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:

- 6. Strengthening Teaching and Learning in Secondary Education.
- 7. Supporting Quality and Resilient School Infrastructure.

- 8. Strengthening Information Systems and Strategies for Student Retention.
- 9. Providing Technical Assistance (TA), Strengthening Institutional Capacity, and Project Management.
- 10. 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



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

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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.

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Legislation/Regulation	Applicability to the Project	Entity Responsible
The Natural Resources	The NRCA Act provides for the management,	National
Conservation	conservation, and protection of the Natural	Environment and
Authority (NRCA)	resources and it's the main Environmental Act	Planning Agency
Act (1991)	for Jamaica. The proposed redevelopment may	(NEPA)
	require an EIA and permit.	
The Natural Resources	Under the NRAC Act of 1991, the NRCA is	NEPA
Conservation	authorized to issue, suspend and revoke	
Authority (Permits	permits and licenses if facilities are not in	
and Licenses)	compliance with the environmental standards	
(Amendment)	and conditions of approval stipulated.	
Regulations (2015)		
The Natural Resources	These regulations require that separate licenses	NEPA
Conservation	be acquired to construct, operate, and discharge	
Authority (Wastewater	effluent for a wastewater or sewage treatment	
and Sludge)	plant. If a permit is granted, the developer	
Regulations, (2013)	would be required to monitor the effluent	
	quality based on the frequency outlined in the	

Table 1: Relevant National Legislations and Regulations and Possible Link to the Project

Legislation/Regulation	Applicability to the Project	Entity Responsible
	terms and conditions of the license and submit reports accordingly.	
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

Legislation/Regulation	Applicability to the Project	Entity Responsible	
Public Health Act	This Act governs all matters concerning Vector	Environmental	
(1974)	Control, Food Safety, Occupational Safety and	Health Unit –	
	Health, Port Health, and Quarantine, Building	Ministry of Health	
	and Subdivision Plans (approving appropriate	and Wellness	
	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.		

## 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 the Bank's ESF is available on 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/sustainabil ity-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 2: 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	<ul> <li>Erect barriers <ul> <li>and</li> <li>signage/hoarding</li> <li>around the</li> <li>construction site.</li> <li>Notify local</li> <li>communities of</li> <li>high-risk</li> <li>activities, such</li> <li>as blasting.</li> <li>Establish an</li> <li>emergency</li> <li>response plan in</li> <li>collaboration</li> <li>with local</li> <li>authorities.</li> </ul></li></ul>	Contractor PIU-ESSO	<ul> <li>Monthly community engagement reports.</li> <li>Community feedback on perceived safety improvements.</li> </ul>
Site Preparation and Construction (Earthworks Excavation, Vegetation Clearance, Trenching and Blasting)	Risk: Noise pollution from machinery and construction activities	Disturbance to local communities	<ul> <li>Schedule noisy activities during daytime hours.</li> <li>Use noise- dampening equipment and</li> </ul>	Contractor PIU-ESSO, Jr. Project Engineer	<ul> <li>Weekly noise</li> <li>level</li> <li>monitoring</li> <li>during</li> <li>construction.</li> <li>Community</li> <li>feedback on</li> </ul>

			install mufflers		noise
			on machinery.		disturbances.
			- Conduct		
			periodic noise		
			level monitoring		
			to ensure		
			compliance with		
			NEPA guidelines		
Air Pollution	Risk: Dust and	Health hazards, environmental	- Regularly	Contractor,	- Biweekly air
	emissions from	degradation	water	PIU-ESSO, Jr.	quality
	construction activities		construction	Project	monitoring.
			sites and	Engineer	
			unpayed roads.		- Inspection of
			and a contraction of the second s		dust
			- Cover		suppression
			construction		measures
			materials during		during site
			transport		visits
			- Use low-		vibito.
			emission		
			equipment		
			- Monitor air		
			quality for		
			compliance with		
			NEPA standards		
			- Provide at least		
			two weeks' prior		
			notice to		
			communities		
			bafara		
			Deloie		
			boging		
Soil Freeien	Pick: Uncontrollad	Loss of topsoil increased	Clear only	Contractor	Site
	NISK. Uncontrolled	sedimentation	- Clear only	DILLESSO	- Sile
	and execution	scumentation	designated areas	110-2350	anspections to
	and excavation		at a time		stabilization
			at a time.		Staumzation
			- Replant cleared		ineasures are
			areas		implemented.

