: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.
3. **Acts of Violence/Protest**: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.
4. **Disease Outbreaks**: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.
5. **Displacement Without Due Process:** The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.
6. **Child Labor:** An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (iii) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.
7. **Forced Labor**: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.
8. **Unexpected Impacts on heritage resources**: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.
9. **Unexpected impacts on biodiversity resources**: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.
10. **Environmental pollution incident**: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs or have resulted in harm to the environment.
11. **SEA/SH**: Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
12. **SOGI**: Violence on the basis of SOGI or Discrimination on the basis of SOGI.
13. **Other**: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

A subsequent report after investigation will be submitted to the Bank in a timeframe acceptable to the Bank. The report will include a description of such Significant Event, and the measures, if any, that the Recipient is taking or plans to take to address such Significant Event and to prevent any future similar event. In case the accident resulted in fatality/injury for worker or member of the public, then the accident Form Part C (Annex) template will be used for reporting. In case of SEA/SH and SOGI incidents then the corresponding Part C forms shall be used (also in Annex).

The description of the Event shall address the following questions (if possible and relevant).

● What was the incident? What happened? To what or to whom? ● Where and when did the incident occur? ● What is the information source? How did you find out about the incident? ● Are the basic facts of the incident clear and uncontested, or are there conflicting versions? ● What were the conditions or circumstances under which the incident occurred? ● Is the incident still ongoing or is it contained? ● Is the loss of life or severe harm involved? ● How serious was the incident? How is it being addressed?

The report will contain a Root Cause Analysis (RCA), highlighting the reasons that lead into this incident. The Event description and RCA analysis will be shared with the World Bank preferably within 10 days after the occurrence of the Event. The RCA will be discussed with the Bank and agreements will be made on the corrective actions.

The **client** will prepare a Corrective Action Plan which will describe the set of measures (short, medium, long term), responsibilities and timelines for implementation, as appropriate to address the root causes to help prevent any recurrence of the incident and discuss this plan with the Bank. The Corrective Action Plan should be based around a summary table, with additional supporting text and information to adequately describe the measures and how they will achieve the corrective actions to address the immediate, underlying, and root causes identified in the investigation report. The Corrective Action Plan template found under Annex should be used.

The **Client** will keep the World Bank informed of the on-going implementation of the said measures and plans.

**Part B: To be completed within 24 hours**

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| --- | --- | --- | --- | --- | --- |
| **B1: Incident Details** | | | | | |
| **Date of Incident:** | **Time:** | | **Date Reported to PIU:** | | **Date Reported to WB:** |
| **Reported to PIU by**: | | **Reported to WB by**: | | **Notification Type**: Email/’phone call/media notice/other | |
| **Full Name of Main Contractor**: | | | **Full Name of Subcontractor**: | | |

|  |
| --- |
| **B2**: **Type of incident (please check all that apply)**1 |
| Fatality  Lost Time Injury  Displacement Without Due Process  Child Labor Acts of Violence/Protest Disease Outbreaks  Forced Labor  Unexpected Impacts on heritage resources  Unexpected impacts on biodiversity resources  Environmental pollution incident  Dam failure  Other |

1See Annex 1 for definitions

|  |
| --- |
| **B3: Description/Narrative of Incident** |
| *Please replace text in italics with brief description, noting for example:*   1. *What is the incident?* 2. *What were the conditions or circumstances under which the incident occurred (if known)?* 3. *Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?* 4. *Is the incident still ongoing or is it contained?* 5. *Have any relevant authorities been informed?* |

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| --- | --- | --- | --- |
| **B4: Actions taken to contain the incident** | | | |
| **Short Description of Action** | **Responsible Party** | **Expected Date** | **Status** |
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| **For incidents involving a contractor:** Have the works been suspended (for example, under GCC8.9 of Works Contract)? Yes ☐; No ☐; Trading name of Contractor (if different from B1):  Please attach a copy of the instruction suspending the works. | | | |

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| **B5: What support has been provided to affected people** |
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**Annex 1: Incident Types**

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

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

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

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

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

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

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

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

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

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

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

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

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

**Part C: To be completed following investigation**

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| **C1: Investigation Findings** |
| *Please replace text in italics with findings, noting for example:*   1. *where and when the incident took place,* 2. *who was involved, and how many people/households were affected,* 3. *what happened and what conditions and actions influenced the incident,* 4. *what were the expected working procedures and were they followed,* 5. *did the organization or arrangement of the work influence the incident,* 6. *were there adequate training/competent persons for the job, and was necessary and suitable equipment available,* 7. *what were the underlying causes; where there any absent risk control measures or any system failures,* |

