

The Gambia Education Sector Support Project (GESSP)
**ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN OF THE CONSTRUCTION
SITE (C-ESMP) FOR CLASSROOMS**

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Prime Contractor

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LIST OF ACRONYMS AND ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
CFC	Chlorofluorocarbons
CSEPP	Construction Site Environmental Protection Plan
ECD	Early Childhood Development
ESMF/P	Environmental and Social Management Framework/Plan
ESMPCS	Environmental and Social Management Plan of the for-Construction sites
GBV	Gender-Based Violence
GEESP	The Gambia Education Sector Support Project
HIV	Human Immunodeficiency Virus
HSP	Health and Safety Plan
HW	Hazardous waste
ILO	International Labor Organization
IOS	International Organization for Standardization
IW	Inert Waste
NHW	Non-hazardous waste
PCB	Polychlorinated biphenyls
PPE	Personal Protective Equipment
SC	Specialized Consulting Engineer
SH	Sexual Harassment
SEA	Sexual Exploitation and Abuse
SHES	Environment and Social Health and Safety
STD	Sexually transmitted diseases
STI	Sexually transmitted infections
VAC	Violence Against Children
WB	World Bank
WC	Water Closet
WHO	World Health Organization

1. PROTOCOL FOR CONSULTATION AND CIVIL WORKS UNDER COVID 19 THE GAMBIA EDUCATION SECTOR SUPPORT PROJECT (GESSP) IN THE GAMBIA

1.1 Introduction

The novel coronavirus disease (COVID-19) has been spreading rapidly across the world since December 2019, following the initial cases in Wuhan, Hubei Province, China. Whilst the pandemic imposed enormous strain on the health systems as they try to cope with the increase demand for services, it has also resulted in tremendous economic and social hardship as governments institute measures such as 'social distancing' to limit the spread of the disease. One of the consequences of these measures was the closure of schools, stoppage of civil works, trade and travel, closure of borders, and other economic activities.

UNESCO reports schools in 188 countries have been closed—many for the remainder of the academic year—affecting 89.5 percent of all learners or 1.5 billion persons worldwide.² Immediate action is required to ensure continuity and restarting of economic activities and projects implementation once the pandemic effects reduce or subsides. This is particularly critical in the Bank's least developed client countries like The Gambia.

A key source of guidance on communications, civil works, and stakeholder engagement that the Project will draw on is the Ministry of Health guidelines which are in line with the World Health Organization's (WHO) "COVID-19 Strategic Preparedness and Response Plan: Operational Planning Guidelines to Support Country Preparedness And Response" (2020). These guidelines outline the following approach in their Risk Communication and Community Engagement - Pillar 2.

It will lay the basis for the Project's stakeholder engagement and civil works implementation approach. The project will also draw on other recently-available resources for carrying out the implementation of the civil works in the context of COVID-19, including the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" (March 20, 2020). These guidelines will be taken into consideration for the civil works in order to protect workers, the affected communities and Project staff.

In The Gambia, the first cases of COVID-19 were reported in March 2020, and following a presidential address on March 17, 2020, The Gambia closed all schools and education institutions as a measure to protect children and communities to control the spread of the virus. The school closure directly affects at least 674,300 children from early childhood to senior secondary school. The initial closure was for 21 days, and an extension of the school closure is ongoing and could possibly last at least through the beginning of the next academic year. Immediate action is required to implement the civil works for Education Sector Support Project (GESSP) to prepare school systems to reopen once the pandemic subsides. Currently, the Ministry is collaborating with the media houses for lessons delivery and sensitization of students and communities to stop the spread of COVID-19. This will be extended for the safely preparation and implementation of the civil works of this Project.

The Gambia has declared a state of Emergency, which is still maintained by the Authorities. Given the social distancing recommended in order to stop or reduce the COVID 19 transmission, the Project has decided to elaborate this Protocol in order to implement the upcoming stakeholder sensitization and civil works implementation.

1.2 Methodology

To meet best practice approaches, the Project will apply the following principles for stakeholder engagement and civil works implementation:

- **Openness and life-cycle approach:** public consultations for the Project will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate and accessible format and language; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns
- **Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communication about project activities and development, transparency, accountability and build effective community relationships. The participation process for the project will be inclusive and will consider vulnerable and disadvantaged groups to ensure they can attend and fully participate in discussions. All stakeholders are encouraged to be involved in the consultation process, and this includes ensuring that the time of day of meetings is suitable for women who may have different work schedules and commitments and that persons with disabilities are able to attend and participate. Every community member will have access to information. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods and the time and location of meetings. Special attention should be given to vulnerable groups, in particular women, youth, disabled, elderly and the cultural sensitivities of diverse ethnic groups. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women.
- **Flexibility:** if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet, radio, or TV communication, and communication via mail.
- **A precautionary approach** will guide consultation process and civil works implementation to prevent infection and/or contagion, given the highly infectious nature of COVID-19. **Worker and Community Health and Safety:** to avoid or reduce the risk of contagion or spreading the COVID-19, all workers will wear their mask, goggles and other personal protective equipment (PPE) and respect social distancing protocols at the site. Same measures will be followed in interactions with local communities.
 - **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
 - **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their

vulnerable status¹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women.

1.3 Consideration of impacts on disadvantaged/vulnerable individuals or groups

It is particularly important to understand how project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups who often do not have a voice to express their concerns or may not be considered fully when addressing the impacts of a project. It is equally important that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be undertaken with respect to infectious diseases and medical treatments. Such consultations must be adapted to consider such groups and/or individuals concerns and cultural or other sensitivities and to ensure a full understanding of project activities and benefits. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women. The vulnerability may stem from person's origin, gender, age, health condition, economic status, disability, livelihood, among others. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following: women-headed households, elders, youth, people renting land (especially women renters), youth, elders, and persons with disabilities. Vulnerable groups within the communities affected by the Project will be consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered.

1.4 Strategy

The PIU in collaboration with the stakeholders, and especially with the FIOHG, will identify and examine all the activities planned within the framework of the project requiring the engagement of stakeholders, public consultations, and civil works implementation.

FIOH and the PCU will evaluate the targets, the location, and the size of the proposed activities. Personal contact and large social gatherings or meetings will be limited and all protocols from the Government regarding social distancing will be respected. FIOH will assess the level of risk of spread to the community and how best to align with restrictions in effect at the national level.

In addition, FIOH and PCU will identify the critical activities for which the consultations cannot be postponed without significant impact on the project deadlines. At the end of this exercise, FIOH will consider viable means to obtain the contributions and commitment of stakeholders.

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, health status, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources, among others.

Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered.

Where planned civil work activities require community meetings, FIOH will assess how to put in place proper social distancing and make available PPE such as masks, eye shields, hand sanitizers, etc. for workers and community members.

Before consultation and civil works are able to start, the Project will require FIOH to identify and visit the affected communities.

The objective of this mission will be to:

- The FIOH and the PCU will also assess the media coverage to see which media channels are more suitable for spreading information about COVID-19 preventive measures, who to contact if people are exhibiting symptoms, and how to contact the Grievance Mechanism (GM) should community members have additional questions or concerns.
- According to the affected areas, FIOH and PCU will review the best telecommunication coverage to decide which ones they will use to communicate with communities, taking into account the commitment to inclusive and accessible participation and communication.
- Traditional communication channels will also be assessed to verify how they can be effective in conveying relevant information to stakeholders.

According to the outcomes of this first field visit, FIOH with the PCU will be able to start site preparation and sensitization of affected communities about the ESMP, GM, information about SEA/SH risks, especially around civil works, access to services, and how to lodge complaints through the GM, and COVID-19 mitigation measures that are recommended by the WHO and the Ministry of Health.

Following the field visit, the Project will implement specific measures to mitigate the risk of the COVID-19 transmission.

A precautionary approach will guide the consultation process and the implementation of civil works to prevent transmission and infection, given the highly infectious nature of COVID-19.

The following are some considerations for selecting channels of communication and encouraging behavior for the safe implementation of the civil works, considering the current COVID-19 pandemic. Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered:

- Avoid public gatherings (considering national restrictions or advisories), including public hearings, workshops, community meetings, and in working sites
- As smaller meetings are permitted (Five people with distance of 1.5m distance between participants), consultations will be conducted in small-group sessions, such as focus group meetings. Efforts will be made to conduct meetings through telephone or, if possible, online, channels to reduce risk of contagion or contamination
- Employ channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Communication channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions

- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, online platforms, dedicated phone lines with knowledgeable operators
- communication channels during COVID-19 will also help women receive accurate information about SEA/SH risk, access to services, and the project GM
- Each of the proposed channels of engagement will clearly specify to community members how feedback and suggestions can be provided by stakeholders via the project's GM.

1.5 Management of COVID-19 during civil works

A special COVID-19 induction will be performed for each employee before they are able to start work. Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered. This induction will be entirely dedicated to COVID-19:

- How it spreads
- How to protect oneself (including washing protocols)
- How to properly use PPE (mask and gloves) and requirements of wearing PPE
- Understanding symptoms and what to do if one is exhibiting them
- Understanding the impact of COVID-19 on vulnerable groups (who is vulnerable)

This induction will be renewed for all workers every month and every day before the start of activities, a specific briefing will be carried out by the Site Manager who is the team leader.

The Site Manager will address the following points:

- Reminder of the context and the need to respect the rules
- Reminder of barrier gestures: how to cough, hand hygiene (basins and soap will be always available on site), social distancing and wearing a mask
- Taking of temperature every morning before works start
- Reminder of the exceptional measures applicable to the activities concerned
- Reminder of the main symptoms of COVID-19
- Reminder of the COVID-19 Hotline 1052

Monitoring of symptoms and other hygiene and mitigation protocols:

- Symptoms associated with COVID-19 will be monitored in workers. Each worker should monitor the onset of symptoms for themselves and colleagues and inform their manager immediately if they feel unwell or suspect a colleague is not feeling well. If symptoms appear during the night, the employee notify their superior and not come to the construction site. The procedure applied will then be the same as for employees who will present in the morning with fever.
- FIOH will ensure the transportation to health centers by liaising with the COVID-19 Hotline 1052 in case ambulances of the health centers are not available.
- PPE must be clean and for individual use only (they must not be shared, exchanged, or loaned between employees). Barrier/social distancing against COVID-19 must be applied during break times and meals. Drinking water materials for personnel such as a cup or water bottle must be available for all workers and must not be shared for use among workers. Anyone who is not an employee of FIOHGT, or its service providers is a visitor. Any visitor wanting access to the site must submit to the same COVID-19 mitigation controls as employees.

- Cleanliness, including sanitization, of personnel reception facilities must be maintained regularly throughout the day. Any waste likely to be infected must be managed to avoid any risk of contamination. Given the type of works, there will be very minimal hazardous waste if not any.
- FIOH will delimit the site and provide posters showing measures to be strictly followed by all who are on site.
- It is planned that about 10 people will be each work site. Workers must always wear masks, goggles, and maintain regular hand cleanliness. Hand sanitizers will be available in all strategic areas of the site.
- Equipment to take temperatures for all entering in the work sites should be available. In each site, FIOH will have two thermometers, regularly cleaned to avoid contamination in each site. Taking of temperature and management of the thermometers should be the responsibility of the ESHS officer.
- The contact information of the local COVID-19 committee (set up by the Ministry of Health under the Governor with all the relevant stakeholders in each region) COVID-19 1025 Hotline will be communicated to all workers. The contact number will be posted on site. The Project will closely work with this committee to implement the Project in a safely manner.

In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below:

- All in person meetings (such as consultation meetings, focus group meetings, one on one interviews (respecting social distancing requirements, wearing masks and eye shields)
- Public notices
- Electronic publications and press releases on the MOBSE website, MOBSE TV show and community radios in the Provinces
- Telephone Interviews
- Text messages communication
- Social media notices
- Posters erected in communities

At all times, the following COVID-19 mitigation measures will be followed in engaging with the public:

- Availability of hand sanitizers
- Thermometers in each working site
- Social distancing of 1,5 meters between workers
- Less than 10 people in each site

Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions, such as committees of elders, women, youth, but also communication of religious leaders like imams and the griot (traditional communicators).

In the event none of the above means of communication is considered adequate for the required consultations with stakeholders, FIOH should discuss with the PCU to find out if the activity in question can be postponed at a later date, when significant stakeholder engagement is possible. When it is not possible to postpone the activity or when the postponement is likely to last more than a few weeks, the PCU should consult the World Bank team for advice and guidance.

1.6 Conclusion

During all this process, recommended WHO hygienic practices will be respected and monitored by the PCU safeguards team to ensure that mitigation measures would be properly followed and duly respected. As protocols and recommendations by the WHO changes in response to this pandemic, these protocols will be updated accordingly.

2. BACKGROUND

The Gambia Education Sector Support Project (GESSP or the Project) will serve as successor to the Results for Education Achievement and Development Project (READ). This project will consolidate the achievements made in the sector by emphasizing educational access, and improvement of quality of teaching and learning. The objective of the project is to increase access to Early Childhood Development (ECD) and basic education and improve the quality of teaching and learning.

The Project comprises three main components:

- i) Enhancing access to ECD and basic education
- ii) Improving quality of teaching and learning
- iii) Technical and institutional support

The PCU (Project Coordination Unit) provides coordination and fiduciary management for the implementing directorates and units as well as the reporting of project activities. The PCU is under the direct responsibility and supervision of the Permanent Secretary of the Ministry of Basic and Secondary Education (MoBSE). The PCU reports directly to the Permanent Secretary. PCU staff are selected based on agreed TORs and receive enough training in Bank and donor-financed project implementation.

The PCU ensures overall coordination and supervision of implementation of education projects. It ensures that the various implementation agencies are on track regarding technical aspects of the various activities and the rationalization of the resources. It communicates all the issues that need to be decided at the Steering Committee² level and monitors and evaluates project implementation.

One of the key responsibilities of the PCU is to be the interface with the technical departments to ensure efficient implementation. The PCU has the capacity to provide technical support in procurement, financial management, and project monitoring and evaluation. The PCU supports the technical departments or other implementing units as facilitator of the flow of Credit funds and project resources, and acts as the clearing house for securing decision making on procurement and disbursement of funds on the activities, goods, works and services contracts financed from budgets and appointed grants.

A sub-department of PCU is the construction department. In view of the size of the investment portfolio of the sector in general and the PCU, this department is the nerve center of the PCU. Staffed with a qualified construction management specialist (a Construction Programme Manager (CPM Ebou Gaye) and assisted by other professionals like the social and environmental safeguards officers at the PCU, they will be in charge of the environmental and social supervision and monitoring of this Contractor-ESMP (C-ESMP).

² The Steering Committee includes the main stakeholders of the education sector, especially the Ministry of Finance, Education Youth and Employment, Higher Education, and others as they will guide the Project to ensure smooth implementation. – if there is a full list of those in the committee, please include it here

3. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN OF THE CONSTRUCTION SITE (C-ESMP)

3.1 Environmental and social policy

The Director General of Future In Our Hands The Gambia (FIOHG), as Contractor, clearly defines the company's commitment to environmental, social, safety and health (ESSH) specificities in the context of construction work.

In this commitment, the contractor shall:

- Train their staff on the protection of the environment and health and safety at work and mitigate social risks. Including risks for sexual exploitation and abuse (SEA) and sexual harassment (SH).
- Raise public awareness of the safety measures to be taken to avoid accidents and the means of prevention to reduce the incidence of various diseases (by the NEA and safeguards officers of the PCU), including sexually transmitted diseases, as well as SEA and SH, including monitoring Codes of Conduct to be signed by all workers and provision of awareness-raising and training sessions for workers (by the GBV Consultant in collaboration with the FIOHGT and MOBSE Gender Units to build their capacities)
- Ensure that cases of SEA/SH are referred to the project Grievance Mechanism, if the survivor so desires, and that survivors are provided a survivor-centered and confidential response, including referrals to medical, legal, and psychosocial care and support services (any costs associated with service provision should be covered by the project)
- Involve local authorities in the execution of the project and coordinate the work with the various users of the territory
- Clearly secure work site, erect barriers for trenches and put up signage to mitigate against harm to children, persons with disabilities, and elderly and other vulnerable groups
- Provide physical barriers and enclosures at the work sites to discourage intruders, and protect the local communities (especially vulnerable groups such as persons with disabilities and children) and animals from unnecessary injury
- Have separate, safe and easily accessible bathroom and sanitation facilities for women and men working on the site. Locker rooms and/or latrines should be in separate areas, private, and well-lit as well as include the ability to be locked from the inside.
- Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited
- As appropriate, public spaces around the project grounds should be well-lit
- Promote the hiring of local labor (men and women)
- Mitigate against SEA/SH by all project workers towards local populations (the host community, especially among project workers, and a prohibition of any sexual relations with any minors under the age of 18 years and between project personnel and community members because the power dynamic between these two groups is usually imbalanced.
-) via Codes of Conduct with clear and unambiguous language on prohibited behaviors and sanctions for breaching them. These Codes of Conduct should be accompanied by ongoing sensitization and training of project workers by the GBV Consultant.

- Comply with the Grievance Mechanism procedures, including the procedures for reporting and handling SEA/SH cases ethically and confidentially
- Respect a perimeter of protection around the following sensitive areas:
 - Shorelines and rivers
 - Recognized wildlife habitats
 - Water supply basins
 - Steep and erodible slopes
 - wetlands
 - inhabited areas
- Minimize the duration of work in environmental and social sensitive areas like school sites which are near houses and football fields and respect normal working hours
- Control access to work sites and use adequate road signs
- Promote the recovery of wood in deforested areas and the reuse of dismantled materials and equipment
- Limit expropriation of rights-of-way and promote sharing of uses
- During construction, compensate women, men and communities for unavoidable or accidental losses by promoting a participatory approach and ensuring that payments are made before losses occur and that safeguards (Codes of Conduct, trained workers, functioning GM and community awareness around the GM and prohibited behavior) are in place to mitigate against gender discrimination or SEA/SH risks during the compensation process
- At the end of the work, restore the affected environment components to their original state
- Conduct community and worker awareness of the project level Grievance Mechanism (GM), including transparent, accountable and responsive grievance measure processes for laborers as well as procedures for the ethical and confidential management of SEA/SH-related cases, and keep detailed and accurate records of communication between the contractor, its supervisors and community and notify the PIU of any grievances or community issues that require the attention of the project team and thus, activation of the GM

3.2 Summary of the situation for the new sites which results from the environmental and social screening forms

A field visit was conducted for the screening of the sites which will host educational infrastructures on the GESSP. The aim of these visits was to carry out a screening process with a view to assess both environmental and social impacts and risks on the proposed sites. The screening will assess the possible repercussions, the direct and indirect, temporary and permanent effects of the project on the environment and, in particular, on the biophysical and human environments to identify the measures to improve the positive impacts of the project, remove, mitigate and / or compensate the negative effects and impacts, and other risks, as well as to determine the means necessary for their implementation.