		T	1		
Solid and Hazardous Waste Management	Risk: Construction waste accumulation	Pollution, health risks	immediately after construction. - Install sediment controls at property boundaries, particularly in drainages. - Store waste in designated areas. - Reuse or recycle construction materials where feasible. - Dispose of waste at NSWMA- approved sites	Contractor, NSWMA	- Waste disposal logs and receipts from approved sites. - Monthly inspections of waste storage and disposal areas.
			prevent dust and		
Environmental and	Pisk of Exposure to and	Improper handling storage or	erosion.	Contractor	Weekly
Environmental and Occupational Health Risks	KISK 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.	<ul> <li>Identify and classify all hazardous materials used or generated during project activities.</li> <li>Train workers on safe handling, storage, and disposal procedures in line with national regulations.</li> </ul>	PIU-ESSO	<ul> <li>weekiy inspections of hazardous material storage and disposal areas.</li> <li>Maintain waste tracking records and disposal receipts.</li> <li>Conduct random safety audits and</li> </ul>

			- Use proper		verify training
			PPE and provide		records.
			spill kits and		- Report and
			emergency		investigate all
			response		spills or
			equipment on		incidents
			site.		involving
			- Store		hazardous
			hazardous waste		materials.
			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.		
Biodiversity Loss	Risk: Unregulated site	Displacement of wildlife, loss of	- Conduct	Contractor,	- Pre-
	preparation	vegetation	biodiversity	PIU-ESSO	construction
			assessments		biodiversity
			before		surveys
			construction.		Regular
					monitoring of
			- Implement		conservation
			conservation		efforts.
			plans.		
			- Avoid		
			construction in		
			ecologically		
			sensitive zones.		

Transportation of Materials	Traffic congestion and safety risks	<ul> <li>Develop and implement a traffic management plan.</li> <li>Schedule material transport during off-peak hours.</li> <li>Use flagmen to direct traffic near construction zones.</li> <li>Install road safety signs near the project site.</li> <li>Communities must be given prior notice of intended road closures and designated detours.</li> </ul>	<ul> <li>-Compensate for trees removed by planting new trees</li> <li>-Significant efforts should be made to preserve large trees and those of high economic value.</li> <li>-Weekly traffic management plan updates.</li> <li>-Observations of compliance during site inspections.</li> </ul>	-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
		designated detours.			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.	<ul> <li>Use clean, uncontaminated equipment to excavate pits, especially when groundwater contact is likely.</li> <li>Implement</li> </ul>	Contractor	Regular water quality testing in and around the site; compliance with environmental

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.	protective barriers to prevent contamination runoff. - Dispose of contaminated materials safely at approved waste sites. - Train workers on best practices for handling hazardous materials. - Mark the perimeter of all excavated pits with caution	Contractor	safety guidelines. Continual assessment throughout implementation, doily sofety
			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		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.	lighting around excavation areas to improve visibility. - 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.	Contractor	Daily inspections of excavation sites; emergency preparedness plans for collapse incidents.
			conditions. - Monitor soil stability throughout construction activities.		
	1	Occupational Health & Safety Risks	8	1	ſ
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	Contractor, PIU-ESSO	- Daily safety inspections Record of training sessions conducted and attendance

					1
			protocols		Incident and
			Restrict site		accident logs.
			access to		
			authorized		
			personnel only.		
			- Implement		
			GRM with		
			confidential		
			reporting		- Maintain
			Provide		records of
RISK OI SEA/SH	Risk: Incidents		mandatory	DULESSO	SEA/SH-related
(Sexual Exploitation,	involving workers and	Safety and reputation risks	SEA/SH training	PIU- ESSO,	grievances
Abuse, and	community members		for all workers	Contractors	Conduct post-
Harassment)			Require all		training
			workers to sign a		assessments.
			Code of Conduct		
			(Refer to Annex		
			2).		
Construction Risk	Risk of Scaffolding	Faulty scaffolding installation or use	No live trees	Contractor,	Weekly safety
	Collapse or Unsafe	of inadequate materials could result in	shall be cut and	Site Engineer	inspections of
	Installation	worker injuries, fatalities, and project	used for building	C C	scaffolding.
		delays. Additionally, reliance on	scaffolding.		Immediate post-
		unapproved materials, such as live	Steel or lumber		event
		trees, can cause environmental	supports for		inspections
		damage and structural instability.	scaffolding must		after storms or
			be obtained from		seismic activity.
			an approved		Incident log for
			supplier.		scaffolding-
			Scaffolding		related
			should be		accidents.
			installed by		Training
			trained		attendance
			professionals		records for
			and tested		workers
			frequently		handling
			throughout the		scaffolding
			project life		sourceanig.
			Scaffolding		
Construction Risk	community members          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.	for all workers Require all workers to sign a Code of Conduct (Refer to Annex 2). 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	Contractor, Site Engineer	Conduct post- training assessments. 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.