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| **C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)** | | |
| **Action** | **Responsible Party** | **Expected Date** |
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**Part C cont.: To be completed following investigation**

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| --- | --- | --- | --- | --- | --- | --- |
| **C3a: Fatality/Lost time Injury information**  **Immediate cause of fatality/injury for worker or member of the public (please check all that apply)** 2**:**  **1. Caught in or between objects**  **2. Struck by falling objects**  **3. Stepping on, striking against, or struck by objects**  **4. Drowning**  **5. Chemical, biochemical, material exposure**  **6. Falls, trips, slips**  **7. Fire & explosion**  **8. Electrocution**  **9. Homicide**  **10. Medical Issue**  **11. Suicide**  **12. Others**  ***Vehicle Traffic:* 13. Project Vehicle Work Travel**  **14. Non-project Vehicle Work Travel**  **15. Project Vehicle Commuting**  **16. Non-project Vehicle Commuting  17.Vehicle Traffic Accident (Members of Public Only) ☐** | | | | | | |
| **Name** | **Age/DOB** | **Date of Death/Injury** | **Gender** | **Nationality** | **Cause of Fatality/Injury** | **Worker (Employer)/Public** |
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2See Annex 2 for definitions

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| **C3b**: **Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)**  **1. Contractor Direct**  **2. Contractor Insurance**  **3. Workman’s Compensation/National Insurance**  **4. Court Determined Judicial Process**  **5. Other**  **6. No Compensation Required** | | | |
| **Name** | **Compensation Type** | **Amount (US$)** | **Responsible Party** |
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| **C4: Supplementary Narrative** |
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**Annex 2: Definition of fatality/injury immediate causes**

1. **Caught in or between objects:** caught in an object; caught between a stationary object and moving object; caught between moving objects (except flying or falling objects).

2. **Struck by falling objects:** slides and cave-ins (earth, rocks, stones, snow, etc.); collapse (buildings, walls, scaffolds, ladders, etc.); struck by falling objects during handling; struck by falling objects.

3. **Stepping on, striking against, or struck by objects:** stepping on objects; striking against stationary objects (except impacts due to a previous fall); Striking against moving objects; Struck by moving objects (including flying fragments and particles) excluding falling objects.

4. **Drowning:** respiratory impartment from submersion/emersion in liquid.

5. **Chemical, biochemical, material exposure:** exposure to or contact with harmful substances or radiations.

6. **Falls, trips, slips:** falls of persons from heights (e.g., trees, buildings, scaffolds, ladders, etc.) and into depths (e.g., wells, ditches, excavations, holes, etc.) or falls of persons on the same level.

7. **Fire & explosion:** exposure to or contact with fires or explosions.

8. **Electrocution:** exposure to or contact with electric current.

9. **Homicide:** a killing of one human being by another.

10. **Medical Issue:** a bodily disorder or chronic disease.

11. **Suicide:** the act or an instance of taking, or attempting to take, one’s own life voluntarily and intentionally.

12. **Others:** any other cause that resulted in a fatality or injury to workers or members of the public.

*Vehicle Traffic*

13. **Project Vehicle Work Travel:** traffic accidents in which project workers, using project vehicles, are involved during working hours and which occur in the course of paid work.

14. **Non-project Vehicle Work Travel:** traffic accidents in which project workers, using non-project vehicles, are involved during working hours and which occur in the course of paid work.

15. **Project Vehicle Commuting:** traffic accidents in which project workers, using project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.

16. **Non-project Vehicle Commuting:** traffic accidents in which project workers, using non-project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.

17. **Vehicle Traffic Accident (Members of Public Only):** traffic accidents in which non-project workers/members of the public are involved in an accident while travelling for any purpose.

**Part B: To be completed within 24 hours - SEA/SH**

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| --- | --- | --- |
| **B1: Incident Details** | | |
| **Date of incident intake by the project/GM:** | **Date Reported to PIU:** | **Date Reported to WBG:** |
| **Reported to project/GM by:**  Survivor  Third party  Other: \_\_\_\_\_\_\_  **Is a record of this incident in GM?**  Yes No | **Reported to PIU by**:  GM operator  Directly, by Survivor  Directly, by third party  Other: \_\_\_\_\_\_\_ | **Reported to WBG by**:  PIU  Directly, by Survivor  Directly, by third party  Other: \_\_\_\_\_\_\_ |

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| **B2**: **Incident type (please check all that apply)** See Appendix 1 for definitions |
| **Sexual exploitation**  **Sexual abuse**  **Sexual harassment** |