3.3 Screening was conducted together with the official of the National Environment Agency (NEA) in Central River Region.

The results of this screening have not highlighted any major risks or potential impacts, as risks and conditions are relatively similar in all sites. As a result, a single C-ESMP will be developed because the mitigation measures will be the same in all the sites, and where necessary, will be adapted to address the specific risks as they arise.

Like the consultation conducted during verification of the land donation process, the screening of the new sites hosting the proposed schools did not highlight any major environmental and social challenge further justifying the development a single C-ESMP so far. All the sites are topographically flat and are mostly agricultural lands with no waterways or wetlands, except one site located at Yorro Beri Kunda (YBK) which has a waterway closed to the selected site. A slab will be built to allow water to run normally and avoid any obstacle which can provoke flood

The possible environmental impact of the Yoro Beri Kunda waterway was factored in the design stage where proper orientation of the proposed buildings was strategically located within the site and a culvert for the storm water is designed for proper channeling away from the site to be provided through the works contract.

In conclusion, the Project needs to develop only one C-ESMP which will cover all the works as they will all take place in the same type of environment and social context with the same interventions.

3.4 A summary of the situation of existing sites (with the planned activities)

The existing sites are already built with various school infrastructures. The GESSP will only add on facilities like perimeter fencing, classrooms, kitchen, and toilet blocks plus water system. These would be minor works requiring 10 workers per site at the most. The total existing sites number 105 and mostly in the Central River Region.

Activities planned in the existing site:

- New Multi-grade Block (x3 classrooms)
- New Kitchen Block
- New Toilet Block (x2 WC)
- New Boundary Fence
- Rehab water system.

Screening was not done on those sites because schools have been already built there, MOBSE will just improve the infrastructure in order to host more students and improve conditions of learners and teachers. It should be noted that all the activities that will be carried out on both new and existing sites will be subject to a risk analysis which will be integrated into this document and will take into account all safety and environmental concerns.

4.PURPOSE OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN OF THE CONSTRUCTION SITE (ESMPCS)

4.1 Preparation of the C-ESMP

The *Environmental and Social Management Plan of the Construction Site (C-ESMP)* is prepared by FIOHTG for all its site activities in quality of Contractor in compliance with World Bank requirements and The Gambia standards of building educational facilities.

All the lands were voluntarily donated and were agriculture lands. Millet, sorghum, groundnuts, or maize were cultivated during the rainy season, except in Yoro Beri Kunda where the land is a football field. In this site, the community has identified alternative land and given land to the youth to play football.

As such, the screening activity has not highlighted any major risks or impacts, given the relative similar community and biophysical baseline in all sites and a single ESMP will be developed because the mitigation measures will be the same or similar in all the sites. Where there are differentiated risks and impacts, these impacts and risks will be noted and appropriately managed and/or mitigated.

As per its nature, the C-ESMP does not contain any information about the project, of the proposed activities and works, site information and associated facilities. All this information can be found in documents, such as the *Environmental and Social Management Framework (ESMF)*.

4.2 Responsibilities of FIOHTG as Contractor

FIOHTG commits to deploy and implement this environmental and social management plan for the construction of the educational facilities in line with the World Bank requirements and Operational Policies. This plan will aim to:

- Respect the regulatory framework applicable to the project
- Mitigate the negative impacts of the project on the environment and to the project affected community, especially impacts and risks to vulnerable individuals or groups, including SEA/SH-related risks
- Adhere to mitigation measures as well as consultation/public engagement and OHS guidelines as noted in Chapter 1 as they relate to COVID-19
- Monitor the activities that will be allocated to FIOHTG, measure and monitor any impacts
- Ensure the safety and security of people and materials
- Prevent risks, accidents, and dangerous situations
- Provide corrective, preventive and any necessary changes as needed
- Conduct required training and awareness-raising sessions as outlined in the ESMP and enforce Codes of Conduct of its workers, especially as they relate to mitigating SEA/SH risks
- Consult and inform communities of project developments as per the ESMP in an inclusive and accessible manner, considering as appropriate, guidelines for consultation as noted in Chapter 1 related to COVID-19
- Provide a grievance mechanism for project workers that is fair, accessible, inclusive, and transparent, complies with national labor laws **as outlined in Annex A**, and includes procedures for the ethical and confidential treatment of SEA/SH-related cases

The Contractor shall respect and apply the laws and regulations of the Gambia in environmental and social matters and become familiar and comply with its regulations, devices, and guidelines. In the

day-to-day organization of its work, the Contractor will take all appropriate measures to minimize environmental damage and adverse social impacts to communities, including in relation to SEA/SH risk, by applying the requirements of the contract and ensure that its staff, their dependents and its local employees, respect and apply them as well.

Prior to the start of the work, the Contractor will bring together all persons likely to work on the construction sites and give them all the relevant information concerning the environmental and social measures applicable to the project and will ensure that they apply them.

PCU will be notified by the ESSH manager of events that occur over the course of the day.

4.3 Responsibilities of PCU

As GESSP's Project Engineer and Project Manager, the PCU will be responsible for environmental and social monitoring and supervision during the various stages of the site, pre-construction, construction activities and equipment operation.

Its on-site representatives (the environmental and social safeguards officers) will also be responsible to monitor the application of all environmental and social measures, requirements and other guidelines specified in the contractual texts of the Project.

During the construction phase, designated environmental and social site supervisors will ensure compliance with measures for the protection of the biophysical environment and community. They shall ensure, among other things, the protection of identified sensitive areas.

PCU and FIOHTG must develop, before the start of civil work, a joint communication plan to respond effectively to any emergency. They must also ensure that local authorities are involved in carrying out the project as planned.

Upon completion of the work, the PCU representative must also ensure the execution of the repair work on the premises specified in the impact study or requested by the consulted parties. The supervisor will carry out the environmental and social acceptance of the works and fills the inspection sheets for this purpose. An environmental and social reception will be done before the technical acceptance in order to see if FIOHTG and its subcontractors have respected and followed the environmental and social requirements set at the beginning of the Project.

4.4 Documentation, monitoring

At each phase of the project, any monitoring activities and corrective actions or mitigation measures should be documented accurately for the record.

- **Construction phase**

Weekly site monitoring reports should include a specific section on monitoring of mitigation measures, including training/awareness building activities. Monitoring of the contractor's SEA/SH Prevention and Response Action Plan and the effectiveness of the relevant prevention, mitigation, and response measures should be included in these weekly reports. This also includes COVID-19 protocols as per Chapter 1 above. Any observations of compliance or non-compliance must be recorded using the terms of the monitoring indicators. These daily reports must also document any corrective action.

- **Operational and maintenance**

During the operational and maintenance phase, the PCU safeguards team will ensure that the environmental and social measures and recommendations are duly implemented. At the end of each year, the safeguards team will prepare an annual report stating how the schools and surrounding communities are managing these infrastructures in view of the environmental and social measures that are in place.

4.5 The Health and Safety Plan (HSP)

To simplify work and avoid redundancy, this ESMPCS contains sections that cover all aspects of the **Health and safety plan (HSP)**. This Plan includes the following aspects, in particular: safety and health risks related to the conduct of the work, including those related to SEA/SH; prevention and protection measures against the risks foreseen for the conduct of the work; the human and material resources involved; and contingency plans to be implemented in the event of an accident. The HSP also includes measures noted in Chapter 1 on COVID-19.

4.6 Execution and update of the C-ESMP

The ESMPCS is prepared based on the ESMF guidelines and the information available during consultation and screening of the sites which will host the schools, is intended for PCU GESSP's delegated project manager, who must review and approve it before submission to the World Bank.

4.7 Purpose of the ESMPCS

The Environmental and Social Management Plan of the Construction Site (ESMPCS) pursues the following objectives:

In this project, the environmental and social objective is for the project to be realized by recording «0 serious environmental/social accidents» and the Project must fulfill the requirements defined in the MOBSE Environmental and Social Management Framework (ESMF).

- Ensure compliance with local health, safety, social and environmental regulations, as well as applicable international regulations
- Ensure a rigorous consideration of health, safety, social and environmental issues, including those related to SEA/SH risks, during construction and installation activities and at all stages of the decision-making process
- Ensure that all stakeholders share the same vision of the Project's health, safety, social and environmental requirements and that each person working on the Site is aware of these requirements, including those related to codes of conduct for all workers in the project, which should also cover provisions related to SEA/SH risk mitigation³
- Ensure the Grievance Mechanism, which should also be adapted to handle SEA/SH-related complaints ethically and confidentially, is utilized and understood by project workers, and all communications with community members are recorded accurately
- Take the necessary measures to ensure that all equipment and materials are used, handled, stored, and transported safely
- Maintain healthy sites and other workspaces
- Provide all employees with a safe working environment, with adequate health, safety, and environmental conditions, including measures to prevent and respond to sexual harassment in the workplace
- Provide information, training and ensure implementation of a proper framework. It is also part of the policy of FIOHTG to ensure that none of its activities exposes any individuals to danger, regardless of their status as an employee or member of project-affected communities
- FIOHTG will pay attention to the interactions of its work with the local environment. Respect for both the existing and local customs (community norms) is a real challenge and contributes to the acceptance of the project by the community

³ This includes: Ensure requirements in CoCs are clearly understood by those signing; Have CoCs signed by all those with a physical presence at the project site; Train project-related staff on the behavior obligations under the CoCs; Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

5.1 Responsibilities

The Contractor is required to identify all regulatory texts related to aspects of environmental protection (water, air, soil, noise, vegetation, fauna, flora, waste, groundwater) and the protection and management of social risks for project-affected communities (those regarding labor law, occupational exposure standards, gender-based violence and violence against children, sexual exploitation and abuse, sexual harassment, and other regulatory texts in consideration of other vulnerable groups and individuals such as the elderly and persons with disabilities living in the Project-affected area).

5.2 Sub-contracting

The Contractor is fully liable for the acts, failures and negligence of the Subcontractors, their representatives, employees or workers as fully as if it were his own acts, failures or negligence or those of his or her own representatives, employees or workers.

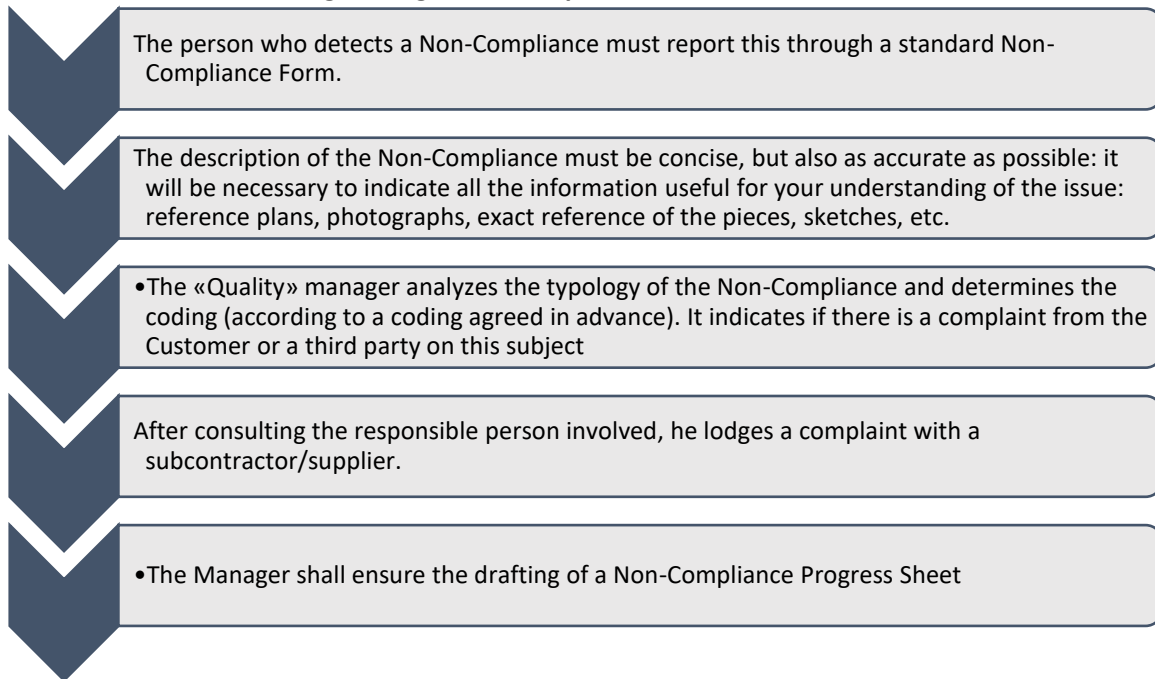
The Contractor is required to identify all regulatory texts related to aspects of environmental protection (water, air, soil, noise, vegetation, wildlife, flora, waste, groundwater) and the protection of people (labor laws, occupational exposure standards, protection against GBV, SEA, SH, VAC, as well as harm to other vulnerable groups and individuals, such as persons with disabilities and the elderly, among others).

5.3 Non-compliance management

Any non-compliance detected during inspections carried out by the PCU will be treated according to the seriousness of the situation. Incidents of non-compliance will be divided into four categories:

- (i) *Notification of the Observation*: for minor incidents of non-compliance. This level entails only verbal notification from the PCU to the Contractor's on-site representative, with signature of Observation Notification prepared by the Project Manager; the multiplication of Observation Notifications on a Site, or the failure to consider the Observation Notification by the Contractor, may raise the Observation Notification to a non-compliance of level 1.
- (ii) *Non-compliance of Level 1*: for incidents of non-compliance that do not pose a serious and immediate risk to the environment and the health; the incident is reported to the Contractor and must be resolved within five days. The Contractor will send to the PCU the Problem-Solving Report. After visiting and issuance of a favorable opinion, the PCU signs the closing report of non-compliance. In any case, any Level 1 non-compliance that was not solved within one month will be a Level 2.
- (iii) *Non-compliance of Level 2*: applicable to any incident of non-compliance which has caused damage or poses a high risk to the environment or health. The same procedure as for an incident of non-compliance at Level 1 is applied, and the solution shall be issued within three days; any Level 2 incident of non-compliance that was not solved within one month will be a level. 3.
- (iv) *Non-compliance of Level 3*: applicable to any incident of non-compliance that poses a major risk of or causes environmental and social harm to humans. Level 3 is the highest hierarchical level for incidents of non-compliance. The Contractor and the PCU are informed immediately, and the Contractor has twenty-four hours to resolve the situation. Level 3 non-compliance results in the suspension of the next settlement payment until its resolution has taken place. If the situation so requires, the PCU may order the suspension of the work pending resolution of non-compliance.

Chart 1: Procedures for registering a non-compliance



5.4 Human Resources

The main positions foreseen or to be provided by the Contractor for the ESHS are as follows:

THE PROJECT MANAGER ASSISTED BY ESHS OFFICER The Contractor shall appoint an Officer of Environment, Social Security and Health responsible for the implementation of these ESHS specifications;

- The Project Manager supervises the ESHS Officer who is responsible for the execution of all ESHS regulations, ensures the evaluation and follow-up of the ESH plan and proposes improvement plans according to the comments;
- The ESHS Officer must ensure that all relations with stakeholders external to the Construction Site: local communities, administrative authorities, other economic actors located around the Site, as well as links with consultants;
- The ESHS Officer has the necessary seniority/authority level in the organization of the Contractor to stop work if necessary, in case of non-compliance level 2 or 3, and to mobilize the gear, personnel and equipment of the Site to implement any correction measure deemed necessary;
- The ESHS Officers shall be, at least, an undergraduate in a discipline adapted to their assignment or the execution of the work, or a significant experience of at least five years in the definition and monitoring of the implementation of the management plan for environmental and social impacts of construction sites.
- The Project Manager will be responsible of everything happening in site, the implementation of the environmental and social safeguards requirements and their monitoring will be under his responsibility.

5.5 Inspections

The ESHS Officer jointly with PCU environmental and social safeguards team shall perform an ESHS inspection of the sites, at least one a month.

Each monthly inspection must be translated into a written report in a form approved by the PCU, including all situations of non-compliance with these Environmental, Social, Safety or Health Specifications observed on the Site(s).

Incidents of non-compliance are visually illustrated by digital photography captioned so that the location, date of inspection and non-compliance shown are explicit.

The ESHS activity report is complete and edited according to an indelible, fully paginated process, established in a homogeneous way, allowing a quick and secure identification of their object.

The ESHS Activity Report is submitted no later than six business days after the end of the month concerned.

Among other things, the Activity Report contains information on the following aspects: accident recorded, dangerous situations, sensitization carried out with staff and communities; and state of the staff, their daily condition, medical check-ups and cases of diseases recorded, cases of SEA/SH and sensitization to workers and communities regarding those issues and how to handle confidential and ethical reporting of these cases, as well as a referral pathway to appropriate support services for SEA/SH survivors and appropriate sanctions for breaching codes of conduct; inspections performed; non-conformities detected in the month and description of the corrective measures put in place; status of product registers and hazardous waste; anti-erosion and sediment control activities initiated during the month; actions undertaken with external actors: local populations, local authorities, government agencies; and results of monitoring of all agreed indicators.

5.6 Notification of accidents

The PCU is informed, within one hour after the event, of any serious bodily injury to a member of staff, a visitor of the Construction Site or any other third party, caused by the conduct of the work or the behavior of the staff of the Contractor.

The PCU is informed, within six (6) hours following the event, of any accident related to the conduct of the work which, under slightly different conditions, could have caused bodily injury to persons, damage to private property or the environment, including potential cases of SEA/SH that have been reported (with reporting following procedures of informed consent by the survivor, confidential documentation to avoid identifying the parties involved, and principles of survivor oriented care as referenced in the GM), only information like: when the incident occurred is needed, but also if it involves project staff, if the survivor was referred to services is needed in the description of the case.

The PCU must inform the World Bank within 24 hours be accident happens with a short and clear detail of the facts and the severity of the accident. For cases involving SEA/SH, the reporting to the World Bank shall be within 24 hours, is contingent upon informed consent from the survivor, and must follow principles of survivor-oriented response and care to avoid breaching confidentiality and identifying the parties involved.