			should be		
			checked		
			immediately		
			after hazardous		
			events such as		
			storms or		
			earthquakes.		
			Workers should		
			be provided with		
			fall protection		
			gear such as		
			harnesses and		
			quardrails		
			Conduct regular		
			safety training		
			for all workers		
			handling		
			scaffolding.		
Cultural Heritage Risks	Risk of Cultural	Excavation activities may	- Develop a	Contractor,	- Conduct
C	Heritage Disruption	inadvertently disturb historical or	comprehensive	Jamaica	regular site
	During Excavation and	cultural artifacts, leading to the loss of	cultural heritage	National	inspections
	Site Preparation	heritage, legal complications, and	management	Heritage Trust,	during
	1	project delays.	plan to guide	St. Ann	excavation to
			excavation	Municipal	monitor cultural
			activities.	Corporation,	artifacts.
			- Train workers	Jr. Project	- Maintain
			on 'chance find'	Engineer, PIU-	thorough
			procedures to	ESSO	documentation
			ensure proper		of any chance
			handling of		finds and
			discovered		resolution
			artifacts.		actions.
			- Collaborate		- Ensure
			with heritage		compliance
			authorities such		with national
			as the Jamaica		and
			National		international
			Heritage Trust		cultural heritage

			1	1	1
			and local		preservation
			municipal		guidelines.
			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.		
		Social Risk			
			- Ensure		Design
			universal design		- Design
A agassibility for	Disk: Evolution due to		principles,		ieviews to
Persons with	lack of accessible	Limited access for students and staff	including ramps,	Consultant,	compliance
Disabilition	infrastructure	with disabilities	tactile paving,	PIU-ESSO	with
Disaonnues	minastructure		accessible		with
			restrooms, and		standarda
			wider doorways.		stalluarus.
			- Conduct		
			participatory		- Maintain
	Disk: Look of input		consultations,		consultation
Community	from community	Pasistance lack of local ownership	particularly with	PIU- ESSO,	records
Engagement	momborg	Resistance, lack of local ownership	persons with	CDC, CBOs	Integrate
	members		disabilities,		feedback into
			parents, and		design updates.
			educators.		
Governance Risks	Risk of Unresolved or	Failure to address grievances	- Implement the	PIU,-ESSO	- Quarterly
	Mishandled Grievances	effectively may lead to stakeholder	project GRM	Contractor	grievance
		dissatisfaction, community resistance,	with multiple	(with its own	summary
		and potential project delays.	submission	GRM)	reports.

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.	<ul> <li>channels (e.g., hotline, email, in-person).</li> <li>Train PIU staff on grievance handling, including SEA/SH protocols.</li> <li>Maintain a grievance log for tracking and resolution to ensure transparency.</li> <li>Develop a site- specific Emergency Response Plan (ERP).</li> <li>Conduct amorganey drills</li> </ul>	Contractor, Local Emergency Services	<ul> <li>Stakeholder satisfaction surveys on the GRM's accessibility and effectiveness.</li> <li>Review of ERP compliance during drills.</li> <li>Incident response logs.</li> </ul>
			with workers and community representatives. - Provide readily accessible first- aid kits and firefighting equipment at project sites.		updates to the ERP based on emerging risks.
Social Safeguards Risks	Risk of SEA/SH	Unaddressed SEA/SH incidents may	- Implement a	PIU-ESSO,	- Maintain
	Incidents Involving	lead to harm to affected individuals,	GRM that	Contractors	records of
	Workers and	reputational damage, and non-	includes		SEA/SH-related
	Community Members	compliance with safeguarding	confidential		grievances and
		policies.	reporting and		responses.
			survivor-		- Conduct
			centered		periodic