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| --- | --- |
| **B3: Provide the following details from the GM record** | |
| Age of survivor (if recorded in GM): | Have the national legislation or mandatory reporting requirements been followed? Yes  No |
| Sex of survivor (if recorded in GM):  Male Female  Other | Was the survivor referred to service provision?[[1]](#footnote-2)  Yes No |
| Is the survivor employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes No | Is the alleged perpetrator employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes No |

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| --- | --- |
| **B4: Basis for further action** | |
| a. Has the complainant provided informed consent to lodge a formal complaint? Yes  No | c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes  No |
| b. Does the employer have a suitable administrative process and capacity in place to investigate misconduct relating to SEA/SH in a survivor-centered way?  Yes  No | d. Has the complaint been filed anonymously or through a third party? Yes  No |
| **If the answer to any of these questions is no, has the GM assessed the risks and benefits of carrying out an investigation into the alleged misconduct, taking into account the survivor’s safety and wellbeing?** Yes No | |
| **Will an investigation into misconduct be undertaken in addition to an investigation into adequacy of project systems, processes or procedures?** Yes No | |

**Appendix 1: Incident Types**

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| --- | --- |
| **Incident Type** | **Example** |
| **Sexual Exploitation**:  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.  In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from a Bank financed Goods, Works, Non-consulting Services or Consulting Services is used to extract sexual gain. | * A community member is promised employment on the World Bank financed project site in exchange for sex * A member of the project team connecting water lines to homes requests a sexual favor for access to water connection * A project worker denies passage of a woman through the worksite unless she performs a sexual favor |
| **Sexual Abuse**:  Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.  In Bank financed operations/projects, sexual abuse occurs when a project related worker (contractor staff, subcontractor staff, supervising engineer) uses force or unequal power vis a vis a community member or colleague to perpetrate or threat to perpetrate an unwanted sexual act. | * A project worker abuses a community member * A project worker has a sexual relationship with a child * A project worker befriends a child, supporting her and/or her family in exchange of sexual favors * A project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member * A project worker touches an administrative staff member’s body. * A supervisor for a subcontractor asks his female colleague to join him for a business dinner with the main contractor.  After dinner he asks her to entertain “the boss” in his room as an appreciation for the contract and her work. |
| **Sexual Harassment**: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.  In Bank financed operations/projects, sexual harassment occurs within the context of a subcontractor or contractor and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favor or acts of a sexual nature that are offensive and humiliating among the same company’s employees. | * A worker sends sexually explicit text messages to a coworker * A colleague leaves an offensive picture that is sexually explicit on a co-worker’s desk * A project worker asks all female employees to great him with a kiss on the cheek every day before work. * A project worker compliments his co-worker’s body. * A project worker continuously invites a co-worker out for drinks or dinner after being told that they are not interested. |

**Part C: To be completed following investigation – SEA/SH**

|  |  |  |
| --- | --- | --- |
| **C1: Findings of the investigation** | | |
| Have sanctions against a perpetrator been recommended as part of an investigation into misconduct? Yes **☐** No **☐** | Has an investigation into adequacy of project systems, processes or procedures been undertaken? Yes ☐ No ☐ | |
| **C2: Corrective actions to be implemented (To be fully described in Corrective Action Plan)** | | |
| **Short Description of Action (SEA/SH examples)** | **Responsible Party** | **Timeline for completion/Status** |
| *Referral of Survivor to holistic care services* |  |  |
| *Undertake disciplinary investigation in accordance with GM timelines and confirmed process* |  |  |
| *Disciplinary actions, including sanctions, to be applied following misconduct investigation by Employer* |  |  |
| *Increased training on Codes of Conduct (CoC)* |  |  |
| *Audit of implementation of SEA/SH safety mitigation* |  |  |
| *Strengthened awareness training on project-related risks, CoC and how to report incidents for project-affected community* |  |  |
| *Training for project supervisors on the need to follow guidelines of behaviour in CoC and their supervisory responsibilities* |  |  |
| *Plan to improve coverage/quality of service provision* |  |  |
| *Any other system strengthening measures or corrections for system failures that are necessary* |  |  |

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| **C3: For incidents involving a Contractor:** |
| Has the incident been referred to the DAAB? Yes  No |

**Part B: To be completed within 24 hours - SOGI**

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| --- | --- | --- |
| **B1: Incident Details** | | |
| **Date of incident intake by the project/GM:** | **Date Reported to PIU:** | **Date Reported to WBG:** |
| **Reported to project/GM by:**  Victim**1**  Third party  Other: \_\_\_\_\_\_\_ | **Reported to PIU by**:  GM operator  Directly, by victim**1**  Directly, by third party  Other: \_\_\_\_\_\_\_ | **Reported to WBG by**:  PIU  Directly, by victim**1**  Directly, by third party  Other: \_\_\_\_\_\_\_ |