5.7 Rules of procedure

The Contractor establishes a set of rules of procedure for Sites mentioning safety rules, prohibitions of substance abuse, the sensitive elements of the environment surrounding the Sites, the dangers of sexually transmitted diseases (STD), sexually transmitted infections (STI), including HIV/AIDS, gender-based violence (in particular, SEA and SH), violence against children, the use of child labor, and general respect for the habits and customs of project-affected communities and human relations.

The regulations shall be posted on the various Sites and in the vehicles and equipment of the Contractor. It confirms the commitment of the Contractor to the implementation of the ESHS provisions stipulated in the Agreement.

A presentation of these rules of procedure and associated policies is made to new employees, as well as to existing staff, who shall sign code of conduct before the start of the work.

The regulation will cite a list of serious faults, after the offender's recidivism and despite the knowledge of the internal regulations, to immediate dismissal by the Contractor, and this without prejudice to any legal proceedings instituted by authorities for non-compliance with the regulations in force:

- Drinking and drug use during working hours, resulting in risks to the safety of residents, customers, users, and staff
- Discriminatory, harassing, or abusive wording and attitudes, sexual exploitation and abuse, sexual harassment, or other forms of gender-based violence
- Violent and aggressive behavior
- Deliberate damage to property and interests of others or the environment
- Repeated negligence or recklessness resulting in damage or harm to the environment, to the population, to property, particularly in relation to the prescriptions against the spread of STDs and HIV/AIDS and other communicable diseases (including COVID-19) as well as against violence of abuse in any form
- Sexual relations with minors (defined as persons under 18 years of age).

Criminal activities such as pimping, pedophilia, physical and/or sexual assault, drug trafficking, serious voluntary pollution, trade and/or trafficking of all or part of protected species, will result in an immediate dismissal from the first finding of misconduct, in application of the rules of procedure and the labor legislation in force and may be subject to criminal prosecution.

The employer will draft a record for each serious misconduct, a copy of which will be given to the person concerned, indicating the measures taken to end the wrongdoing by the person concerned. This form will be sent to the PCU as an attachment to the monthly reports, which will also provide information to the World Bank. Any reports about SEA/SH-related incidents must be reported in adherence to the procedures established for the safe, ethical, and confidential reporting of these incidents.

5.8 ESHS Training

The Contractor shall prepare a training program for its workforce and the communities affected by the Project works that shall be described and documented in the monthly ESHS activity report.

The trainings are structured in two groups: the initial trainings received during the first intervention on a Site, and the technical trainings required for conduct at work.

Initial training to be given to each employee and community should cover at least the following topics:

- Rules of procedure
- Safety Rules on the Construction Site, including those relating to COVID-19
- Protection of areas adjacent to the Sites (fauna, flora and water) and risks linked to sexually transmitted diseases, sexual harassment, sexual exploitation and abuse, other forms of gender-based violence, and violence against children, and reporting measures related to these environmental and social risks
- Basic health: malaria control (if present), waterborne diseases,
- Reactions to alerts and evacuation procedures. Review of the project-level GM, including procedures specific to the ethical and confidential management of SEA/SH-related cases.

- Codes of conducts awareness and their signing

5.9 Standards

The Contractor complies with the regulations, standards, thresholds, and concentrations of discharges fixed by the National Environmental Agency of The Gambia.

The Contractor also complies with the standards, guide values, regulations, thresholds, and concentrations of rejections recommended in ESHS by the international specialized agencies like World Health Organization (WHO), International Labor Organization (ILO).

6. PROTECTION OF THE ENVIRONMENT

6.1 Protection of adjacent areas

The Contractor shall, during the entire duration of the work-regardless of the phase (preparation of the construction site or construction) implement the protective measures and construction methods necessary to avoid affecting vegetation, soils, groundwater, biological diversity of animal and plant species, natural drainage and water quality of areas adjacent to the Sites.

Except for access roads or unless instructed otherwise by the PCU, the boundaries of land sites of less than 2 hectares are materialized by a fence, a ribbon, or a fence over the entire perimeter of the facilities. For sites larger than 2 hectares, the boundaries are physically marked on the ground by a belt access, signs or any other signal leaving no possible interpretation on the location of the boundaries of the Site.

6.2 Selection of screen, excavation, and site access areas

The Contractor submits, with the prior agreement of the PCU and relevant authorities, the choice of land he needs such as (i) borrow or excavation areas of any material required for construction or (ii) surplus dumpsites, or deposit of rubble resulting from demolition work.

6.3 Effluents

The effluents consist of all liquid discharges, infiltrations included, coming from the Sites carrying a polluting load (dissolved, colloidal, or particulate).

No effluent is discharged by the Contractor into watercourses, soils, bodies of water without prior treatment and without measures to monitor the effectiveness of this treatment, and to guarantee the absence of polluting load.

6.4 Water management

Regarding water resources management during construction, the Contractor must apply or consider the following measures and considerations:

- Avoid at all costs conflicts with the water needs of local communities
- Consult with the local community regarding surface water and groundwater withdrawal.
- Avoid removal of water from wetlands (if permission should be obtained from the competent authorities)
- Perform any temporary containment of water sources so as not to disrupt water supplies downstream communities, and to maintain the ecological balance of the river system
- Do not discharge into watercourses any construction water or effluents containing contaminated materials, including cement and oil
- Do not discharge into waterways or road drainage ditches any water from equipment cleaning

Construction Site waste and temporary storage sites must be located away from the drainage system and surface runoff must be directed away from these sites to prevent erosion.

Any stagnant water in construction areas or borrow pits will be eliminated to avoid creating breeding grounds for mosquito vectors of malaria.

6.5 Emissions into the air and dust

The Contractor uses equipment and adopts construction and transportation methods that do not emit pollutant loads into the atmosphere more than the thresholds recommended by the national standards or the recognized international agencies.

The emissions consist of any discharge into the air of solid substances, aerosols, or gaseous, of radiations, of energies, whether the sources are punctual (for example, a stack of an incineration unit) or diffuse (for example raised dusts by trucks).

- Air pollution is mainly caused by:
 - Transportation and vehicular traffic
 - Deforestation (burning of wood waste)
 - Clearing works for opening access and earth works
 - Dust raised by the passage of vehicle and machinery
- Fumes and gases emitted by vehicles, heavy machinery, and certain work equipment (e.g., generators) (including fumes generated by burning wood waste)

The Contractor shall document and keep at the disposal of the PCU the maintenance books for his fleet of vehicles, machinery, and equipment.

On unpaved roads used by vehicles and machines, the Contractor shall implement measures to reduce the dust raised when passing his vehicles or machinery through inhabited areas and on the internal traffic lanes of the Sites.

- These abatement measures include regularly spread water or other non-hazardous dust agglomeration product on the pavement and the reduction of velocities in and near the target areas.

For storage, transport, and handling of bulk materials in the open air and exposed to the wind, the Contractor implements dust abatement measures, including one or more of the following techniques:

- humidification of the surface
- surface cover
- weeding the surface

6.6 Noise and vibrations

The Contractor uses equipment and adopts construction and transportation methods that do not emit into the atmosphere noise levels exceeding the thresholds recommended by the national and international agencies.

6.7 Waste Management Register

Management of waste will be recorded using the table in Annex H.

Day of the Week	Organic waste	Plastic waste	Metals	Glasses	Chemicals	Other
Monday						
Tuesday						
Wednesday						
Thursday						
Friday						
Saturday						
Sunday						
Means of Waste Processing						

The Contractor is responsible for the identification, collection, transportation and treatment under the health and environmental international standard conditions of all waste produced on the Sites by its workforce, sub-contractors, contractors and visitors to the Construction Site or facilities.

The Contractor shall maintain and keep at the disposal of the PCU a record of the follow-up of all its waste. This monitoring register traces all the operations related to Waste Management.

The waste is categorized and stored separately before removal from the Sites, according to their dangerousness, their state, the treatment process, and according to their potential for recycling or reuse.

The Contractor shall maintain and maintain at the disposal of the PCU the collection, receipt, treatment and/or waste disposal slips. The waste tracking register is available as soon as the Contractor is mobilized on site. It is kept for at least one year after the provisional acceptance of the works:

- Distances of more than 100m from any natural sensitive area and more than 500m from any sensitive human area (school, market, health center, water well or catchment), apart from bins in remote sites
- Protected from movement of gear and vehicles, but easily accessible for regular removal
- Flat terrain, impervious to infiltration
- Covered shelter when the waste is not inert
- Equipped with containers adapted in capacity, tightness and resistance to the dangerousness and the state (solid, liquid, gaseous) of the waste

The removal of waste from the Sites to recycling, treatment or deposit sites shall be regularly done. The frequency of removal proposed by the Contractor and approved by the PCU must guarantee:

- No overflow of containers
- Absence of odor nuisance or dangerous emissions for human health
- No proliferation of insects, rodents, dogs, and other animals that are harmful or dangerous to human health
- Regular cleaning of container sand plat forms on which containers are placed

Except as otherwise provided in agreement, or unless instructed otherwise by the PCU, the incineration of waste on the Site (s) is prohibited, except for medical waste, of which a medical facility will be contacted

and protocol signed for proper management by incineration thanks to new incineration facilities implemented under another World Bank Projects and forest waste in accordance with the national regulations.

The management of the waste by an external contractor must be preceded by a documented inspection of its processing, recycling, or depositing facilities by the Contractor, ensuring the application of the waste management.

6.8 Vegetation clearing

A specific agreement with the PCU is required prior to any clearing work:

- Clearing by chemical methods is forbidden.
- Training of staff on the use of fire extinguishers, First Aid, and the provision of emergency contact numbers in case of an accident or an emergency.
- Bulldozer clearance is not accepted within 30m of areas notified as sensitive, only manual clearing will be allowed in these areas.

Clearing by fire is not allowed, except for the burning of forest waste in the premises, and according to a previously approved method and schedule.

Installation of fire extinguishers

- The main activities likely to have impacts on vegetation are as follows:
 - The presence of staff
 - Deforestation
 - Construction of access roads
 - Excavation and earth work
- The expected impacts during the works are:
 - Loss of productive vegetation (natural forests and plantations)
 - Damage to surrounding vegetation
 - Greater harvesting of forest products by the workers
 - The possibility of invasion of exotic plants on the way and around the installation;
 - Increasing the risk of forest fire
 - The risk of disrupting protected species and/or cultural heritage sites and plant species which can be used as medicines, food, or worship

Protection of vegetation

Several measures shall be taken to protect vegetation:

- Clearly define cutting areas to restrict deforestation
- Remove the equipment from the vegetation
- Protect the roots of nearby trees by banning the movement of machinery and marking a safety perimeter
- Maintain useful trees that have been spared during agricultural clearing
- Restore vegetation after the completion of the work

- Recover forest products from deforestation and implement mechanisms to distribute them to the local population
- Weed a buffer zone around the work area and worker camps to prevent the spread of bush fires and keep fire-fighting equipment (pumps, etc.) at disposal as part of emergency measures.
- Very few trees will be impacted, during the survey and design of the facilities, all the trees were avoided
- Develop a reforestation plan with the assistance of the Department of Forestry and engage schools and students to protect trees knowing the importance they have in our daily life

Clearing operations shall be done without damage to adjacent non-cleared areas: the topsoil is stored in the cleared perimeter and at the edge of clearing zone, the trees are cut inside the Site.

6.9 Erosion and Sedimentation

At all sites, the Contractor plans the earth works and optimizes the management of the space, so that the areas cleared and exposed to soil erosion are minimized.

Topsoil:

- The topsoil consists of the first 25cm of soil
- Earthworks for the temporary occupancy of a Site are preceded by the stripping of the topsoil and their separate deposition of the underlying barren soil
- The storage of topsoil is done according to the provisions approved by the PCU allowing their reuse for the repair of the Site

Drainage of runoff:

- The slope of the sites allows drainage and collection of rainwater on all its surface without stagnation points, to one or more discharge points
- Rainwater thus collected is pretreated by decantation to reduce the suspended solids content, supplemented by a de-oiling device if the Site is used for parking, storage, installation or maintenance of vehicles, machinery, or equipment with a heat engine
- Rainwater pretreatment is sized, cured and accessible to achieve quality objectives

Debris and deposits of materials:

- For permanent debris deposits, the excavation will be further shaped and compacted regularly every 30cm to ensure its long-term stability.
- Deposits of temporary materials whose length of stay before use exceeds 60 days will be subject to protection by (i) revegetation using fast-growing herbaceous species, either by direct seeding or by hydraulic seeding, in order to protect the deposit against erosion

6.10 Repair

Unless otherwise instructed by the NEA or PCU, the Contractor shall restore all Sites that have been disturbed by the works, prior to the provisional acceptance of the works, including access.

After removal of any built, fabricated, or buried structures (e.g., pipe or septic tank) and disposal of rubbish or rubble, the Contractor shall recondition the Sites in accordance with the following provisions:

- The land is leveled so that drainage of runoff occurs without soil erosion or water stagnation.
- Rehabilitated sites should no longer be a source of danger or risk to people.

- Unless otherwise provided in agreement or instructed otherwise by the PCU, vegetation of all Sites disturbed by the work is the responsibility of the Contractor.
- The topsoil stored during initial earthworks should be spread evenly over open areas after leveling or deep trenching in compacted areas.
- The Contractor shall describe the methods, species and origin of the plants or seeds, schedule of activities based on the progressive provisional acceptance of the Sites, which he plans to implement for the sustainable revegetation of the Sites.

6.11 Documentation of the status of the Sites

The situation of the Sites is thus documented at least in the following steps:

- Before disruption of the Sites at the start of the works;
- After the work of the Site but prior to the start of the repair activities;
- After the repair and, if applicable, revegetation activities before the provisional acceptance of the works;
- After the repair and, if applicable, revegetation activities before the provisional acceptance of the works.

7. HEALTH AND SAFETY

7.1 Health and safety plan

The Contractor describes its Health and Safety Plan, taking into account the World Bank's Environment and Social standards and MOBSE construction standards. Also, a risk analysis has been developed (**Annex P**) to show how the Contractor will handle the different risks which can occur during the works.

In particular, the HSP identifies and characterizes:

- a) All safety and health risks related to work conduct including SEA/SH
- b) Preventive and protective measures against risks foreseen for the work conduct
- c) Human and material resources implied
- d) Emergency plans to be implemented in the event of an accident

The Contractor implements the prevention, protection and monitoring measures described in the health and safety plan.

7.2 Weekly and daily meetings

The Contractor organizes, at least once a week or at another frequency approved by the PCU, a Safety and Health meeting per Site where an activity is carried out, with all employees assigned to this Site. Accidents and incidents in the past week are described and feedback is valued (the reporting of any SEA/SH-related incidents must follow principles for the ethical and confidential management of these cases, including informed consent by the survivor). Improvement actions shall be identified, documented, and evaluated until resolved. The Project Manager is invited to attend each of the Safety and Health meetings. He is the recipient of their report.

The Contractor organizes on a daily basis or at another frequency approved by the PCU per shift and team, before the start of activities, a Security and Health point on all Sites where an activity takes place. The meeting establishes the Safety and Health risks associated with the tasks and activities of the day and the measures of prevention and protection. It shall also confirm at such meetings that new employees assigned to the site have signed the code of conducts prior to commencing work for that day.

7.3 Equipment and operation standards

The facilities and equipment used by the Contractor are installed, maintained, overhauled, inspected, and tested in accordance with the manufacturer or his recommendations.

7.4 Equipment, collective and personal protection

The Contractor has the obligation to ensure that any personnel, visitor or other entering a Site, is equipped with personal protective equipment in accordance with the standards practices.

The staff of the Contractor is trained in the use and maintenance of Personal Protective Equipment (PPE).

At a minimum, the Site staff and visitors shall wear safety helmets, safety shoes and reflective vest. Personal protective equipment is available on the Sites, in enough quantities and under appropriate storage conditions for their use.

Provide physical barriers and enclosures at the work sites to prevent intruders and protect the local communities (especially vulnerable groups, such as persons with disabilities and children) and animals from unnecessary injury.

Also provide scaffolding or nets for the protection of those working at heights.

7.5 Hazardous materials

A material is dangerous if it has one or more properties that make it dangerous as defined in Chart below. The Contractor identifies and manages the hazardous materials that it plans to use on the Site(s). Labels will be placed on certain equipment or hazardous products.

Any supply or use of hazardous material is subject to the prior authorization of the Project Manager.

- Mutagenic: Substances and preparations which, by inhalation, ingestion or skin penetration may produce heritable genetic defects or increase their frequency.
- Sensitizing: Substances and preparations which, by inhalation or skin penetration, may give rise to hypersensitization reaction such as a new exposure to the substance or its preparation.
- Reacts to Water: Substances and preparations which, in contact with water, air or acid, give off a toxin or very toxic gas.
- Produces Characteristic Adverse Effects: This property is to be considered only if the test methods are available.
- Dangerous to the Environment: Substances and preparations which may, after being disposed of, give rise, by whatever means, to another substance, for example leachate, which has any of the above listed characteristics.

Storage of hazardous products:

- The storage areas are designed and constructed by the Contractor taking into account not only the physical and chemical properties of the products, but also the types of containers that will be stored there, the number of people having access to them, and the quantity of consumed products.
- Contractor shall anticipate the need for the storage of hazardous waste for disposal.
- The use of storage places for hazardous products is subject to strict rules, the application of which is regularly monitored by the ESHS Officer. These rules include at least:
 - (i) Limit storage access to only trained and authorized people;
 - (ii) Keep an updated stock status;

- (iii) Subordinate the storage of a chemical to the existence of its regulatory safety data sheet and labeling
- (iv) Establish a rigorous and well-known classification (display of a plan, prohibition of storage of bulky or heavy packages at height, no storage of tools and equipment in the chemical storage room);
- (v) Respect the expiration dates of the products and setup a procedure for eliminating unnecessary or obsolete products prohibit the congestion of access roads, exits and emergency equipment.

Storage areas must be clearly marked with warning signs at the entrance. The Contractor also affixes a display of the storage plan (location of the various products, maximum capacity), a summary of the labeling of the products in storage and the reminder of any incompatibilities.

- Chemicals that can react with each other (causing explosions, fires, spatter or dangerous gas emissions) must be physically separated.
- Products that react violently with water should be stored in such a way that no contact with water is possible, even in case of flooding.
- Flammable products must be stored separately in a dedicated and constantly ventilated enclosure.

The Contractor shall implement measures to maintain the temperature of the storage place of hazardous products at a level avoiding breakage of packaging or avoiding over pressured containers.