	1			1	1
			response		reviews to
			mechanisms.		assess response
			- Conduct		effectiveness.
			awareness		
			campaigns and		
			ensure access to		
			support services		
			for affected		
			individuals.		
Social Safeguards Risks	Lack of Awareness	Workers may unknowingly engage in	- Provide	PIU-ESSO	- Maintain
	among Workers About	inappropriate behavior, increasing the	mandatory	Contractors	training
	SEA/SH and Workplace	risk of SEA/SH incidents and	SEA/SH training		attendance logs.
	Behavior Expectations	workplace misconduct.	to all workers,		- Conduct post-
			including		training
			contractors and		assessments to
			the Supervising		measure
			Engineer.		awareness
			- Conduct		improvements.
			refresher		
			training sessions		
			to reinforce		
			behavioral		
			expectations.		
Equity and Inclusion	Risk of Exclusion of	Failure to incorporate accessibility	- Ensure	PIU-ESSO,	Risk of
Risks	Vulnerable Groups in	features and targeted outreach efforts	accessibility	Contractor	Exclusion of
	Project Design	may result in the exclusion of persons	features in all		Vulnerable
	, ,	with disabilities, elderly individuals,	project designs,		Groups in
		and marginalized communities from	including ramps.		Project Design
		benefiting fully from the project.	tactile paving.		5 8
			accessible		
			restrooms, and		
			wider doorways.		
			- Conduct		
			targeted		
			outreach		
			programs to		
			engage		
			vulnerable		
			vumerable		

			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.		
Equity and Inclusion	Risk of Gender-Based	Failure to implement gender-sensitive	- Develop	PIU-ESSO	- Periodic
Risks	Exclusion in	policies may result in women's limited	gender-sensitive		review of
	Employment and	participation in employment	employment and		gender-focused
	Decision-Making	opportunities and decision-making	training		program
	8	processes, leading to gender	programs to		outcomes.
		disparities in project benefits.	promote		- Development
		1 1 5	women's		of Gender
			inclusion.		Monitoring,
			- Ensure active		Evaluation, and
			participation of		Learning
			women in		(GMEL)
			consultations,		framework.

planning, and	- Maintain
decision-making	records of
processes.	women's
- Implement	participation in
gender-	consultations
responsive	and training
workplace	programs.
policies,	- Track gender-
including safe	disaggregated
work	employment
environments	data to assess
and family-	progress on
friendly policies.	gender
- Conduct	inclusivity.
awareness	5
campaigns on	
gender equity	
and	
empowerment	
within the	
project.	
Labor and Employment Risk of Labor Rights Failure to uphold fair labor standards - Enforce PIU- ESSO.	- Conduct
Risks Violations. Including may result in worker exploitation. compliance with Contractor	periodic labor
Unfair Wages and Poor disputes, low productivity, and the Labor	audits to verify
Working Conditions reputational damage for the project. Management	contract
Procedures	compliance and
(LMP) to protect	adherence to
workers' rights	fair labor
- Ensure fair	standards
wages and	- Monitor
benefits for all	orievance
workers	records and
adhering to	resolution
pational labor	efficiency to
lowe and	
laws and	ensure worker
international	ensure worker concerns are
international best practices	ensure worker concerns are addressed

			worker		compliance
			protections.		with Labor
			including access		Management
			to grievance		Procedures
			mechanisms for		(I MP) through
			reporting labor-		routine
			related issues		inspections and
			- Conduct		reporting
			training sessions		reporting.
			for contractors		
			and project staff		
			on labor rights		
			and ethical		
			employment		
			practices		
			Prioritiza local		Track
			- FIIOIIIZE IOCAI		- ITACK
Hiring of Local	Pick: Exclusion of local		skilled and semi	Contractors	local hires
Workers	labor	Community dissatisfaction	skilled	DILLESSO	Deport
workers	12001		skilleu	FIU-E350	amployment
					data
		Emorgonov Pronaradnoss	activities.		dala.
			Peport all		
			accidents to the		
			MoEV/DILL and		
			World Donk		
			world Bank		- Review ERP
			Within 48 nours		compliance
			(Refer to Annex	<b>C</b> ( )	during drills
			1).	Contractor,	Incident
Construction Accidents	Risk: Inadequate	Delayed response, increased casualties	- Develop a site-	Local	response logs
& Natural Disasters	response to emergencies		specific	Emergency	Annual updates
			Emergency	Services	to the ERP
			Response Plan		based on
			(ERP) Conduct		emerging risks.
			emergency drills		88
			with workers		
			and community		
			representatives		

Provide accessible first-	
aid kits and	
firefighting	
equipment at	
project sites.	