1. If reporting is by victim care must be taken to adhere to any requests for anonymity.

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| **B2**: **Incident type requiring confidentiality (please check all that apply)** |
| **Violence on basis of SOGI**  **Discrimination on basis of SOGI**  See Appendix 1 for definitions |

|  |  |  |  |
| --- | --- | --- | --- |
| **B3: Basis for further reporting** | | | |
| 1. Has the victim provided informed consent for this incident to be reported? Yes  No | | 1. Does national legislation or mandatory reporting apply to this case? Yes  No 2. If yes, has it been reported? Yes  No | |
| **If the answer to both a. & b. questions is NO, further reporting of this allegation is not required.**  **However, further measures to strengthen SOGI prevention and mitigation on the project should be provided below.** | | | |
| **Further measures to strengthen SOGI prevention and mitigation** | | | |
| **Short Description of Action** (*Examples: Please replace text in italics below with brief description of actions to be taken*) | **Responsible Party** | | **Expected Date** |
| *Increased training on Codes of Conduct (CoC) and non-discrimination on the basis of SOGI* |  | |  |
| *Safety audit of project site focussing on SOGI* |  | |  |
| *Verification all employees sign and understand CoC* |  | |  |
| *Strengthened awareness on project-related risks, CoC and how to report incidents for project-affected community* |  | |  |
| *Active outreach to local civil society organisations working with social and gender minorities to ensure continuous risk monitoring and adaptation* |  | |  |
| *Training for project supervisors on the need to follow guidelines of behaviour in CoC and their supervisory responsibilities* |  | |  |
| *Plan to improve coverage/quality of service provision* |  | |  |
| *Additional training for GM focal points* |  | |  |
| *Other (please detail)* |  | |  |

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| --- | --- |
| **B4: If consent has been provided or national legislation mandates reporting of the incident as indicated in B3, provide the following details from the available GM record** | |
| Age of victim (if recorded in GM): |  |
| Sex of victim (as recorded in GM): | Male Female  Other |
| Has the victim self-identified as sexual or gender minority or are there indications that the case is related to SOGI (i.e., use of homo- or transphobic language)? | Yes No |
| Was the victim referred to service provision? | Yes No |
| Is the alleged perpetrator employed by the project (as indicated by the victim and reported in the GM)? | Yes No |

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| --- | --- |
| **B5: Basis for investigation** | |
| Has the victim provided informed consent for this incident to be investigated? | Yes No |
| **If the answer to this question is yes, complete part C below using the results of the investigation** | |

**Appendix 1: Incident Types**

**Violence on the basis of SOGI:**

The threat or use of physical force that injures or abuses a person, or damages or destroys property, and that is motivated in whole or in part by the victim’s real or perceived sexual orientation, gender identity, gender expression, or sex characteristics.

**Discrimination on the basis of SOGI**:

Discrimination means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person based on their real or perceived sexual orientation, gender identity, gender expression, or sex characteristics from being on an equal basis with others.

**Part C: To be completed following investigation where further reporting is permitted (see Incident Form SOGI Part B)**

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| --- | --- | --- |
| **C1: Corrective actions from the investigation to be implemented (to be fully described in Corrective Action Plan)** | | |
| **Short Description of Action** (*Examples: please replace text in italics below with brief description of actions to be taken*) | **Responsible Party** | **Expected Date** |
| *Referral of victim to holistic care services* |  |  |
| *Disciplinary actions, including sanctions, to be applied following misconduct investigation* |  |  |
| *Measures to prevent similar instances from happening in the future* |  |  |
| *Measures to address gaps in procedural manuals or implementation of procedures that contributed* |  |  |
| *Measures to change/modify program practices to prevent recurrence* |  |  |
| *Where additional training might be needed* |  |  |

# Annex 2: Code of Conduct

**code of conduct**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, staff at the PIU in [name of Ministry/Agency where the PIU sits) for the Project [name of Project], acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project’s occupational health and safety (OHS) requirements, and preventing Gender Based Violence (GBV), including sexual exploitation and abuse (SEA), and sexual harassment (SH) at the workplace, is important in and outside the context of this project, as further set out in this Code of Conduct. As such, we acknowledge this Code of Conduct identifies the behavior that is expected of all PIU staff for the Project [name of the Project].

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.

For the purpose of this Code of Conduct, it is important to note that GBV is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed (that is, gender) differences between male and female individuals. GBV includes acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV includes the following concepts:

* **Sexual Exploitation and Abuse (SEA):** Sexual exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
* **Sexual harassment (SH):** occurs between personnel and staff of the project and means any unwelcome sexual advance, request for sexual favors, and other verbal or physical conduct of a sexual nature.