7.6 Planning for emergency situations

The required emergency plan covers at least the following emergency situations:

- a) Fire or explosion
- b) Structural failure
- c) Loss of containment of hazardous material
- d) Safety (accident or committed by malice), including incidents of sexual violence
- e) COVID-19 related

The Contractor shall ensure that all personnel are informed and trained to respond in such situations, and that responsibilities are defined. Information and training are documented in writing, available on all Sites.

The Contractor shall organize and document emergency plan implementation exercises in the first three months after the start of work and once every 12 months until the provisional acceptance of the work. The Project Manager is invited to participate in each of these exercises.

7.7 Ability to work

The Contractor shall send each of his employees to a medical examination prior to his mobilization on the Site to verify their ability to perform work activities. This medical examination is carried out in accordance with the recommendations of the International Labor Organization. It is sanctioned by a written medical certificate of ability to work provided for the worker.

The staff exposed to noise levels greater than 80dB (A) shall perform prior hearing tests to establish initial audiograms. Annual tests are performed to monitor the evolution and detect a possible degradation.

The PCU has the right to request additional medical examinations on the Contractor's staff, at the expense of the Contractor, if he considers it necessary.

Any return to work of an employee after an absence related to a work accident is subject to a prior medical examination giving rise to a written medical certificate of fitness to return to work at the designated position.

The Contractor shall submit a copy of the work certificates of his staff upon request by the PCU or the competent authority.

7.8 First Aid

The Contractor shall always prepare a First Aid plan and ensure the presence during working hours of at least one rescuer per shift where 10 to 50 workers are assigned, and an additional first aider for each additional 100 workers assigned to this shift.

The Contractor provides the Construction Site with a communication system available immediately and solely for the purpose of communicating with First Aid. How to contact first aid services should be clearly indicated near the facilities of this system.

7.9 First Aid Kits

The Contractor provides each Site with an adequate number of first aid kits so that the time required for access is approximately 5 minutes for all workers. The kits must always be available.

- Each vehicle is equipped with a first aid kit
- First aid kits and equipment must comply with the specifications attached thereto

7.10 Health Care Access

The Contractor guarantees all his staff for any accident/incident or illness occurring during the conduct of the work, the health care access provided by the medical staff and the care center(s) nearest to the worksite to know:

Before the works start, FIOHTG will make sure there is First Aid Kit for minor treatment. FIOHTG will work closely with the nearest health centers in order to have a protocol for the treatment of workers and staff under the Project by those health centers, including for SEA/SH-related cases.

- (i) Medical examinations: initial (pre-employment), annual and return to work after medical leave. This includes testing for COVID-19.
- (ii) Screening, immunization, and preventive health
- (iii) General care for the duration of the work
- (iv) Medical stabilization in case of accident and assistance during emergency evacuation

The staff of the Subcontractors, other contractors, the Customer, or the Project Manager present on the Site must never be denied medical care under the pretext of not being employed directly by the Contractor.

7.11 Medical monitoring

The Contractor cannot hire workers in poor health.

The initial pre-employment examination must certify that the candidate is not carrying an infectious disease and is physically fit for the position for which he or she is applying.

The Contractor shall organize annual medical check-ups for its employees and maintains a medical file per employee. The presence of the employees for the medical visits, the treatments and the hospitalizations are integrated in the schedules of the Contractor.

Hand sanitizer and masks will be available for everyone who is entering in the site. Temperature will be taken every morning prior to the starting of work. Those measures will help to mitigate COVID-19 related risks.

The Health and Safety Plan includes an assessment of the risks to the health of employees through exposure to hazardous materials, and describes the medical monitoring implemented by specially providing opportunity for counselling related to STDs and provision of prophylaxis.

7.12 Health

Drinking water

- On all Sites, the Contractor provides its staff with drinking water of a quantity and quality in accordance with World Health Organization standards at feed points.
- Regardless of the Contractor's drinking water supply, the quality of drinking water supplied to workers is tested at least monthly. Sample collection and analysis protocol follows World Health Organization recommendations.

Housing conditions

- Unless otherwise specified in the contract, or unless instructed otherwise by the PCU, staff are housed in rooms and women will have their own secure and independent rooms and toilets if they are part of the staff.
- Night-time noise levels experienced by staff are within the maximum limits recommended by the World Health Organization.
- In the accommodation of its staff, the Contractor provides 1 drinking water tap for 10 employees, a shower for 10 people maximum, an individual toilet for 15 people maximum, 1 urinal for 25 men.
- Separate and secure toilet blocks for women and locker rooms for women.
- Fire extinguishers are placed in each building at clearly marked points and making a fire outside the kitchen area is strictly forbidden.

Public meeting areas

- Sanitary spaces (showers, wash basins, urinals, toilets) are cleaned and disinfected by the Contractor's cleaning service at least once every 24 hours, and this cleaning is documented.
- The canteen, kitchen and kitchen utensils are cleaned after each meal service.

7.13 Sexually transmitted diseases and infection

Regarding information campaigns, awareness-raising, and consultation on *sexually transmitted disease* (STD) and *sexually transmitted infections* (STI) (HIV/AIDS), SEA/SH risks and correlation between GBV and HIV/AIDS the Contractor must throughout the contract:

- Involve the Public Health staff working at the nearest health facility to conduct Health Education and consultation,

At least every two months, sensitization activities will be addressed to all site personnel and workers (including all employees of the Contractors, all subcontractors and all employees, as well as all truckers and site deliveries for construction activities) and immediate local

communities, regarding risks, hazards and impacts, and behaviors sexually transmitted diseases (STD) or sexually transmitted infections (STI) in general, and HIV/AIDS, in particular;

- Provide male or female condoms to all site staff and workers as appropriate; and

Provide all staff and workers with STI and HIV/AIDS screening services, diagnosis, counseling, and referral to a dedicated national STI and HIV/AIDS program (unless otherwise stated).

7.14 Substance abuse

Any use, possession, distribution, sale of illegal drugs, controlled substances (under local law) and alcohol is totally prohibited. The Contractor implements a zero-tolerance policy regarding the abuse of these substances.

Any person suspected of being under the influence of alcohol or controlled substances by the Project Manager is suspended immediately from his/her workstation by the Contractor pending medical results.

7.15 Sexual Exploitation and Abuse and Sexual Harassment

The Contractor will ensure compliance with the PCU's SEA/SH Prevention and Response Action Plan, including:

- The Accountability and Response Framework, which is part of the C-ESMP.
- Specific measures will include: ensuring that the population and project staff are aware of the availability of an effective grievance mechanism (GM) with multiple channels to initiate a complaint including complaints of workplace harassment as well as sexual exploitation and abuse and procedures to ensure the ethical and confidential management of SEA/SH-related claims;
- Engaging a consultant with GBV specific skills and experience to supervise SEA/SH risk mitigation, prevention, and response measures (e.g., supervise signing of Codes of Conduct (CoCs), verify working GM for SEA/SH-related claims is in place,
- Ensure that a response protocol and referral pathway for survivor support services are in place);
- Collaborate with GBV service providers to ensure appropriate referrals for services and to raise awareness of the GM; ensuring that construction is conducted to the extent possible during school holidays and weekends to minimize contact between workers and children;
- Ensure that Codes of Conduct, including clear and unambiguous language on prohibited behaviors and sanctions in relation to SEA/SH, are signed and understood by all contractor staff (including ensuring that requirements in CoCs are clearly understood by those signing, having CoCs signed by all those with a physical presence at the project site; having the GBV Consultant assist with training project-related staff on the behavior obligations under the CoCs; disseminating CoCs, including visual illustrations, and discuss with employees and surrounding communities);
- Ensure that, with the support of the GBV Consultant, project staff and site workers are provided training on SEA/SH risk mitigation measures, including information about SEA/SH in general terms, codes of conduct, the GM, and how to access services if needed; organize with the support of the GBV Consultant awareness-raising sessions to local communities on SEA/SH prevention and response;
- Undertake regular M&E of progress on SEA/SH risk mitigation, prevention, and response measures, including reassessment of risks as appropriate; and ensuring the safety of work-sites for women, including having separate, safe and easily accessible facilities for women and men working on the site, ensuring that locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside, visibly displaying signs around the project site (if applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited, and ensuring that as appropriate, public spaces around the project grounds are well-lit.

8. LOCAL LABOR AND RELATIONS WITH THE COMMUNITIES

Prior to the starting of the works, the contractor will do a sensitization campaign in collaboration with the project GBV Consultant in all the affected areas to explain to the population how the works will take place as well as the dangers or hazards of their activities, including SEA/SH-related risks.

The PCU will also do the same activity by explaining the Grievance Mechanism to the local population and authorities in collaboration with the GBV Consultant, including multiple channels available to lodge SEA/SH-related complaints and how to access survivor support services if needed. This will help to improve the relationship between the Project and the affected communities.

8.1. Local Recruitment

Local recruitment is defined as the number of posts allocated to people residing in the region of work (less than one hour of transportation to the Site) for more than one year and the nationality of the country where the work is executed.

The Contractor implements a voluntary local recruitment procedure for its staff during the duration of the work and requires its Subcontractors to do the same.

In the Gambia, except working as a cleaner, office keeper and cooker, there are very few women employed for this type of works, especially in the remote areas where these schools will be built. But the contractors will encourage women to enlist for employment in project activities without any impediments.

Contractor will also develop a hiring plan that would include hiring labor from within the community giving equal opportunity to men and women – there should be a stronger measure to ensure women are hired in the project in diverse roles and a sensitization session for the community about hiring men and women, why it is important, etc. This measure will be monitored during implementation to see the number of women hired during project implementation. Men will be engaged in activities promoting the hiring of women to ensure their buy-in and support of these activities so as not to create further risk of intimate partner violence within households whereby gender norms are challenged as women begin to work, bring home additional income, and enjoy greater economic independence.

The Contractor and the PCU will enforce and monitor codes of conducts prohibiting SEA/SH and adapt and implement a SEA/SH Prevention and Response Action Plan, including the measures noted above.

The Contractor will also develop a training program to support this voluntary approach of local recruitment.

8.2 Local labor requirements

Local labor requirements are estimated prior to the start of work (10 to 15 people per site according to FIOHTG) and described, with the following information:

- Identification of the job profiles that can be filled by the required premises and qualification levels
- Definition of the planned mechanism for the effective recruitment of these profiles
- Deployment schedule for these positions
- Initial training to be given by the Contractor related to each job profile
- Proceed to a sensitization campaign before the works start in order to explain to communities, positions available, how to apply. These opportunities must be equally open to men and women, and women should be specifically targeted to ensure that they are aware of the open positions and how to apply.
- Contractor will also develop a hiring plan that would include hiring labor from within the community giving equal opportunity to men and women – there should be a stronger measure to ensure women are hired in the project in a variety of roles and a sensitization session for the community about hiring men and women, why it is important, etc.

Local recruitment on the site, including entry, is prohibited.

One month before the start of the work, the Contractor establishes a local recruitment office in the local community on which the main site is located, in a location previously approved by the PCU. The Contractor, with the supervision and monitoring of the PCU, will assist applicants with low literacy levels.

The Contractor maintains a file per local employee recording the hours worked by each person engaged on the work, the type of work, the wages paid, and the training carried out. These records must always be available on the Main Site so that they can be reviewed by the Project Manager and authorized government officials.

8.3 Child labor

The Contractor will strictly adhere to the regulations of The Gambia regarding the child labor in construction sites and also in World Bank Codes of Conduct regarding Violence Against Children.⁴ Contractor, subcontractors, their managers and staff will adhere to the World Bank Codes of Conduct. The implementation of those Codes of Conduct will be monitored by the PCU to verify if the Contractor is enforcing their implementation.

In The Gambia, in accordance with ILO Convention No.138, the minimum age for admission to employment is 15 years.

For hazardous work, it is forbidden to employ children under 18 years of age to work exceeding their strength, presenting causes of danger or which by their nature and the conditions in which they are carried out are likely to harm their morals concerning Child Labor Act, which lists the prohibited work for children under 18 years of age). The contractor shall include the ages of all employed workers and list means of age verification with documentation. A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the 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.

Work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work:

- with exposure to risks of physical, psychological, or sexual abuse
- underground, underwater, working at heights or in confined spaces
- with dangerous machinery, equipment, or tools, or involving handling or transport of heavy loads
- in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise or vibration damaging to health under difficult conditions such as work for long hours, during the night or in confinement on the premises of the employer

8.4 Codes of Conduct and Implementing ESHS and OHS Standards for Preventing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

The Contractor, its managers and employees, and others working on the project must sign *Codes of Conduct and Implementing ESHS and OHS Standards for Preventing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)* (Annex O). These Codes of Conduct address the acceptable and expected behavior between the Contractor and all workers in the project as well as members of local communities.

⁴ The employment of children must comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labor and minimum age. They must also be able to meet the project's Occupational Health and Safety competency standards.

The directors, employees and other workers should not engage in any form of gender-based violence,⁵ including sexual exploitation and abuse (SEA)⁶, sexual harassment (SH)⁷, and violence against children⁸ and adults⁹. If it is found that they do so, their employment or employment contract will be terminated, as soon as the act is first noticed, with the transmission of the characteristic elements of the act for prosecution to the competent public authority, upon informed consent by the survivor only unless there are mandatory reporting obligations in place. The Contractor will comply with local and national laws regarding the notification of the police (women and child welfare unit) and local authorities where required.

GBV encompasses multiple forms of physical, sexual, and psychological or emotional violence, as well as denial of economic opportunity, in the community by resident and non-resident business workers, which can include rape, sexual exploitation and abuse, as well as sexual harassment.

8.5 Transportation and accommodation

The Contractor shall provide or make available the daily transportation for employees not accommodated in Contractor-managed premises and living more than 15 minutes' walk from the place of work and within one hour of transport.

The transport will take place in conditions respecting local regulations and ensuring the safety of the people transported.

The Contractor can organize this transport collectively: hours and locations are set and served accordingly.

If the Site is moved during the work season and the Contractor retains local trained labor at the start of the work, the employee's accommodation (housing and food) is then taken care of by the Contractor. This last will sensitize and train those workers to avoid any social risks and conflicts.

During transportation, all staff will wear their mask, hand sanitizer will be available inside the car, and social distancing. One meter, at least, between each occupant to limit spread and contamination of COVID-19.

8.6. Damage to people and property

The Contractor is responsible for the physical, psychosocial and assets impact caused by the conduct of the work or the modalities of its execution to the community members.

⁵ **Gender-Based Violence** is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed gender differences.

⁶ **Sexual Exploitation** is defined as 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. **Sexual abuse** is defined as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

⁷ **Sexual harassment** is defined as 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 offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

⁸ Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

⁹ Unless there is full consent by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.

The PCU is informed of any damage to persons, or property of persons, outside the Contractor's work within six hours of the event, regardless of the value of the damage.

8.7. Circulation and management of rolling stock (traffic management)

The Contractor defines the characteristics of its fleet of vehicles and construction equipment. In the month following the start of the work, the Contractor shall inform the administrative authorities whose jurisdiction is traversed by the vehicles of the works, the route and the characteristics (frequency of the passages, size and weight of the trucks, transported materials) of the fleet of vehicles of the Contractor. Unless the PCU or relevant authorities order otherwise, night driving between 22:00 and 06:00 is prohibited for all heavy vehicles (e.g., total permissible gross weight exceeding 3.5 tons).

a) Regarding speed of vehicles and machinery of construction

The Contractor implements speed limitation and control measures for all vehicles and machines used for the execution of the work.

The maximum speed of all vehicles and vehicles of the Contractor must comply with the most stringent of the two rules below: the one fixed by the national regulations or the specifications below:

- 10km/h within the Sites.
- 30km/h in the villages or hamlets, from 100m before the first house.
- 50km/h in the villages.
- 80km/h on unpaved roads outside town, village or hamlet and basecamps.

In coordination with the competent national services, the Contractor provides and sets up along the public roads, signaling for the use of its vehicle fleet when the public signaling is deficient.

The Contractor provides each driver, and ensures its understanding, a mapping to an appropriate scale of roads authorized for the conduct of work, where the maximum speeds allowed are clearly identified.

The transport of persons, equipment, and products other than for the needs of the works and the management of the Sites, is strictly prohibited on board any vehicle of the Contractor. This provision also applies to the transport of live animals or meat resulting from hunting, fishing, or poaching.

Trailers and skips used for transporting materials that can be sprayed (sand, all-weather, aggregates, selected materials) are covered over the entire route separating two Sites.

b) Road Traffic

In terms of road traffic, the Contractor is responsible for:

- Defining measures to be put in place to make employees aware of responsible driving and existing hazards.
- Setting up signage at the entrance to the Construction Site to warn residents or anyone outside the site.
- Establishing the instructions to be observed on the Construction Site in terms of pedestrian traffic and machinery.
- Determine preventive measures in the vicinity of construction sites in order to maintain optimum safety conditions on the roads and thus avoid any damage or injury to a third party.

In addition, the Contractor carries out a monthly inspection of all vehicles and machines based on a standard inspection sheet (for engine, chassis, lights, etc.). Regular maintenance is done in case of equal

circulation distance from 8,000 to 10,000 km. The tires will have to be replaced during normal driving distance greater than 50,000 km and the use of used tires is forbidden.

9. ADDITIONAL AND SPECIFIC MEASURES

9.1. Polychlorinated Biphenyls (PCBs) and Chlorofluorocarbons (CFCs) management:

Equipment containing PCBs or PCB-contaminated soils must not be installed and existing equipment involving PCBs or PCB-contaminated soils must be disposed of in a manner consistent with the country's requirements.

Polychlorinated Biphenyls (PCBs): Transformers or equipment containing PCBs or PCB- contaminated soils must not be installed and existing equipment involving PCBs or PCB-contaminated soils must be disposed of in a manner consistent with the country's requirements.

Chlorofluorocarbons (CFCs): Centralized processes, equipment and cooling systems involving the potential use or release into the environment of CFCs, including halons, should not be installed, and their use in existing processes and systems should be phased out. A way compatible with the requirements of the country.

9.2 Relations with Riparian Communities

Information, Education and Consultation campaign with local communities. The Contractor must throughout the construction period carry out information and awareness activities to maintain good relations with local communities. These activities aim to:

- Inform local communities in advance about the construction schedule;
- Gather information from local communities about their needs and concerns;
- Involve local communities in the construction planning process;
- Educate the local population about the dangers and safety measures to be observed near construction sites.
- The Contractor must, as much as possible, respect the **work schedule** presented to the local population.

Awareness of the work force. The Contractor must conduct awareness meetings with his or her staff to inform them of the following aspects:

- Respect for the habits and customs of the population of the region
- Prohibition of staff hunting and poaching wildlife, especially near and in Parks or Reserves

The Contractor shall maintain circulation and permanent access for residents during construction. The inhabitants concerned are those whose dwelling was on the site before work began.

Get permission before entering a private property. Any intervention on a private property must first be approved by the landowner. Access for surveys and authorization for the clearing of brush and small trees must be authorized by the PCU. The surveyor of the Contractor must always announce himself to the occupant immediately before entering a private property for the surveys and must not fell or prune any tree, shrubs, or bush without prior authorization.

Ensure the safety of local communities. Ensure the safety of residents during construction by appropriate measures (fencing, supervision, etc.).

9.3 Internal audits

All the procedures identified and described in the set of articles of this C-ESMP will be the subject of regular internal audits carried out by FUTURE IN OUR HANDS THE GAMBIA.

These audits are primarily aimed at:

- Determine compliance or non-compliance of activities with prescribed requirements.
- Determine the effectiveness of the system implemented to meet the prescribed objectives.
- Give the auditee an opportunity to improve their system.
- Meet regulatory requirements in the areas of safety and the environment.
- Meet the specific requirements of the customer.

LIST OF ANNEXES

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Annex P: Risk Analysis

Annex A: Grievance Mechanism (a separate GM is developed in another document under review)

The project grievance mechanism will handle complaints in accordance with its mandate.

On each site, will be setup a **Registry of Complaints** whose primary purpose of this register is to identify the issues or problems of local people related to the completion of work and provide a solution for each problem encountered.

These complaints may include disputes between suppliers and the contractor, environmental and social impacts (noise pollution of the machinery, respect for customs, etc.) health and safety at work and labor issues, which can be addressed through a separate mechanism dealing with labor relations and other professional issues.

On each site a form for the collection of complaints is made available at the level of the entry. The procedure is as follows:

- (i) or her and contact information so that he or her can recontact him or her and detail his or her complaint and the evidence to support it;
- (ii) Once signed by the complainant and the receiver, a copy is given to the complainant pending the processing of his or her complaint;
- (iii) The HSE Officer receives the complaint and must then deal with it by putting in place the necessary measures;
 - The complaint is recorded in the complaint register and appears in the monthly ESSH report.

Separate procedures for registering and responding to SEA/SH-related incidents will be followed.

Annex B: Grievance Logbook (non-SEA/SH incidents)

[illegible]

Annex C: Procedure in case of Chance discovery of remains

In case of the chance discovery of archaeological, historical and customary remains, the works will be suspended within a certain perimeter (of 50 meters, for example) around the discovered remains.

To resolve this issue, the Contractor will then call on a competent national institution (for example, the Records and documentation unit of the Ministry of Arts and Culture) or, where appropriate, a qualified archaeologist. After the suspension of the work, the company must immediately report the discovery to MOBSE through FIOHTG. With the approval of the MOBSE, the company is then asked to temporarily delimit the site and restrict access to it.

The contractors may be authorized to suspend the work and to carry out excavations at his own expense if it considers that a discovery that has just been made has not been reported.

The company must then, at the request of the site manager and within the specified time, draft a chance discovery report providing the following information:

- Date and time of discovery
- Location of discovery
- Description of the physical cultural property
- Estimation of the weight and dimensions of the property
- Temporary protection measures implemented
- Arrival of cultural services and measures taken regarding the findings

The cultural heritage departments shall arrange for the arrival of a representative at the discovery site within an agreed time (e.g. within 24 hours) and determine the actions to be taken, including:

- Withdrawal of physical cultural property deemed important
- Continuing excavation work within a specified radius around the discovery site
- Enlargement or reduction of the area defined by the company
- A report of such a discovery must be drawn and shared with the various stakeholder.

The company may, but not necessarily required, ***claim compensation*** for this additional period of suspension of work.

Annex D: Mitigation measures: Pre-construction and construction

Components of the environment	Impact	Mitigation measures
Quality of the air	<ul style="list-style-type: none"> Degradation of air quality (dust and atmospheric emissions) 	<ul style="list-style-type: none"> Provide transport vehicles and machinery with anti-pollution devices. Close to inhabited areas, avoid heavy vehicle traffic or use appropriate means to minimize the dispersion of dust
Quality of the water	<ul style="list-style-type: none"> Water quality impaired by the introduction and suspension of sediments Risk of contamination of surface and groundwater by hydrocarbons and other dangerous products Risk of sewage contamination in workers' camps 	<ul style="list-style-type: none"> In geotechnical studies, establish adequate drilling practices. Seal properly wells and boreholes before their abandonment Control vehicles and machinery to prevent leakage and spills of hazardous materials (hydrocarbons, etc.) Comply with the water standards and treat the waters accordingly. Keep vegetation near streams Limit as much as possible the number of crossing points of watercourses. Use existing bridges and culverts Make the crossing where the banks are stable and the watercourse narrow:
		<p>(December-January a mean Gambian average)</p> <p>-At the end of the water works, restore, if necessary, the normal flow of water courses and return to the original state the bed and bank.</p> <p>Prohibit any movement of construction equipment within 20m of permanent watercourses and less than 5m from intermittent watercourses, except on planned roads.</p> <ul style="list-style-type: none"> Stack woody waste more than 20m away from streams and not store any other material 60m Prohibit the refueling of petroleum products from vehicles and construction equipment within 60m of water courses Reduce the possible entrainment of erodible material at the edge of a stream by constructing ditches or barriers and directing runoff to vegetated areas; install devices to capture sediments.

Components of the environment	Impact	Mitigation measures
Flow of waters	<ul style="list-style-type: none"> Disturbance of the normal flow of water 	<ul style="list-style-type: none"> Plan response times in areas prone to flooding or heavy runoff outside of flood or high rainfall seasons. Do not impede the drainage of surface water and provide recovery measures. Respect superficial drainage always; avoid obstructing streams, pits or any other channel; remove any debris that impedes the normal flow of surface water. Directing runoff and drainage so that they bypass the worksite and direct them to vegetation areas; install devices to capture sediments.
Soils	<ul style="list-style-type: none"> Erosion and destabilization of soils and slopes Soil compaction Risk of soil contamination caused by accidental release of hazardous products 	<ul style="list-style-type: none"> Use deforestation methods that maintain a minimum vegetation cover (shrub or herbaceous) After deforestation, mechanically stabilize bare soil to reduce erosion potential. Avoid work on steep slopes. Limit interventions on erodible soils; choose vehicles adapted to the nature of the soil. Avoid providing access in the axis of long continuous slopes, rather favor a perpendicular or diagonal orientation. At the end of the work, level the reworked soils and favor the establishment of a stabilizing herbaceous layer. Loosen compacted soil by machinery. Strictly regulate the movement of heavy machinery; restrict the width and number of traffic lanes; limit the movement of machinery to work areas and marked access. Provide facilities for vehicle traffic whenever there is a risk of compaction or alteration of the surface. Restore the intervention sites by restoring the original soil. Use existing loan banks. Restore the borrow pits that will no longer be used by stabilizing the slopes, covering them with the original organic soil and promoting the restoration of vegetation. Soil contaminations due to accidents and spillages must be cleaned and the area treated with sand to mitigate

Components of the environment	Impact	Mitigation measures
Terrestrial vegetation	<ul style="list-style-type: none"> • Damage to vegetation • Collecting forest products by workers • Loss of productive vegetation (natural forest and plantations) • Possibility of invasion of exotic plants in the camp site and around construction sites • Increased risk of bush fires • Risk of disturbing protected species and of particular interest. 	<ul style="list-style-type: none"> • Clearly define cutting areas to limit deforestation. • Move the equipment away from the vegetation. • Protect trees from machinery along the basecamp. • Protect the roots of trees, by prohibiting the movement of machinery in the perimeter corresponding to the projection of the crown towards the ground; mark it. • Preserve useful trees that have been spared during agricultural clearing (<i>Parkia biglobosa</i>, <i>Parinari excelsa</i>, Etc.) • Recover forest products from deforestation and put in place mechanisms to distribute them among the local population. • Weed a buffer zone around the area of work and worker camps to prevent the spread of bushfires and to keep at disposal the equipment needed to control the fire (pumps, etc.) as part of the emergency measures. • Inventory individuals of protected species present in the company and at post sites and compensate for the potential loss of these individuals through equivalent planting. • In areas potentially rich in biodiversity (such as denser forest areas and wetlands), inventories should be planned to optimize the construction site alternatives or design alternation and thus avoid disturbance of species of particular interest. The design of the facilities has avoided trees, nonetheless, MOBSE PCU will work with the Department of Forestry in order to develop a tree planting plan for the school to engage schools and students in the protection of the Environment.
	<ul style="list-style-type: none"> • Banks and sedimentation in streams • Collecting forest products by workers • Disturbance of the banks • Cutting riparian vegetation 	<ul style="list-style-type: none"> • Compensate vegetation losses in wetlands (mangrove forest-gallery) by protecting or improving other forest- (normally signing a MOU with Dept. of Forestry) galleries; the sites to be protected will be identified in collaboration with the Dept. of Forestry and NGOs working on conservation in the Gambia.

Components of the environment	Impact	Mitigation measures
	<ul style="list-style-type: none"> Risk of disturbing protected species and of particular interest. 	<ul style="list-style-type: none"> Consider great flexibility in methods for crossing wetlands, particularly those associated with the fluvio-marine plains of major rivers. Avoid deforestation and destruction of riparian vegetation as much as possible. If necessary, use manual deforestation methods along the banks. (Mangrove Planting exercises) When cutting, lay out the stowage areas for the wood outside the wet areas.
		<ul style="list-style-type: none"> In areas potentially rich in biodiversity (such as gallery forests), provide inventories to optimize the route and avoid disturbing species of special interest.
Protected areas	<ul style="list-style-type: none"> Loss of vegetation in classified forests Collecting forest products by workers Disturbance of wildlife habitat 	<ul style="list-style-type: none"> Obtaining authorizations to perform work in classified forests through Dept. of Forestry. Offset the loss of vegetation cover in forests classified by reforestation within these same classified forests Apply to the classified forests the set of recommended measures for the other environmental components (water, air, soil, vegetation, wetlands, fauna)
Terrestrial and avian wildlife	<ul style="list-style-type: none"> Temporary disturbance of wildlife during construction Loss or deterioration of habitat suitable for wildlife. Poaching from the presence of workers 	<ul style="list-style-type: none"> Do not do any work in wildlife breeding areas during the breeding season. Develop the work schedule and schedule of activities considering wildlife uses of the territory. Avoid migratory bird habitats. Prohibit hunting of project workers.

Components of the environment	Impact	Mitigation measures
Aquatic wildlife	<ul style="list-style-type: none"> • Loss or deterioration of habitat suitable for breeding aquatic wildlife • Indirect effect on habitat of aquatic fauna due to degradation of water quality • Increased fishing due to the presence of workers 	<ul style="list-style-type: none"> • Protect recognized spawning areas • Prohibit fishing for project workers • Avoid migratory routes for turtles and protect their nest sites
Population	<ul style="list-style-type: none"> • Potential losses for women related to compensation criteria and/or mechanisms • Potential losses of women's mean of production 	<ul style="list-style-type: none"> • The screening of the sites has not identified these types of risk, but in case it happens, we need to develop an Abbreviated Resettlement Action Plan (ARAP)

	<ul style="list-style-type: none"> • Limit access of women to economic opportunities, increased workload of those hosting workers and disruption of women's activities 	<ul style="list-style-type: none"> • Provide mechanisms to consult women and men (separately if possible) • Facilitate the creation of women's groups or consult with existing groups to ensure they are organized and represented • Ensure that project proponents do not reinforce cultural barriers that prevent women from accessing non-traditional jobs. • Offer the same employment opportunities within the project to women and men, encourage women to apply and select candidates according to their skills • Ensure that women have access to the equal access to the same facilities as men to take advantage of business opportunities • Ensure that men and women have equal access to project managers to inform them of their respective needs • Involve women from host communities in non-resident accommodation decisions
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<p>Health, Safety, and Well-being</p>	<p>increased incidence of HIV/AIDS, STIs and TB Increase in respiratory diseases due to transport activities Risk of food shortage and worsening of malnutrition Increased risk of accidents caused by work and the use of unskilled labor Risk of malaria and schistosomiasis</p>	<p>Raise awareness and educate the populations of agglomerations crossed by the access roads and the posts as well as the workers on the health risks related to unprotected sexual relations, in particular to the possibilities of propagation of the AIDS Ensure that agglomerations have an adequate inventory of condoms to prevent diseases and that these are available in health facilities, gas stations and small displays for the sale of various products Collaborate with communities' notes to facilitate exchanges with non-resident workers, while avoiding promiscuity Establish worker camps at a reasonable distance from surrounding populations, ensure that the camps provide access to basic services (drinking water and sanitation) and set rules for managing relations between workers and villagers Ensure the syndromic management of STIs (training of staff, implementation of generic drug kits) by the staff of the health centers. All while encouraging local purchases, ensure that food supplies for workers do not exceed local supply capacity, by facilitating supply from local or regional urban agglomerations To prevent schistosomiasis, drink safe water as recommended by the WHO, if the water available is not safe:</p> <ul style="list-style-type: none"> • Water used for bathing should be brought to a rolling boil for 1 minute to kill any cercariae, and then cooled before bathing to avoid scalding. Water held in a storage tank for at least 1 – 2 days should be safe for bathing. • Vigorous towel drying after an accidental, very brief water exposure may help to prevent parasites from penetrating the skin. However, do not rely on vigorous towel drying alone to prevent schistosomiasis. <p>Regarding malaria, the prevention measure will be to provide workers with mosquito nets and also avoid stagnant water which is natural habitat of the mosquitos.</p>
	<p>Increased risk of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)</p>	<ul style="list-style-type: none"> • Develop and implement procedures for the ethical and confidential management of SEA/SH-related risks, including mitigation, prevention, and response. • The procedure should focus on all project-related risks of SEA and SH. This will include ensuring that work spaces are safe and secure for women as outlined in the above document; that codes of conduct are developed, understood, signed, and complied with by all workers; that appropriate GM procedures are developed to handle SEA/SH claims ethically and confidentially; that project personnel and site workers are appropriately trained on SEA/SH, codes of conduct, and GM procedures; that communities are aware of the codes of conduct and how to report any incidents; that efforts are taken for construction to occur during school holidays and weekends when children are not present to avoid contact with workers. • The SEA/SH Prevention and Response Action Plan should clearly indicate how the costs of these measures will be paid for in the contract. This could be, for example, by including: (i) items in the cost estimate for clearly defined SEA/SH mitigation, prevention,

		and response activities (such as the preparation of relevant plans) or (ii) provisional amounts specified for activities that cannot be defined in advance (such as for the implementation of the relevant plan(s), by engaging GBV service providers, if necessary).
	Impacts on landscape and community health	<p>Provide transport vehicle and silencer machinery.</p> <p>Choose the location of the workers' sites and camps in order minimize the impact the impact of the surrounding populations.</p> <p>Avoid the storage of machinery and materials on areas other than those defined as essential for the work and provide for clear identification of the boundaries of these areas.</p> <p>Minimize waste accumulation associated with the disposition of building materials.</p> <p>Avoid the accumulation of all types of waste outside and on the work site and evacuate them to the disposal sites provided for this purpose.</p> <p>Carefully plan housing, basic services (water and sanitation) and food supply for non-resident workers and their families, where possible, labor-intensive construction techniques and by providing prior technical training with additional training or on-the-job training.</p>
Quality of life and employment	<ul style="list-style-type: none"> • Employment of local workers and increase in community income • Exclusion of vulnerable people from access to project benefits 	<ul style="list-style-type: none"> • Ensure the employment of local labor during construction activities • Inform the local population (men and women) of the potential benefits of the project for the community and especially employment opportunities, ensuring that women are specifically targeted in awareness-raising activities to ensure that they are consulted and informed about employment options and related hiring processes. • Assist, if they wish, groups of individuals (men and women) who may need help to fill out an application for employment • Promote local employment by focusing on intensive construction techniques in labor • Provide training that can help the people (men and women) directly affected by the project so that they can benefit from new opportunities resulting from project development • Ensure that machinery runs at reduced speed in work areas and marked areas. • Control access to construction sites and machinery storage areas. • Develop, communicate, and implement safety and accident prevention measures for residents during work (fencing, supervision, etc.) • At the end of the construction works, properly clean and restore construction sites and surrounding areas that have been affected by the construction activities • Encourage women to enlist for employment in project activities without any impediments put in their way • Contractor to develop a hiring plan that would include hiring labor from within the community giving equal opportunity to men and women – there should be stronger measures to ensure women are hired in the project, including for non-traditional roles, and a sensitization session for the community about hiring men and women, why it is important, etc.

		<ul style="list-style-type: none"> • 50/50 sharing of project benefits between men and women • Enforce and monitor codes of conduct prohibiting SEA/SH and implement SEA/SH Prevention and Response Action Plan
Quality of life, property, and livelihoods	<ul style="list-style-type: none"> • Process of acquiring land or moving people from their land or economic displacement of their livelihood 	<ul style="list-style-type: none"> • Develop an ARAP in line with World Bank Policy OP4.12
	<ul style="list-style-type: none"> • Landscape modification • Dust, pollution, noise levers and waste accumulation near construction sites and workers' camps • Poor living conditions of workers, social conflicts due to their arrival • Development of new skills 	<ul style="list-style-type: none"> • Consult the people at all stages of project planning • Set up a communication program to inform people of work in progress • Involve local authorities during work to minimize the disruption within host communities • Set up a GRC • Plan construction activities to avoid disturbing traffic and minimize the impact on the landscape, the sound environment and lifestyle of the host population • Choose equipment to integrate them to the architectural heritage • Optimize the location and architecture of the equipment to integrate into the landscape • Give preference to the places where the equipment will be least visible, foresee if necessary, technical training to fill these jobs • Provide specific training for those most vulnerable, illiterate, physically disabled, women headed household, etc. so that they can have equal access to the benefits of the project • Promote the purchase of local inputs (goods and services)
	<ul style="list-style-type: none"> • Damage to the property • Contractor will pay the damages to compensate the person affected 	<ul style="list-style-type: none"> • Compensate for damages
Economic activities	<ul style="list-style-type: none"> • Loss of productive agricultural and pastoral land and other livelihoods related to their lands and access to their lands 	<ul style="list-style-type: none"> • Change of construction site or design

	<ul style="list-style-type: none"> • New business opportunities 	<ul style="list-style-type: none"> • Encourage the contractors to buy local by proposing measures to help local traders to respond to demand. An example of a measure could negotiate the price with local merchant by offering a cash advance, to allow him to stock up in nearby urban centers to meet the increased demand. However, care must be taken not to create a shortage in the area.
Use of natural resources	<ul style="list-style-type: none"> • Employment of local workers and increase of community incomes • Exclusion of vulnerable people in access to project benefits 	<ul style="list-style-type: none"> • Coordinate the project activity with the different users of the territory (men and women) • Provide on-the-job training for communities that will be deforested with local trees, if possible • Provide a mechanism for equitable management and redistribution of forest products for areas cleared for construction work • Provide transportation vehicles and silencer machinery • Choose the location of the workers' sites and camps in order to minimize the impact of the activities on the surrounding populations • When nuisances are anticipated (such as interruption in electricity service), notify authorities and the populations concerned and take appropriate measures to reduce the duration and scope of nuisance • Avoid the storage of machinery and materials in areas other than those defined as essential for the work and provide for clear identification of the boundaries of this area • Minimize waste accumulation associated with the disposition of building materials • Avoid the accumulation of all types of waste outside and on the work site and eventually by evacuating the waste to designated dumpsites • Wisely plan housing, basic services (water and sanitation) food supply for resident workers and their families • Encourage local employment by promoting as far as possible, intensive labor-saving techniques and by providing technical training in addition to other training or on the job training

Life and employment level	<ul style="list-style-type: none">• Employment of local workers and increase of community incomes• Exclusion of vulnerable people in access to project benefits	<ul style="list-style-type: none">• Ensure the employment of local labor during construction activities where possible• Inform the local population (men and women) of the potential benefits of the project for the community and especially opportunities for employment• Assist, if they wish, groups of individuals (men and women) who may need help to fill out an application for employment.• Promote local employment by favoring labor intensive construction techniques.• Provide training that can help the people (men and women) directly affected by the projects so that they can benefit from the new opportunities provided by the interconnect project. It will identify the employment bodies needed for construction activities
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Use of the ground	<ul style="list-style-type: none"> • Destruction or damage of agricultural land and existing infrastructure 	<ul style="list-style-type: none"> • Promote the use of equipment with reduced surface area to minimize the loss of space • Choose locations near property boundaries or at the end of blocks. • Locate equipment as much as possible on the boundaries of lots or cultivated areas or distribute them so as to minimize the number. • Prior to the work, verify with the owners or operators the intended use of the lots and perform the work in a manner that is least harmful to existing crops and cultural practices. • Minimize areas where it will not be possible to cultivate during and after the work. • Guarantee access to isolated areas always. • Access the property by the existing roads or circulate at the edge of the spaces planted. • Develop the accesses in collaboration with the operators of the concerned lot. • Restore rights of way by restoring the original soil.
	<ul style="list-style-type: none"> • Interruption or temporary disruption of public services and pressure on them caused by the presence of non-resident workers • Development of new access routes 	<ul style="list-style-type: none"> • When it is necessary to interrupt a public service (road, drinking water, electricity, communication line, etc.), notify the authorities concerned so that they can warn the population. • Adjust the schedule of work so as not to disrupt traffic and, if required, establish an adequate diversion route • In urban areas, clean the streets of transport vehicles or machinery to keep them clean and free. • Avoid obstructing public access. • Bypass the meeting places. • Respect the bearing capacity of the roads or, if not, improve it before the work. Perform the required repairs after the work. • Plan paths of access and bypass in consultation with the concerned authorities so that they can serve other users.

Cultural and religious heritage	<ul style="list-style-type: none">• Loss of heritage sites• Discovery of heritage sites and cultural objects during construction activities	<ul style="list-style-type: none">• Provide archaeological monitoring during earth moving, leveling, and digging activities during the construction of the sites.• Involve traditional authorities in monitoring cultural, religious, historical, and aesthetic sites and resources during the different phases of the project.• In case of discovery, stop the work, take the appropriate protective measures, and contact the relevant government authorities. (Ministry of Arts and Culture)
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Annex E Responsibilities concerning the monitoring of the mitigation measures

- Project Coordinator (FIOHTG) (PC) of FIOHTG, construction Department supported by technical assistance, committees and network of experts, etc.;
- The Technical Management Unit (TMU) of the Project Coordination Unit (PCU) which will, among other things, monitor the implementation this ESMPCS;
- The Safeguards Unit (SU) of the PMU, which will also deal with social and environmental issues and their effects on local communities;
- National Environment Agency (NEA), which will be responsible for monitoring and supervising field activities, administrative facilitation and environmental monitoring;
- The contractor awarded the contract for the construction work.

Annex F: Work conditions

FIOHTG is encouraged, as far as possible, to recruit the staff and the workforce with the required qualifications and experience from the country of the Customer. In the absence of provisions contrary to the Agreement, the Contractor shall be responsible for the remuneration, accommodation, supply and transportation of personnel and man power in strict compliance with the regulations in force in complying, in particular, with labor regulations (in particular a regards working hours and days of rest), social regulations and all applicable health and safety regulations.

FIOHTG must not recruit or attempt to recruit the staff and human resources employed by the Customer.

FIOHTG must comply with the labor legislation applicable to its Personnel, including the legislation on hiring, health, security, social protection, immigration, and emigration, and shall grant him all rights resulting there from. FIOHTG shall require his staff to comply with the applicable law and regulations, including compliance with occupational safety.

When FIOHTG is authorized to subcontract part of the work, its subcontractors are bound by identical obligations.

Forced labor: FIOHTG shall not use forced labor, any work or service required of an individual under the threat of any penalty and for which the said individual has not offered willingly.

Child labor: FIOHTG will not employ children in a manner that is economically exploitative or likely to be dangerous or interfere with the child's education or is harmful to his or her health; or physical, mental, spiritual, moral or social development. If national law provides for the employment of minors, FIOHTG will respect the laws applicable to it. Children under the age of eighteen will not be employed in hazardous work.

Representation of the workers: In countries where national law recognizes the rights of workers to form and join workers' organizations of their choice without interference and to bargain collectively, FIOHTG will comply with national law. Where national law imposes significant restrictions on the representation of workers, FIOHTG will allow workers to use other means of expressing their grievances and protect their rights regarding work conditions and terms of employment. In either case and if the national law is silent on this point, FIOHTG will not dissuade the workers from forming or joining the organizations of their choice nor from bargaining collectively and will not discriminate and will not retaliate against workers who participate or plan to participate in such organizations and who engage in collective bargaining. FIOHTG will work with the workers' representatives. Workers' representatives are supposed to fairly represent workers constituting the labor force.

No discrimination and equal opportunities: FIOHTG will not make a recruitment decision based on personal characteristics unrelated to the needs inherent to the position to be filled.

FIOHTG will base the employment relationship on the principle of equality of opportunity and treatment and will not discriminate in the employment relationship, including recruitment and hiring, remuneration (including wages and benefits), work conditions and terms of employment, access to training, promotion, termination of the employment contractor retirement and discipline.

In countries where national law contains provisions on non-discrimination in employment, FIOHTG will respect national law.

Where national law is silent on non-discrimination regarding employment, FIOHTG shall comply with the provisions of this paragraph. Special measures of protection or assistance to the reparation of past

discrimination or selection for a specific post based on the needs inherent to this post shall not be deemed to constitute acts of discrimination.

FIOHTG shall remunerate its personnel and manpower at rates and under conditions at least equivalent to the rates and conditions in force in the business sector of the works. In the absence of such rates, FIOHTG will use local conditions and rates of pay used by contractors in a similar sector.

No work shall be performed on the Site during days of leave recognized by the regulations in force, or outside the normal hours of work mentioned in the CCAP, unless:

- a) The Market does otherwise;
- b) that the Project Manager does not agree; or
- c) that the work is unavoidable, or necessary for the protection of the installations, in which case FIOHTG must immediately inform the Prime Contractor.

Independently of the obligations prescribed by the laws and regulations concerning the labor force, FIOHTG is obliged to communicate to the Project Manager the updated list of the personnel he employs with their qualification.

FIOHTG must maintain a detailed breakdown by category of the workers it employs, which will be available for inspection during working hours, and provide a monthly summary to the Project Manager in a format approved by the latter.

CONSTRUCTION SITE SAFETY RULES

1. All management, subcontractors and other staff must attend a reception training which should be mandatory before the start of any civil works.
2. Nobody can report to work whiles under the influence of hard drugs or alcohol.
3. All individuals should wear protective gear at all time on construction site.
4. Identification badges must be worn by all on site including staff and visitors
5. No physical or verbal aggression will be allowed on site
6. All employee must respect the safety rules associated with their activity or method of work
7. Safety signs must be strictly respected.
8. Speed limits must always be respected on construction sites
9. Wearing seatbelts is mandatory in all contractors' and project vehicles
10. Work areas must be clean and access roads clear.
11. Waste disposal must be done designated areas in sites only
12. Do not touch firefighting equipment, except in case of emergency
13. Always use the right equipment for the right job.
14. Wearing a harness, equipped with a fall arrest and lanyard must be used when working at heights.
15. No corruption and or extortion will be allowed on site.
16. No sexual harassment or sexual exploitation or abuse will be allowed or tolerated at this site.

Any form of gender-based violence, sexual exploitation or abuse, or sexual harassment results in immediate suspension and start of an investigation that can lead to prosecution if proven to be factual and if consented to by the survivor. The GM developed by the PCU will have a special chapter on how to handle SEA/SH cases ethically and confidentially with a survivor-oriented strategy

respecting the anonymity of the parties involved as well as principles of survivor care and support.
The protocol is developed in the GM.

Annex G: ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

PART 1: GENERAL PROJECT AND SITE INFORMATION		
Name of Village/Site		
Location of site:		
Describe site location	<ul style="list-style-type: none"> • Hilly • Flat • Shrubs • Trees • Agricultural land 	
Who owns the land?		
What is the total area of the donor's land? What is the percentage of land donated (over or under 10%)		
Was there any compensation for the land? (i.e. monetary, land for land, arrangements of employment in the school, etc.)	Yes (describe)	No
Voluntary land donation documentation received? Tenure transfer documents received?	Yes Yes	No No
Brief description of geographic, and socio-economic context	<ul style="list-style-type: none"> • Size of village • Population (include number of women/men, children under 15) • • Main source of income/livelihoods (both for men and women) • Estimated number of children attending school 	
PUBLIC CONSULTATION (Take attendance list and write detailed notes/minutes of the meeting)		
When and where did public consultation take place		

How many community members attended				
How many women representatives				
How many representatives of other vulnerable or disadvantaged groups (i.e. elders, youth, persons with disabilities, etc.)	How many representatives of other vulnerable or disadvantaged groups (i.e. elders, youth, persons with disabilities, etc.)			
Is a Grievance Mechanism set up?	<ul style="list-style-type: none"> • If yes, document what the GM is when consultations about the GM took place and with whom • If no, discuss with the community setting up a GM and obtain their inputs on the process (see GM checklist for guidance – Annex V) 			
PART 2: ZONING ISSUES		Yes	No	Comments
i.	Will the school involve significant land disturbance or site clearance?			
ii.	Is the school located in an area susceptible to landslides or erosion?			
iii.	Will the school involve the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
iv.	Is the school located on agricultural land?			
v.	Will the school need to change the vegetation and /or cutting of trees on site			
vi.	Is the school located in an area with a wastewater network?			
vii.	Is the school located in a polluted or contaminated area?			
viii.	Does the school have access to potable water?			

ix.	Is the school located less than 100m of highway or access roads with traffic (if yes, review location and/or fencing)			
x.	Is the school located far (1-2 km) from accessible roads?			
xi.	Is the school located in an area with designated natural reserves or protected areas? [Note: If YES, the sub-project cannot be financed]			
xii.	Will the sub-project involve the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
xiii.	Is the school located next to a gully; or river where there is chance of flooding or inundation during rainy season			
xiv.	Is the school near areas prone to erosion			
xv.	Is the land of adequate size to accommodate pit latrine and water supply system			

GEOSP: SITE SCREENING CHECKLIST

Prepared by:

Reviewed and cleared by:

NAME:		NAME:	
TITLE:		TITLE:	
AGENCY		AGENCY	

DATE		DATE
SIGNATURE		SIGNATURE

ATTACHMENTS

- Site Map
- Photos
- Land donation documents (include record of consultation on land donation meeting, size of donor land and area of land donated)
- Tenure transfer confirmation documents
- Verification documents confirming voluntary land donation
- Consultation records (minutes and attendance list)
- Consultation photo

Annex H: Waste Register

Day of the Week	Organic waste	Plastic waste	Metals	Glasses	Chemicals	Other
Monday						
Tuesday						
Wednesday						
Thursday						
Friday						
Saturday						
Sunday						
Means of Waste Processing						

Annex I: EMERGENCY ORGANIZATION

TRIGGER AN ALERT when the following emergencies occur.

- Fire Outbreaks
- Accident at work, road accident
- Toxic Oil spillages, Epidemic and violent demonstration

EMERGENCY TEAM

- Country Director
- Project Coordinator
- ESHS Specialist
- Construction Site dispenser / Fire Officer /Security Agent / Local Police

IN CASE OF AN EMERGENCY

- REMOVE THE IMMEDIATE DANGER
- CALL THE EMERGENCY AND CLEARLY INDICATE:
 1. Who is calling?
 2. What happened and where
 3. How many victims
- Activate the alarm
- Go to assembly point

In case of a fire incident

- Where is the fire?
- What is burning?
- Are there any victims (possible deaths, injuries)
- Call emergency support

- Hotline numbers given to all employees
- Hotline numbers displayed in all sites and offices

Important Telephone Numbers	
Project Coordinator/ Works Supervisor	7839650
Nearest Hospital/Clinic	
Construction site dispenser/Health Care provider	
Nearest Police Post/Station	
Nearest Ambulance Station	
Nearest Fire and Rescue Station	
NEA Contact Number	

Annex J: EMERGENCY PROCEDURES

INSTRUCTIONS TO BE PROVIDED TO WORKFORCE

1. All personnel on the site should be trained to behave appropriately in an emergency (what to do and how to alert) in all conditions in the following order:

A) Protect B) Alert C) Rescue

Remove the hazard or eliminate the danger

ACTIONS TO BE TAKEN IN CASE OF AN EMERGENCY

- Eliminate the danger, shut down electricity sources and disconnect all power machines.
- Keep the non-designated staff from in the emergency area.
- Alert rescue by activating Alarm signal, light signal and call Ambulance service
- Inform the supervisor and help victim if possible
- Gather at assembly point.

PROVIDE CLEAR INFORMATION TO RESCUE TEAM

- Name of caller and Employer/ Company in the emergency
- Place of incident
- Nature of Accident and number of victims
- **Do not hang up until the rescue team tells you to do so.**

POST EMERGENCY INSTRUCTION AT CONSTRUCTION SITES AND BASE-CAMPS AND ALL STAFF AND CONTRACTOR SHOULD BE PROVIDED WITH SITE BADGES.

IN CASE OF A FIRE OUTBREAK

FIOHTG and all its Contractor must provide enough equipment to extinguish fire at all construction sites

- Fire extinguisher adapted to needs, type and class
- Fire extinguisher in each vehicle
- Fireproof tarpaulin cover and specific outfits for welder men
- Oxygenlenic burner with safety
- Staff training on how to use fire extinguishers

It is recommended

- a) To use a fire extinguisher, if the situation and fire size permits
- b) If the victim's clothes are burning, cover with a blanket or sprinkle with water

- c) Keep away any materials that can catch or fuel the fire
- d) Be careful not to caught by the fire
- e) Stay safe and avoid overreacting

The Environment and Social health and safety officer on the site will provide administrative and documentary follow-up of each fire and accident incident in accordance with the ESMPCS.

IN CASE OF AN ACCIDENT

FIOHTG and all its contractors must make sure in accident situations the Equipment, Instructions, Rescues, and follow-up are well coordinated in the case of an accident.

1. Equipment

Each site must have emergency equipment to optimize the effectiveness of interventions:

- First Aid cabinet with all necessary essentials
- First Aid Kits in all vehicles and at all construction sites
- Communication Equipment at all sites for use in case of an emergency

2. Instructions

- Eliminate the risk and comfort the victim
- Only attempt moving the victim/s if the risk is still present and movement will worsen their conditions
- Do not provide drinking water to victims
- Cover all victims
- Remain calm and avoid overreacting, seek refuge in quiet and well-ventilated place.

3. Rescuers

- Rescuers working on the construction site must be able to administer first aid and, if possible, stabilize the victims before they are transferred to the hospital or clinic.

The ESHS officer coordinates administrative and documentary follow-up of each accident in accordance with the ESMPCS.

Cases, like Political incidents, riots, attack, and wars special instruction may be required depending on local circumstance and should be provided to the contractor and staff by FIOHTG.

Periodic Verifications of medical kits and emergency equipment together with emergency and alert exercises are to carry out at least once every year.

Annex K: STAFF REGISTER

	Surname, First Name	Gender	Type of Work	Time In	Time Out	Signature
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						

	Surname, First Name	Gender	Type of Work	Time In	Time Out	Signature
17.						
18.						
19.						
20.						
21.						
22.						
23.						
24.						

Annex L: ACCIDENT REPORT SHEET

Type of Worker	Date of the accident and hours worked before accident	Full Name	DETAILS OF THE ACCIDENT				
			<i>Damage (material or physical injury)</i>	<i>Type of injury</i>	<i>Measures immediately taken</i>	<i>Proposed to avoid the occurrence of similar event</i>	AWS, AWNS AWS: Accident resulting to non-stop of work AWNS Accident resulting to stop work
Builders							
Drivers							
Welders							
Supervisors							

Annex M: Safety and Traffic Management

Safety issues are addressed in Health and Safety Plan to ensure safety operations are always in place.

Transportation route for gravel and other materials from subcontractor's quarries to the site is through an existing route. Given the limited volume of materials to be transferred, not much traffic disturbance is expected. The entry and exit routes are existing routes, thus causing no pressure on existing resources and utilities.

Transportation has impacts on dust, which requires the loaded materials to be packed well before delivery. When transporting the materials easy to cause dust or fine powder bulk, sleeve cover or canvas will be used to cover it and the vehicle's speed will be less than 40 km/h. The construction site will be watered during cleaning-up to keep a wet environment to minimize and control dust concentration. The road will be watered regularly to reduce dust caused by vehicles or wind.

Near the location of sensitive receptor, the driver will control the speed of the vehicle and no horn are allowed. Speed less than 40 km / h, and the truck weight shall not exceed 6 tons. Transport time is going to avoid the peak hours, which means it cannot be transported between 8:00 am and 9:00 am, 15:00 to 16:00.

To strictly control the truck's load, to avoid damage caused by overload caused by the road. The Contractor is responsible for monitoring road conditions every day. Once the road has been damaged due to transport, it should be making timely intervention to repair and reduce the truck's carrying capacity and transport frequency.

Annex N: STAKEHOLDER ENGAGEMENT REGISTER

Date	Community	Type of consultation	Duration	Topic	No. of participants (M/F)
02/07/2024	Sare Yerro	xxxxxx	xxxxx	Xxxxx	

Annex O: Codes of Conduct and Action Plan for Implementing ESHS and OHS Standards, and Preventing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

The contractor should develop an adapted action plan to mitigate and respond to SEA/SH. The below is an example of an action plan and relevant Codes of Conduct that should be adapted to the reality of the project and the local Gambian context, and not simply copied and pasted. **The contractor's action plan should clearly outline who should be responsible for each part of the action plan and the budget and cost associated with each action.**

1. Background

The purpose of these *Codes of Conduct and Action Plan for Implementing ESHS and OHS Standards, and Preventing Sexual Exploitation and Abuse and Sexual Harassment* is to introduce a set of key definitions, core Codes of Conduct, and guidelines that:

- i. clearly define obligations on all project staff (including sub-contractors and day workers) with regard to implementing the project's environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements, and;
- ii. help prevent, report and address SEA/SH within the work site and in its immediate surrounding communities.

The application of these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of SEA and SH on the project and in the local communities.

These Codes of Conduct are to be adopted by those working on the project and are meant to:

- i. create awareness of the ESHS and OHS expectations on the project;
- ii. create common awareness about SEA/SH and:
 - (a) ensure a shared understanding that they have no place in the project; and
 - (b) create a clear system for identifying, responding to, and sanctioning SEA/SH incidents.

Ensuring that all project staff understand the values of the project, understand expectations for all employees, and acknowledge the consequences for violations of these values, will help to create smoother, more respectful and productive project implementation thereby helping ensure that the project's objectives will be achieved.

2. Definitions

The following definitions apply:

Environmental, Social, Health and Safety (ESHS): an umbrella term covering issues related to the impact of the project on the environment, communities, and workers.

Occupational Health and Safety (OHS): Occupational health and safety is concerned with protecting the safety, health and welfare of people engaged in work or employment. The enjoyment of these standards at the highest levels is a basic human right that should be accessible by each worker.

Gender-Based Violence (GBV): is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, psychological, or emotional harm or suffering, or denial of economic opportunity or economic deprivation, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. The term GBV is used to underscore the systemic inequality between males and females (which exists in every society in the world) and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women."¹⁰ The six core types of GBV are:

- **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis, other body part, or an object.
- **Sexual Assault:** any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.
 - **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 offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment (e.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts).
 - **Sexual Exploitation:** 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:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Physical Assault:** an act of physical violence that is not sexual in nature. Examples include: hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that *results* in pain, discomfort or injury.
- **Forced Marriage:** the marriage of an individual against her or his will.
- **Denial of Resources, Opportunities or Services:** denial of rightful access to economic resources/assets or livelihood opportunities, education, health or other social services (e.g. a widow prevented from receiving an inheritance, earnings forcibly taken by an intimate

¹⁰ It is important to note that women and girls disproportionately experience violence; overall 35 percent of women worldwide have faced physical or sexual violence (WHO, Global and regional estimates of violence against women: prevalence and health effects of intimate partner violence and non-partner sexual violence, 2013). Some men and boys also face violence based on their gender and unequal power relationships.

partner or family member, a woman prevented from using contraceptives, a girl prevented from attending school, etc.).

- **Psychological / Emotional Abuse:** infliction of mental or emotional pain or injury. Examples include: threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, harassment, unwanted attention, remarks, gestures or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Violence Against Children (VAC): physical, sexual, emotional and/or psychological harm, neglect or negligent treatment of minor children (i.e. under the age of 18), including exposure to such harm,¹¹ that results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This includes using children for profit, labor¹², sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography.

Grooming: behaviors that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualize that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Online Grooming: the act of sending an electronic message with indecent content to a recipient who the sender believes to be a minor, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.¹³

Accountability Measures: measures put in place to ensure the confidentiality of survivors and to hold contractors, consultants, and the client responsible for instituting a fair system of addressing cases of SEA/SH.

Contractors Environmental and Social Management Plan (CESMP): the plan prepared by the contractor outlining how they will implement the works activities in accordance with the project's environmental and social management plan (ESMP).

Child: a term used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

Child Protection (CP): is an activity or initiative designed to protect children from any form of harm, particularly arising from VAC.

Consent: is the informed choice underlying an individual's free and voluntary intention, acceptance, or agreement to do something. 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. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national

¹¹ Exposure to GBV is also considered VAC.

¹² The employment of children must comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labor and minimum age. They must also be able to meet the project's Occupational Health and Safety competency standards.

¹³ For example, the Vanuatu Criminal Code Act 1995, Division 474 (telecommunications offences, subdivision C).

legislation of the country into which the Code of Conduct is introduced has a lower age.¹⁴ Mistaken belief regarding the age of the child and consent from the child is not a defense.

Consultant: is as any firm, company, organization, or other institution that has been awarded a contract to provide consulting services to the project and has hired managers and/or employees to conduct this work.

Contractor: is any firm, company, organization, or other institution that has been awarded a contract to conduct infrastructure development works for the project and has hired managers and/or employees to conduct this work. This also includes sub-contractors hired to undertake activities on behalf of the contractor.

Employee: is any individual offering labor to the contractor or consultant within country on or off the work site, under a formal or informal employment contract or arrangement, typically, but not necessarily (e.g. including unpaid interns and volunteers), in exchange for a salary, with no responsibility to manage or supervise other employees.

SEA/SH Allegation Procedure: is the prescribed procedure to be followed when reporting incidents of SEA/SH.

SEA/SH Codes of Conduct: The Codes of Conduct adopted for the project covering the commitment of the company, and the responsibilities of managers and individuals with regards to SEA/SH.

SEA/SH Compliance Team (SEA/SH CT): a team established by the project to address SEA/SH issues.

Grievance Mechanism (GM): is the process established by a project to receive and address complaints, including the ethical and confidential management of SEA/SH-related claims.

Manager: is any individual offering labor to the contractor or consultant, on or off the work site, under a formal or informal employment contract and in exchange for a salary, with responsibility to control or direct the activities of a contractor's or consultant's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.

Perpetrator: the person(s) who commit(s) or threaten(s) to commit an act or acts of SEA/SH.

Response Protocol: is the mechanisms set in place to respond to cases of SEA/SH (see Section 4.7 Response Protocol).

Survivor/Survivors: the person(s) adversely affected by SEA/SH. Women, men and children can be survivors of GBV; children can be survivors of VAC.

Work Site: is the area in which infrastructure development works are being conducted, as part of the project. Consulting assignments are considered to have the areas in which they are active as their work sites.

¹⁴ For example, under Article 97 Criminal consolidation act for age of legal consent in Vanuatu, sexual activity with any child under the age of 15 years for heterosexual conduct and 18 years for same sex conduct is prohibited (<http://tinyurl.com/vu-consent>). However, the World Bank follows the United Nations for the age of consent (18 years) so this applies on World Bank financed projects.

Work Site Surroundings: is the 'Project Area of Influence' which are any area, urban or rural, directly affected by the project, including all human settlements found on it.

3. Codes of Conduct

This chapter presents three Codes of Conduct for use:

- i. **Company Code of Conduct:** Commits the company to addressing SEA/SH issues;
- ii. **Manager's Code of Conduct:** Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,
- iii. **Individual Code of Conduct:** Code of Conduct for everyone working on the project, including managers.

Company Code of Conduct

Implementing ESHS and OHS Standards

Preventing Sexual Exploitation and Abuse and Sexual Harassment

The company is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment in which SEA/SH have no place, and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

General

1. The company—and therefore all employees, associates, representatives, sub-contractors, and suppliers—commits to complying with all relevant national laws, rules, and regulations.
2. The company commits to full implementing its 'Contractors Environmental and Social Management Plan' (CESMP).
3. The company commits to treating 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. Acts of SEA/SH are in violation of this commitment.
4. The company shall ensure that interactions with local community members are done with respect and non-discrimination. Any sexual relations between site workers / project personnel and local community members should be prohibited in view of imbalanced power dynamics.

5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
6. The company will follow all reasonable work instructions (including regarding environmental and social norms).
7. The company will protect and ensure proper use of property (for example, to prohibit theft, carelessness, or waste).

Health and Safety

8. The company will ensure that the project's occupational health and safety (OHS) Management Plan is effectively implemented by company staff, as well as sub-contractors and suppliers.
9. The company will ensure that all person's on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The company will:
 - i. prohibit the use of alcohol during work activities.
 - ii. prohibit the use of narcotics or other substances which can always impair faculties .
11. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project.

Sexual Exploitation and Abuse and Sexual Harassment

12. Acts of SEA and SH constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate referral to the Police for further action.
13. All forms of GBV, including SEA, SH, and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or within the local community.
 - i. **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 offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment (e.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts).
 - ii. **Sexual Exploitation:** 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.

- iii. **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 14. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- 15. Unless there is full consent¹⁵ by all parties involved in the sexual act, sexual interactions between the company’s employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- 16. In addition to company sanctions, legal prosecution of those who commit acts of SEA/SH will be pursued if appropriate and if the survivor has given her/his informed consent.
- 17. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of SEA/SH by a fellow worker, whether in the same company or not. Reports must be made in accordance with project’s SEA/SH Allegation Procedures.
- 18. Managers are required to report and act to address suspected or actual acts of SEA and SH as they have a responsibility to uphold company commitments and hold their direct reports accountable.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

- 19. All managers sign the project’s ‘Manager’s Code of Conduct’ detailing their responsibilities for implementing the company’s commitments and enforcing the responsibilities in the ‘Individual Code of Conduct’.
- 20. All employees sign the project’s ‘Individual Code of Conduct’ confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in SEA and SH.
- 21. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers’ camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
- 22. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

¹⁵ **Consent** is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. 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. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

23. An appropriate person is nominated as the company's 'Focal Point' for addressing SEA/SH issues, including representing the company on the SEA/SH Compliance Team (SEA/SH CT) which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).
24. Ensuring that an effective SEA/SH Action Plan is developed in consultation with the SEA/SH CT which includes as a minimum:
- i. **SEA/SH Allegation Procedure** to report SEA and SH issues through the project Grievance Mechanism (Section 4.3 Action Plan);
 - ii. **Accountability Measures** to protect confidentiality of all involved (Section 4.4 Action Plan); and,
 - iii. **Response Protocol** applicable to SEA/SH survivors and perpetrators (Section 4.7 Action Plan).
25. That the company effectively implements the agreed final SEA/SH Action Plan, providing feedback to the SEA/SH CT for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's SEA/SH Codes of Conduct.
27. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the SEA/SH Code of Conduct.

I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to SEA and SH. I understand that any action inconsistent with this Company Code of Conduct or failure to act mandated by this Company Code of Conduct may result in disciplinary action.

Company name: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Manager's Code of Conduct

Implementing ESHS and OHS Standards

Preventing Sexual Exploitation and Abuse and Sexual Harassment

Managers at all levels have a responsibility to uphold the company's commitment to implementing the ESHS and OHS standards, and preventing and addressing SEA/SH. This means that managers have an acute responsibility to create and maintain an environment that respects these standards and prevents SEA/SH. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere to this Manager's Code of Conduct and sign the Individual Code of Conduct. This commits them to supporting the implementation of the CESMP and the OHS Management Plan and developing systems that facilitate the implementation of the SEA/SH Action Plan. They need to maintain a safe workplace, as well as a workplace environment and local community free from abuse and harassment. These responsibilities include but are not limited to:

Implementation

1. To ensure maximum effectiveness of the Company and Individual Codes of Conduct:
 - i. Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
 - ii. Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
 - ii. Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager, the GCCT, and the client.
 - iii. Participate in training and ensure that staff also participate as outlined below.
 - iv. Put in place a mechanism for staff to:
 - (a) report concerns on ESHS or OHS compliance; and,
 - (b) confidentially report SEA/SH incidents through the Grievance Mechanism (GM)
 - v. Staff are encouraged to report suspected or actual ESHS, OHS, SEA/SH issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.

4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of SEA/SH from being hired, re-hired, or deployed. Use background and criminal reference checks for all employees.
5. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:
 - i. Incorporate the ESHS, OHS, SEA/SH Codes of Conduct as an attachment.
 - ii. Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.
 - iii. Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against SEA/SH, to investigate allegations thereof, or to take corrective actions when SEA/SH has occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.
6. Provide support and resources to the SEA/SH CT to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the SEA/SH Action Plan.
7. Ensure that any SEA/SH issue warranting Police action is reported to the Police, the client, and the World Bank immediately, only upon informed consent by the survivor to make these reports.
8. Report and act according to the response protocol (Section 4.7 Response Protocol) any suspected or actual acts of SEA/SH as managers have a responsibility to uphold company commitments and hold their direct reports responsible.
9. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately.

Training

10. The managers are responsible to:
 - i. Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
 - ii. Ensure that staff have a suitable understanding of the CESMP and are trained as appropriate to implement the CESMP requirements.
11. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the SEA/SH elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the SEA/SH Action Plan for addressing SEA/SH issues.

12. Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations, including collecting satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.
13. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
 - i. OHS and ESHS; and,
 - ii. SEA/SH required of all employees.
14. During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees to combat increased risk of SEA/SH.

Response

15. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.
16. With regard to SEA/SH:
 - i. Provide input to the SEA/SH Allegation Procedures (Section 4.2 Action Plan) and Response Protocol (Section 4.7 Action Plan) developed by the SEA/SH CT as part of the final cleared SEA/SH Action Plan.
 - ii. Once adopted by the Company, managers will uphold the Accountability Measures (Section 4.4 Action Plan) set forth in the SEA/SH Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of SEA/SH (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
 - iii. If a manager develops concerns or suspicions regarding any form of SEA/SH by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GM.
 - iv. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made
 - v. If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the respective company and the SEA/SH CT. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.
 - vi. Ensure that any SEA/SH issue warranting Police action is reported to the Police, the client and the World Bank immediately, only upon informed consent by the survivor to do so.

17. Managers failing address ESHS or OHS incidents or failing to report or comply with the SEA/SH provisions may be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:

- i. Informal warning.
- ii. Formal warning.
- iii. Additional Training.
- iv. Loss of up to one week's salary.
- v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- vi. Termination of employment.

18. Ultimately, failure to effectively respond to ESHS, OHS, SEA/SH cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH requirements. I understand that any action inconsistent with this Manager's Code of Conduct or failure to act mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Individual Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence Against Children

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing SEA and SH, is important.

The company considers that failure to follow ESHS and OHS standards, or to partake in SEA/SH activities—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit SEA/SH may be pursued if appropriate and if the survivor has given his /her informed consent.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, SEA/SH as requested by my employer.
2. Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
3. Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
6. Consent to Police background check.
7. 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.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).

10. Not engage in sexual exploitation and abuse — 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 ; abuse is defined as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
11. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
12. Unless there is the full consent¹⁶ by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
13. Consider reporting through the GM or to my manager any suspected or actual SEA/SH by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

14. Wherever possible, ensure that another adult is present when working in the proximity of children.
15. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
16. Not use any computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
17. Refrain from physical punishment or discipline of children.
18. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
19. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
20. Take appropriate caution when photographing or filming children (See Annex 2 for details).

¹⁶ **Consent** is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance, or agreement to do something. 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. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defence.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

21. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
22. 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.
23. Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
24. Ensure images are honest representations of the context and the facts.
25. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer may take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted and if consented to by the survivor.

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. That I will avoid actions or behaviors that could be construed as GBV or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

4. SEA/SH Action Plan

4.1 The SEA/SH Compliance Team

The project shall establish a '**SEA/SH** Compliance Team' (SEA/SH CT). The SEA/SH CT will include, as appropriate to the project, at least four representatives ('Focal Points') as follows:

- i. A safeguards specialist from the client;
- ii. The occupational health and safety manager from the contractor¹⁷, or someone else tasked with the responsibility for addressing SEA/SH with the time and seniority to devote to the position;
- iii. The supervision consultant; and,
- iv. A representative from a local service provider with experience in SEA/SH (the 'Service Provider').

It will be the duty of the **SEA/SH** CT with support from the management of the contractor to inform workers about the activities and responsibilities of the **SEA/SH** CT. To effectively serve on the **SEA/SH** CT, members must undergo training by the local service provider prior to the commencement of their assignment to ensure that they are sensitized on GBV and Child Protection, including SEA/SH.

The SEA/SH CT will be required to:

- i. Approve any changes to the **SEA/SH Codes of Conduct** contained in this document, with clearances from the World Bank for any such changes.
- ii. Prepare the **SEA/SH Action Plan** reflecting the Codes of Conduct which includes:
 - (a) **SEA/SH Allegation Procedures** (See 4.2)
 - (b) **Accountability Measures** (See 4.4)
 - (c) An **Awareness raising Strategy** (See 4.6)
 - (d) A **Response Protocol** (See 4.7)
- iii. Obtain approval of the SEA/SH Action Plan by the contractor's management;

¹⁷ Where there are multiple contractors working on the project, each shall nominate a representative as appropriate.

- iv. Obtain client and World Bank clearances for the SEA/SH Action Plan prior to full mobilization;
- v. Receive and monitor resolutions and sanctions regarding complaints received related to SEA/SH associated with the project; and,
- vi. Ensure that SEA/SH statistics in the GM are up to date and included in the regular project reports.

The SEA/SH CT shall hold quarterly update meetings to discuss ways to strengthen resources and SEA/SH support for employees and community members.