## 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	(876) 972-2615 or (876) 972-
	Corporation)	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.

## <u>PIU</u>

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 noncompliance 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:
  - 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.
  - ii. Fires Fire extinguishers and/or other response measures must be placed at the working sites and training should be provided on usage.
  - iii. 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.

<b>Environmental and Social</b>	Frequency	Locations
Criteria		
	Air Quality	
Evidence of dust	Continuous	Around active construction
accumulation and	Continuous	zones
suspended particles		Zones
through visible observation		
Deriodical chaolic with		
	Noise	
Decibel levels	Weekly	Around active construction
		zones
	Water Quality	
Visual observation for	As needed, or after periods	Water sources near the
sedimentation and oil and	of heavy rainfall	project site
grease		
	Waste Management	
Compliance with CESMP	Daily	Waste receptacles, disposal
and waste management		sites, and active
practices		construction sites
Littering and waste		
accumulation		

#### Table 4: ESHS Monitoring During Project Construction

	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	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	Quarterly audits	HR department				

labor laws and World Bank ESS2			
Equal opportunity for vulnerable groups (women, persons with disabilities, marginalized youth)	Quarterly	Employment tracking and recruitment reports	
SE	A/SH Prevention and Respo	nse	
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	
Sta	akeholders Wellbeing/Conce	rns	
<ul> <li>Grievances which may arise</li> <li>Disruption to community activities</li> <li>Compliance with the Workers Code of Conduct</li> <li>Any emerging issue</li> </ul>	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.

#### <u>Contractor</u>

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:

- i. **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).
- ii. 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.
- iii. 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.
- iv. **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.

- v. 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.
- vi. **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.
- vii. **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.
- viii. 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.
- ix. 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.
- x. **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.
- xi. **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.
- xii. **SOGI**: Violence on the basis of SOGI or Discrimination on the basis of SOGI.
- xiii. **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

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) <sup>1</sup>
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 🗖
<sup>1</sup> See Annex 1 for definitions

#### **B3: Description/Narrative of Incident**

Please replace text in italics with brief description, noting for example:

- I. What is the incident?
- II. What were the conditions or circumstances under which the incident occurred (if known)?
- *III.* Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?
- *IV.* Is the incident still ongoing or is it contained?
- V. Have any relevant authorities been informed?

#### B4: Actions taken to contain the incident

Short Description of Action	Responsible Party Expected Date					

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.

B5: What support has been provided to affected people

## **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

C1: Inv	vestigation Findings
Please	e replace text in italics with findings, noting for example:
Ι.	where and when the incident took place,
11.	who was involved, and how many people/households were affected,
<i>III.</i>	what happened and what conditions and actions influenced the incident,
IV.	what were the expected working procedures and were they followed,
V.	did the organization or arrangement of the work influence the incident,
VI.	were there adequate training/competent persons for the job, and was necessary and suitable equipment available,
VII.	what were the underlying causes; where there any absent risk control measures or any system failures,

C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)				
Action	Responsible Party	Expected		
		Date		

# Part C cont.: To be completed following investigation

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 🗆
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

<sup>2</sup>See Annex 2 for definitions

## 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 $\Box~$ 5. Other $\Box~$ 6. No Compensation Required $\Box~$

Name	Compensation Type	Amount (US\$)	Responsible Party

4: Supplementary Narrative

# 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.
- 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

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

B2: Incident type (please check all that apply) See Appendix 1 for definitions

#### Sexual exploitation Sexual abuse Sexual harassment

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 $\Box$ No $\Box$
Sex of survivor (if recorded in GM):	Was the survivor referred to service provision? <sup>1</sup>
Male $\Box$ Female $\Box$ Other $\Box$	Yes 🗆 No 🗖
Is the survivor employed by the project (as indicated by	Is the alleged perpetrator employed by the project (as
the survivor or complainant and reported in the GM)?	indicated by the survivor or complainant and reported in
Yes 🗆 No 🗆	the GM)? Yes □ No □