A violation to this Code of Conduct, including failure to follow ESHS and OHS standards, or engaging in activities constituting GBV including SEA/SH—be it on the workplace, work sites, work site surroundings, at workers’ camps, or the surrounding communities—, constitute acts of serious misconduct, which contravenes the terms of employment, and are therefore grounds for disciplinary action up to and including termination of employment for PIU staff. Acts that may violate the laws of Saint Lucia will be additionally referred to the corresponding legal authorities, including for potential prosecution under the Criminal Code.

**Commitments under this Code of Conduct**

I agree that while working on the project I shall:

General:

1. carry out my 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 Project staff, workers, and any other person.

Regarding ESHS and OHS

1. Attend and actively partake in training courses related to ESHS and OHS as requested by my employer.
2. Always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
3. Implement the OHS Management Plan.
4. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties.
5. Report work situations that are not safe or healthy and remove myself from a work situation which I reasonably believe presents an imminent and serious danger to my life or health.

Regarding equality of opportunity and treatment

1. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

Regarding discrimination and violence based on gender

1. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
2. Not engage in SEA with project beneficiaries and members of the surrounding communities.
3. Not engage in sexual harassment with other project personnel and staff —for instance, comments on the appearance of another worker (either positive or negative) and sexual desirability. making unwelcome sexual advances, looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; and offering or giving personal gifts.
4. Not engage in sexual favors —for instance, making promises of favorable treatment (e.g. promotion), threats of unfavorable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
5. Unless there is the full consent[[2]](#footnote-3) by all parties involved, not have sexual interactions with members of the surrounding communities or work colleagues. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.

Regarding children under the age of 18

1. Not engage in any form of sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child or his/her consent is not a defense or excuse.
2. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
3. Wherever possible, ensure that another adult is present when working in the proximity of children.
4. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
5. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
6. Refrain from hiring children below the minimum age of 18.
7. Comply with all relevant local legislation, including labor laws in relation to child labor.
8. When photographing or filming a child for work related purposes, I must:
9. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
10. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
11. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive way. Children should be adequately clothed and not in poses that could be sexually suggestive.
12. Ensure images are honest representations of the context and the facts.
13. Ensure file labels do not reveal identifying information about a child when sending images electronically.

**Disciplinary measures**

The Ministry of Health and Wellness (MOHW) shall be responsible for making decisions on the specific sanctions to be imposed on workers for violations to this Code of Conduct. I understand that if I breach this Code of Conduct, the MOHW will take disciplinary action according to the seriousness of the offense which could include:

* verbal notification (For Public Officers)/ warning for PIU staff employed by the PS
* written notification (For Public Officers)/ warning for PIU staff employed by the PS
* termination of employment

Infringements sanctioned with verbal notification

Those behaviors that do not cause relevant risks to the MOHW, other workers and/or its relationship with the communities. Verbal warnings may involve a reminder of the Code of Conduct and its applicability.

Infringements sanctioned with written notification

Those behaviors that cause minor risk to the MOHW, other workers and/or its relationship with the communities and/or the environment.

Infringements sanctioned with termination of employment

Those behaviors that cause substantive risks to the MOHW, other workers and/or its relationship with the communities and/or the environment, or behaviors that constitute serious misconduct in accordance with this Code of Conduct. In such cases, the termination of employment may be accompanied by a referral to the corresponding legal authorities. Cases of SEA or SH will always be considered serious misconduct. Recurrent offences to the Code of Conduct will also be considered serious misconduct.

Termination of employment shall be carried out in accordance with the Labor Code of St. Lucia.

*I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met; that I will adhere to the occupational health and safety management plan; and, that I will avoid actions or behaviors that could be construed as GBV, including SEA and SH. Any such actions will be a breach of this Code of Conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, agree to comply with the standards contained herein, and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV issues. I understand that any action inconsistent with this Code of Conduct or failure to act, may result in disciplinary action.*

Staff Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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1. When a complaint is filed by a third party, or the survivor has not reached out to the project, the project may not be able to confirm this information. In these cases, it may not be advisable for the project GM to attempt to reach the survivor, as this may jeopardize confidentiality, safety, and agency. Projects may attempt to find safe ways to pass information indirectly (such as through broad efforts to inform) about services available. [↑](#footnote-ref-2)
2. **Consent** is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. For the purpose of this Code of Conduct, consent cannot be given by children under the age of 18, even if national legislation introduces a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense. [↑](#footnote-ref-3)