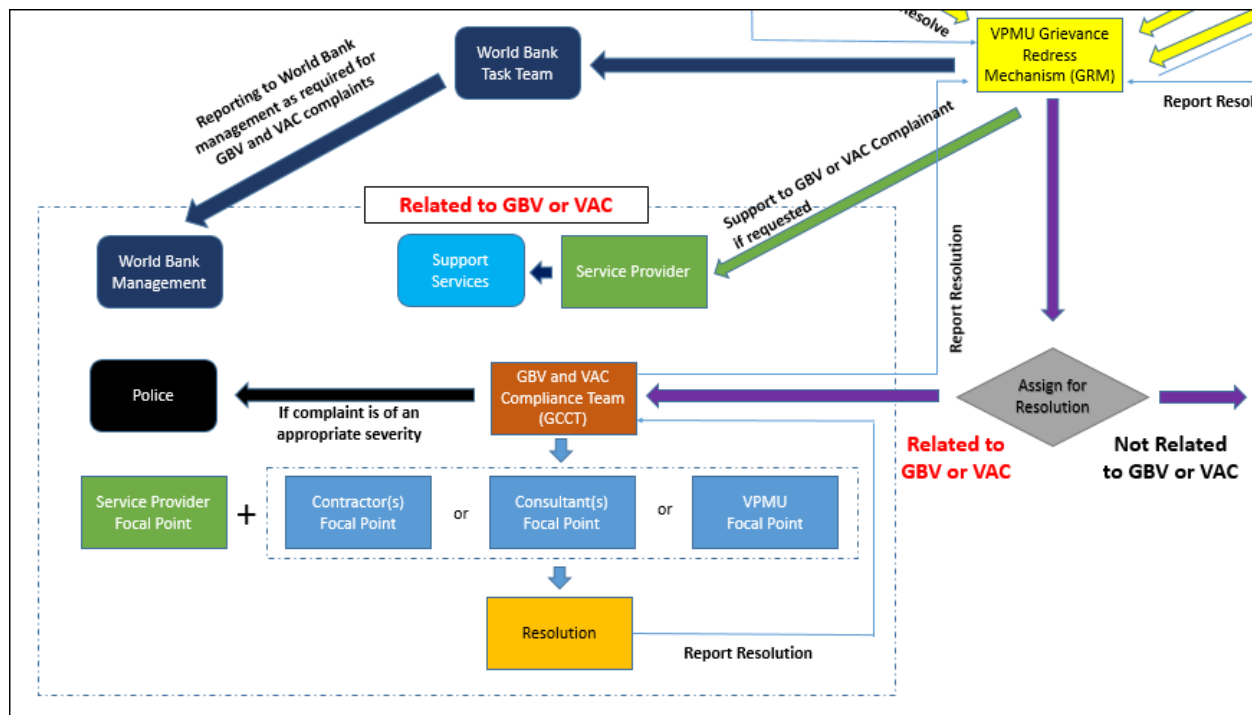
4.2 Making Complaints: SEA/SH Allegation Procedures

All staff, volunteers, consultants, and sub-contractors are encouraged to report suspected or actual SEA/SH cases. Managers are required to report suspected or actual SEA/SH cases as they have responsibilities to uphold company commitments and they hold their direct reports accountable for complying with the Individual Code of Conduct.

The project will provide information to employees and the community on how to report cases of SEA/SH Code of Conduct breaches through the Grievance Mechanism (GM). The SEA/SH CT will follow up on cases of SEA/SH and Code of Conduct breaches reported through the GM.

4.3 Addressing Complaints about SEA/SH

The figure below shows the process for addressing complaints based on the example of the Vanuatu Aviation Investment Project (VAIP).



Note: VPMU is the Vanuatu Project Management Unit (VPMU) responsible for the implementation of VAIP.

GM

The project operates a grievance redress mechanism (GM) which is managed by a designated GM operator with the project management unit. Reports of SEA/SH, other complaints, or other concerns may be submitted online, via telephone or mail, or in person.

All complaints regarding SEA/SH must immediately be reported to the World Bank task team by the GM operator.

The GM operator will refer complaints related to SEA/SH to the SEA/SH CT to resolve them. In accordance with the SEA/SH Action Plan, the SEA/SH CT through the Service Provider and Focal Point(s) will verify the complaint and ultimately provide the GM operator with a resolution to the complaint, or the Police if necessary and only upon informed consent by the survivor. The survivor's confidentiality should also be assured when reporting any incidences to the Police.

The GM operator will, upon resolution, advise the complainant of the outcome, unless it was made anonymously. Complaints made to managers or the Service Provider will be referred by them to the GM for processing.

If the complaint to the GM is made by a survivor or on behalf of a survivor, the complainant will be directly referred to the service provider to receive support services while the SEA/SH CT investigates the complaint in parallel.

Service Provider

The Service Provider is a local organization which has the experience and ability to support survivors of SEA/SH. The client, the contractor(s) and consultant must establish a working relationship with the Service Provider, so that SEA/SH cases can safely be referred to them. The Service Provider will also provide support and guidance to the SEA/SH Focal Points as necessary. The Service Provider will have a representative on the SEA/SH CT and be involved in resolving complaints related to SEA/SH.

SEA/SH CT SEA/SH Focal Points

The SEA/SH CT shall confirm that all complaints related to SEA/SH have been referred to the World Bank by the GM operator.

The SEA/SH CT shall consider all SEA/SH complaints and agree on a plan for resolution. The appropriate Focal Point will be tasked with implementing the plan (i.e. issues with contractor's staff will be for the contractor to resolve; consultant's staff the consultant; and client staff the client). The Focal Point will advise the SEA/SH CT on resolution, including referral to the Police if necessary, and only upon informed consent by the survivor. They will be assisted by the Service Provider as appropriate.

All the Focal Points on the SEA/SH CT must be trained and empowered to resolve SEA/SH issues. It is essential that all staff of the GM and SEA/SH CT understand the guiding principles and ethical requirement of dealing with survivors of SEA/SH. All reports should be kept confidential and referred immediately to the Service Provider represented on the SEA/SH CT¹⁸. In SEA/SH cases

¹⁸ Survivors of SEA/SH may need access to Police, justice, health, psychosocial, safe shelter and livelihood services to begin on a path of healing from their experience of violence.

warranting Police action, for which the survivor's informed consent has also been obtained, the Focal Points must appropriately refer the complaint to: (i) the authorities; (ii) the Service Provider; and, (iii) management for further action. The client and the World Bank are to be immediately notified.

4.4 Accountability Measures

All reports of SEA/SH shall be handled in a confidential manner to protect the rights of all involved. The client, contractor and consultant must maintain the confidentiality of employees who notify any acts or threats of violence, and of any employees accused of engaging in any acts or threats of violence (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law). The contractor and consultant must prohibit discrimination or adverse action against an employee because of a survivor's disclosure, experience or perceived experience of SEA/SH (see Annex 1 for examples of actions to maintain accountability).

To ensure that survivors feel confident to disclose their experience of SEA/SH, they can report cases of SEA/SH through multiple channels: (i) online, (ii) phone, (iii) in-person, (iv) the local service provider, (v) the manager(s), (vi) village councils, (vii) the Police, or (viii) any other channel through which a survivor feels comfortable reporting an incident of SEA/SH. To ensure confidentiality, only the service provider will be privy to identifying information regarding the survivor. The SEA/SH CT will be the primary point of contact for information and follow up regarding the perpetrator.

4.5 Monitoring and Evaluation

The SEA/SH CT must monitor the follow up of cases that have been reported and maintain all reported cases in a confidential and secure location. Monitoring must collect the number of cases that have been reported and the share of them that are being managed by Police, NGOs etc.

These statistics shall be reported to the GM and the Supervision Engineer for inclusion in their reporting.

For any SEA/SH cases warranting Police action, and for which informed consent by the survivor has been obtained, the client and the World Bank are to be immediately notified.

4.6 Awareness-raising Strategy

It is important to create an Awareness-raising Strategy with activities aimed to sensitize employees on SEA/SH on the work site and its related risks, provisions of the SEA/SH Codes of Conduct, SEA/SH Allegation Procedures, Accountability Measures and Response Protocol. The strategy will be accompanied by a timeline, indicating the various sensitization activities through which the strategy will be implemented and the related (expected) delivery dates. Awareness-raising activities should be linked with trainings provided by the GBV Service Provider.

4.7 Response Protocol

The SEA/SH CT will be responsible for developing a written response¹⁹ protocol to meet the project requirements, in accordance with national laws and protocols. The response protocol must include mechanisms to notify and respond to perpetrators in the workplace (See 4.9 for Perpetrator Policy and Response). The response protocol will include the GM process as well as information about service referrals to ensure competent and confidential response to disclosures of SEA/SH. An employee who discloses a case of SEA/SH in the workplace shall be referred to the GM for reporting, upon informed consent by the employee in question.

4.8 Survivor Support Measures

It is essential to appropriately respond to the survivor's complaint by respecting the survivor's choices to minimize the potential for re-traumatization and further violence against the survivor. Refer the survivor to the GBV Service Provider to obtain appropriate support services in the community—including medical and psychosocial support, emergency accommodation, security including Police protection and livelihood support—by facilitating contact and coordination with these services. The client, contractor or consultant may, where feasible, provide financial and other support to survivors of SEA/SH for these services (see Annex 1 for examples of financial support).

If the survivor is an employee, to ensure the safety of the survivor, and the workplace in general, the client, contractor or consultant, in consultation with the survivor, will assess the risk of ongoing abuse to the survivor and in the workplace. Reasonable adjustments will be made to the survivor's work schedule and work environment as deemed necessary (see Annex 1 for examples of safety measures). The employer will provide adequate leave to survivors seeking services after experiencing violence (see Annex 1 for details).

4.9 Perpetrator Policy and Response

Encourage and accept notification through the GM from employees and community members about perpetrators in the workplace. Through the SEA/SH CT and/or the GBV Service Provider, oversee the investigation of these grievances, ensuring procedural fairness for the accused, and within the local laws. If an employee has breached the Code of Conduct, the employer will act which could include:

- i. Undertake disciplinary action up in accordance with sanctions in the SEA/SH Codes of Conduct;
- ii. Report the perpetrator to the Police as per local legal paradigms; and/or
- iii. If feasible, provide or facilitate counselling for the perpetrator.

5.0 Sanctions

In accordance with the Code of Conduct, any employee confirmed as an SEA/SH perpetrator shall be considered for disciplinary measures in line with sanctions and practices as agreed in the Individual Code of Conduct (see Annex 1 for examples of sanctions). It is important to note that,

¹⁹ Develop appropriate protocol for written recording of SEA/SH incidents raised in case the notes are subpoenaed. Develop processes for record keeping including activities undertaken by the SEA/SH CT.

for each case, disciplinary sanctions are intended to be part of a process that is entirely internal to the employer, is placed under the full control and responsibility of its managers, and is conducted in accordance with the applicable national labor legislation.

Such process is expected to be fully independent from any official investigation that competent authorities (e.g. Police) may decide to conduct in relationship to the same case, and in accordance with the applicable national law. Similarly, internal disciplinary measures that the employer's managers may decide to enact are meant to be separate from any charges or sanctions that the official investigation may result into (e.g. monetary fines, detention etc.).

Codes of Conduct Annex 1 - Potential Procedures for Addressing SEA/SH

Accountability Measures to maintain confidentiality can be achieved through the following actions:

1. Inform all employees that confidentiality of SEA/SH survivors' personal information is of utmost importance.
2. Provide the SEA/SH CT with training on empathetic and non-judgmental listening as well as guiding principles of survivor care.
3. Take disciplinary action, including and up to dismissal, against those who breach survivor's confidentiality (this is unless a breach of confidentiality is necessary to protect the survivor or another person from serious harm, or where required by law).

SEA/SH Allegation Procedures should specify:

1. From whom survivors can seek information and assistance.
2. The process for community members and employees to lodge a complaint through the GM should there be alleged SEA/SH.
3. The mechanism for how community members and employees can escalate a request for support or notification of violence if the process for reporting is ineffective due to unavailability or non-responsiveness, or if the employee's concern is not resolved.

Financial and Other Supports to survivors can include:

1. Coverage of all medical, psychological, and legal costs related specifically to the incident.
2. Providing or facilitating access to childcare.
3. Providing security upgrades to the employee's home or temporary housing.
4. Providing safe transportation to access support services or to and from accommodation.

Based on the rights, needs and wishes of the survivor, survivor support measures to ensure the safety of the survivor who is an employee can include²⁰:

1. Changing the alleged perpetrator or survivor's span of hours or pattern of hours and/or shift patterns.
2. Redesigning or changing the alleged perpetrator or survivor's duties.
3. Changing the survivor's telephone number or email address to avoid harassing contact.
4. Relocating the survivor or alleged perpetrator to another work site/ alternative premises.
5. Providing safe transportation to and from work for a specified period.

²⁰ It is critical that a survivor centered approach be adopted. The survivor should be fully involved in the decision making. Except for exceptional circumstances the perpetrator should be required to take appropriate actions to accommodate the survivor (e.g. move, change hours, etc.), rather than the survivor changing.

6. Supporting the survivor to apply for an Interim Protection Order or referring them to appropriate support.
7. Taking any other appropriate measures including those available under existing provisions for family friendly and flexible work arrangements.

Leave options for survivors that are employees can include:

1. An employee experiencing SEA/SH should be able to request paid special leave to attend medical or psychosocial appointments, legal proceedings, relocation to safe accommodation and other activities related to SEA/SH.
2. An employee who supports a person experiencing SEA/SH may take caregivers leave, including but not limited to accompanying them to court or hospital, or to take care of children.
3. Employees who are employed in a casual capacity may request unpaid special leave or unpaid care givers leave to undertake the activities described above.
4. The amount of leave provided will be determine by the individual's situation through consultations with the employee, the management, and the SEA/SH CT where appropriate.

Potential Sanctions to employees who are alleged perpetrators of SEA/SH include:

1. Informal warning
2. Formal warning
3. Additional Training
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.

Referral to the Police or other authorities as warranted and upon informed consent by the survivor.

Annex P: Risk Analysis

Risk Analysis

			GRAVITY			
			B	C	D	E
PROBABILITY / FREQUENCY	Very likely / occurs annually	5	B5	C5	D5	E5
	Likely / occurs every 2-3 years	4	B4	C4	D4	E4
	Possible / occurs every 5 years	3	B3	C3	D3	E3
	Low possibility / occurs every 10 years	2	B2	C2	D2	E2
	Not possible / never happened in 20 years	1	B1	C1	D1	E1

	Risk prohibited, requires immediate action
	Medium risk, actions to be scheduled
	Tolerable risk, no action required

P: probability

S: Severity

R: Result

Evaluation of the risk $R=P+S$

Operations found during the activities of civil engineering works

1. Ground Preparation (Brush cutting, Cleaning)
2. (Preparation excavation for foundations)
3. Reinforcement

4. Formwork/Stripping
5. Work at height
6. Vehicle traffic
7. Securing activities

3. Reinforcement						
<i>Intervention</i>	<i>Hazard</i>	<i>Risk</i>	<i>P</i>	<i>S</i>	<i>R</i>	<i>Mitigation measure</i>
Storage	Accumulation of irons and pending works	Bodily Injury	3	C	C3	Mark the area and the pending irons Organize the storage area
Cutting	Handling of tools	Bodily Injury	3	D	D3	Wearing PPE (gloves ...)
	Presence of falling iron		3	C	C3	Organize and tidy up the cutting area
Finishing	Handling of tools	Bodily Injury	3	C	C3	Wearing PPE (gloves ...)
Reinforcement	Handling of iron	Musculoskeletal issues	3	C	C3	Create suitable work plans
		Bodily Injury	3	C	C3	Wearing PPE (gloves ...)
	Presence of falling iron		3	C	C3	Organize and tidy up the reinforcement area
	Presence of falling iron		3	C	C3	Mark pending iron
	Handling of tools	Bodily Injury	3	D	D3	Wearing PPE (gloves, full face shield, hearing protection ...)
	Presence of falling iron		3	C	C3	Organize and tidy up the grinding area
Grinding	Glowing particles	Burns	3	D	D3	Wheel compliance
		Fire	2	E	E2	Presence of fire extinguisher
	Noise	Noise pollution	4	B	B4	Wearing PPE (gloves, full face shield, hearing protection ...)

4. Formwork/Stripping

<i>Intervention</i>	<i>Hazard</i>	<i>Risk</i>	<i>P</i>	<i>S</i>	<i>R</i>	<i>Mitigation measure</i>
Storage	Accumulation of wood and nails pending	<u>Bodily injuries</u>	3	C	C3	Mark the area
						Organize and organize the storage area
Sawing	Handling the saw	<u>Bodily injuries</u>	3	C	C3	Wearing PPE (gloves, masks, glasses.)
	Dust generation	<u>Health problems</u>	4	D	D4	Organize and organize the sawing area
	Presence of scrap wood	<u>Falls and bodily injuries</u>	3	C	C3	
Formwork/Stripping	Wood handling	<u>Musculoskeletal issues</u>	3	C	C3	Organize and organize the Formwork/Stripping area
		<u>Bodily injuries</u>	3	C	C3	
	Wood handling	<u>Bodily injuries</u>	3	C	C3	Wearing PPE (gloves...)
	Handling of wood treatment products, falling objects ...	<u>Health problems</u>	3	E	E3	Lire les FDS
		Pollution, Suffocation	3	D	D3	Wearing PPE (gloves, masks, glasses.)
						Wearing PPE (gloves, masks, glasses.)
						Presence Product Safety Data Sheet

5. Work at height

<i>Intervention</i>	<i>Hazard</i>	<i>Risk</i>	<i>P</i>	<i>S</i>	<i>R</i>	<i>Mitigation measure</i>
Work at height	<u>Untrained staff</u>	<u>Material / Bodily injury</u>	4	D	D4	Recruit qualified staff to carry out the work
	<u>Use of non-compliant Collective Protection</u>					Use compliant equipment and make sure it is checked before starting activities

5. Work at height

<i>Intervention</i>	<i>Hazard</i>	<i>Risk</i>	<i>P</i>	<i>S</i>	<i>R</i>	<i>Mitigation measure</i>
	<u>Equipment (ladders, scaffolding)</u>					Ensure the induction of workers and their periodic awareness
	<u>Lack of awareness</u>					

6. Vehicle Traffic

<i>Intervention</i>	<i>Hazard</i>	<i>Risk</i>	<i>P</i>	<i>S</i>	<i>R</i>	<i>Mitigation measure</i>
Vehicle Traffic	<u>Proximity to village concessions</u>	<u>Material / Bodily injury</u>	4	D	D4	<ul style="list-style-type: none"> - Adequate signage - Limitation of traffic speed - Raising awareness of project residents
	<u>Non-trained drivers</u>					Recruit qualified drivers
	<u>Technical vehicle failure</u>					Monitoring and maintenance of vehicles

7. Securing activities

<i>Intervention</i>	<i>Hazard</i>	<i>Risk</i>	<i>P</i>	<i>S</i>	<i>R</i>	<i>Mitigation measure</i>
Securing activities	<u>Physical assaults (thieves, animals)</u> <u>Third party intrusion</u>	<u>Material / Bodily injury</u>	3	D	D3	<ul style="list-style-type: none"> - Adequate signage - Provide permanent security