B4: Basis for further action		
a. Has the complainant provided informed consent to	c. Has the survivor provided informed consent to be part	
lodge a formal complaint? Yes $\Box$ No $\Box$	of an investigation into misconduct? Yes $\Box$ No $\Box$	
b. Does the employer have a suitable administrative	d. Has the complaint been filed anonymously or through	
process and capacity in place to investigate misconduct	a third party? Yes 🗆 No 🗆	
relating to SEA/SH in a survivor-centered way?		
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 D No D		

# **Appendix 1: Incident Types**

Incident Type

Example

<sup>&</sup>lt;sup>1</sup> 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.

<b>Sexual Exploitation</b> : 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.	<ul> <li>A community member is promised employment on the World Bank financed project site in exchange for sex</li> <li>A member of the project team connecting water lines to homes requests a sexual favor for access to water connection</li> <li>A project worker denies passage of a woman through the worksite unless she performs a sexual favor</li> </ul>
<b>Sexual Abuse</b> : 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.	<ul> <li>A project worker abuses a community member</li> <li>A project worker has a sexual relationship with a child</li> <li>A project worker befriends a child, supporting her and/or her family in exchange of sexual favors</li> <li>A project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member</li> <li>A project worker touches an administrative staff member's body.</li> <li>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.</li> </ul>
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.	<ul> <li>A worker sends sexually explicit text messages to a coworker</li> <li>A colleague leaves an offensive picture that is sexually explicit on a co-worker's desk</li> <li>A project worker asks all female employees to great him with a kiss on the cheek every day before work.</li> <li>A project worker compliments his co-worker's body.</li> <li>A project worker continuously invites a co-worker out for drinks or dinner after being told that they are not interested.</li> </ul>

# **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 I No I	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	Responsible Party	Timeline for
examples)		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		

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

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

B1: Incident Details		
Date of incident intake by the project/GM:	Date Reported to PIU:	Date Reported to WBG:
Reported to project/GM by:	Reported to PIU by:	Reported to WBG by:
$\Box$ Victim <sup>1</sup> $\Box$ Third party $\Box$	$\Box$ GM operator $\Box$ Directly, by	□ PIU □ Directly, by victim <sup>1</sup>
Other:	victim <sup>1</sup> 🗆 Directly, by third party	Directly, by third party D Other:
	□ Other:	

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

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			
a. Has the victim provided informed consent	for b. Does national legislation	n or mandatory	
this incident to be reported? Yes $\Box$ No $\Box$	reporting apply to this c	case? Yes 🗆 No 🗆	
	c. If yes, has it been report	rted? Yes 🗆 No 🗆	
If the answer to both a. & b. questions is NO, further reporting of this allegation			
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	Responsible Party	Expected Date	
(Examples: Please replace text in italics			
taken)			
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)			

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 🗆

B5: Basis for investigation		
Has the victim provided informed consent for	Yes 🗆 No 🗆	
this incident to be investigated?		
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)

C1: Corrective actions from the investigation to be implemented (to be fully described in Corrective Action Plan)			
<b>Short Description of Action</b> (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

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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

- 3. Attend and actively partake in training courses related to ESHS and OHS as requested by my employer.
- 4. Always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
- 5. Implement the OHS Management Plan.
- 6. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties.
- 7. 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

 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

- 9. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- 10. Not engage in SEA with project beneficiaries and members of the surrounding communities.
- 11. 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.
- 12. 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.
- 13. Unless there is the full consent<sup>2</sup> 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

- 14. 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.
- 15. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
- 16. Wherever possible, ensure that another adult is present when working in the proximity of children.
- 17. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- 18. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
- 19. Refrain from hiring children below the minimum age of 18.
- 20. Comply with all relevant local legislation, including labor laws in relation to child labor.

<sup>&</sup>lt;sup>2</sup> **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.

- 21. When photographing or filming a child for work related purposes, I must:
  - a) Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
  - b) 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.
  - c) 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.
  - d) Ensure images are honest representations of the context and the facts.
  - e) 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 Jamaica.

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: