

# Productive Safety Net for socioeconomic Opportunities Project (SNSOP)

Occupational Health and Safety Management Plan (OHSMP)

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# LIST OF ACRONYMS

AC	Appeals committee			
BSAFE	Basic Security Approach in the Field Environment			
CST	Community supervisory Team			
CSM	complementary social measures			
DIS	Direct Income Support			
ECD	Early Childhood Development			
EHSG	Environmental Health and Safety Guidelines			
<b>ESMP</b>	Environmental and social Management Plan			
FSP	Financial services provider			
FSA	Field Security Adviser			
GRM	Grievances Redress Mechanism			
GBV	Gender Based Violence			
H&S	Health and Safety			
HSSE	Health, Safety, Social and Environmental			
HIV	Human Immunodeficiency Virus			
IEC	Information Education and communication			
IP	Implementing Partner			
LIPW	Labour Intensive Public Works			
MAFS	Ministry of Agriculture and Food security			
NGO	Non-Governmental Organization			
OHS	Occupational Health and Safety			
PSEA	Prevention of Sexual Exploitation and Abuse			
QE	Quality Engineer			
SNSOP	Safety Net for Socio-Economic Opportunities Project			
SSSNP	South Sudan Safety Net Project			
SPCU	Single Project Coordination Unit			
SRA	Security Risks Assessment			
SA	Social Assessment			
SBCC	Social and Behavioural Change Communication			
UNOPS	United Nation Office for Project service			
WASH	Water Sanitation and Hygiene			

# **DEFINITION OF KEY TERMS**

Health	A complete physical, mental and social well-being of a person and not merely the absence of disease or infirmity
Safety	The protection of people from physical injury and illness and the environmental damage
Occupation	An activity or profession which a person is devoted to regularly for his/her livelihood
Hazard	Something with the potential to cause harm. e.g., substances, plant or machines, working without PPEs
Risk	The likelihood or possibility of potential harm from a hazard to occur or being realised.
Avoidable	Are risks or hazards that can be eliminated or prevented by removal, or not exposing
risks	the workers to.
Residual	Are the risks or dangers which persist or remain or occur even after control measures
risks	have been applied.
Accident	Is the occurrence of unintended or unexpected incident that resulted to injuries of
	people or damage to properties or environment
Incident	Any unplanned or undesirable event that results in injury or ill-health of people,
	damage/loss of property, materials or the environment and business opportunity
Near	Any incident or occurrence that could have, in slightly different circumstances,
Misses	resulted in an accident
First aid	Immediate medical care or support given to someone with injuries or sudden sickness, usually done onsite where that happens
Inspection	Act of scrutiny of or carefully looking at something for correctness or being placed in right position or done rightly
Work norms	Guiding principles for a particular group of people/beneficiaries or community
mitigation	Act of reducing the severity of harm or reducing its negative effect on people or on the environment
Induction	A process of introducing workers/employees, community(beneficiaries), visitors to new thing or new way of doing something.
Emergency	A sudden unexpected serious situation or condition that requires immediate action or rescue.

#### 1.0 Introduction

#### 1.1 PROJECT BACKGROUND AND SCOPE

The Productive Safety Net for socioeconomic Opportunities (SNSOP) is a World Bank funded project aimed at providing cash transfers and access to income generating opportunities and strengthening the National Safety Net Delivery System. It also aims to expand the safety net interventions to larger geographical locations to provide support to poor and vulnerable households (HH). The project will be implemented in 15 counties. 10 of which are South Sudan safety Net (SSSNP) locations and 5 new locations for a duration of 27 months. This project has 4 components.

Component 1: Cash Transfers and Complementary Social Measures. Under this component, the project provides 15 months of cash assistance to poor and vulnerable households in selected counties to meet immediate consumption gaps while also supporting resilience building to withstand future natural shocks and promoting improved households' awareness and investment in human capital growth. The cash assistance will be provided through two modalities: (i) Labor-Intensive Public Works (LIPW) or participation in behavioural change communications training; and (ii) Direct Income Support (DIS). The complementary social measures under this component aim to promote human capital development through the design and implementation of a mix of Social and Behavioural Change Communication (SBCC) interventions on Financial Literacy (FL), Water, Sanitation, and Hygiene (WASH), Nutrition, and Early Childhood Development (ECD). The target group for these measures, whether LIPW and/or DIS beneficiaries, as well as whether they apply to all counties or selected counties, depends on the specific types of interventions under each measure.

Component 2: Provision of Economic Opportunities implements measures aimed at enhancing economic opportunities of poor and vulnerable youth to support them to become productive citizens of South Sudan.

Component 3: Strengthens Institutional Capacity and Social Protection System and strengthening of the safety net delivery system to serve as the foundation of an eventual government-led national safety net program in South Sudan. 8 Component

Component 4: Project Management, Monitoring and Evaluation, and Knowledge Generation supports day-to-day project management, monitoring, and coordination, as well as broader knowledge generation. To mitigate and respond to work-related risks arising from the implementation of the project components, particularly focusing on LIPWs and economic opportunities related activities, an Occupational Health and Safety Management Plan (hereafter "the OHS Plan") has been established. This plan aims to prevent injuries, infections, or damage to properties or the environment. Additionally, it is designed to prepare for and respond to emergencies effectively, while implementing health and safety measures that minimize risks to health, safety, and the environment.

#### 1.2 Introduction to Health and Safety

This OHS Plan has been designed to assist the management of activities and support a risk-based approach to preventing dangerous acts that could lead to injuries or illnesses or serious incidents in the workplace. This OHS Plan is applicable to all Single Project Coordination Unit (SPCU) staff, implementing partners, contractors, and beneficiaries under the SNSOP. This will be consistent with the scope and duration of the project, South Sudan OHS regulatory requirements, subproject ESMP, and the World Bank General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety. This Plan is a living document that will be used under SNSOP and will be updated annually if required.

#### 1.3 OBJECTIVES OF THE OHS

- The OHS plan aims to ensure and maintain a healthy and safe work environment for all project beneficiaries, committees, SPCU staff, implementing partners, contractors involved and the respective communities through induction, continuous awareness and implementation of risks mitigation measures.
- It also provides emergency preparedness, prevention and response arrangements to emergency situations including, but not limited to workplace accidents; injuries or illnesses; disease outbreak; flooding; fire outbreak; labour unrest and insecurity.

#### 1.4 ACTIVITIES TO BE IMPLEMENTED UNDER THE OHS PLAN

- 1. Ensure local laws and regulations are understood and fully considered within the OH&S Plan:
- 2. Ensure planned review dates and implementation of the OH&S plan are monitored and achieved;
- 3. Timely staff trainings conducted on health and safety;
- 4. Convene Design Phase Start Up Meeting and assign H&S responsibilities;
- 5. Eliminate foreseeable health and safety risks through engineering design solutions and, where that is not possible, take steps to reduce or control those risks;
- 6. Carry out risks assessment and hazards identification with mitigation or control measures within the design, and where appropriate inform key stakeholders/work package contractors;
- 7. Ensure regular coordination of safety issues and provision of safety gears (PPEs) to the sites:
- 8. Check that design changes which affect H&S are recognised and assessed prior to implementation phase;
- 9. Effectively supervise and monitor implementation of H&S risks mitigation measures;
- 10. Ensure effective arrangements in place for regular security and access to the site;
- 11. Ensure timely Site induction and safety briefing or awareness raising;
- 12. Ensure that first aiders are regularly available with first aid kits on site;
- 13. Ensure accidents/incidents are timely reported; acted upon, reviewed and appropriately closed;
- 14. Ensure that Fire and evacuation procedures are established and communicated on site.

#### 1.5. ROLES AND RESPONSIBILITIES

While the SPCU holds the overall responsibility to ensure all tasks related to Health and Safety management in the Project are correctly and timely executed, the respective implementing partners will ensure all related tasks are rightly done on site. The table below clearly stipulates the respective role IPs, SPCU, Contractors and on-ground committees on health and safety

Table 1 - RACI Table

ACTIVITY/Role	IP	SPCU	World Bank	Contractor	Community Supervision Team BDC/BAC
Ensure that local laws and regulations are fully considered within the project design and in H&S Plan	R	A	С	R*	I
Ensure planned review dates and implementation of the OH&S plan are monitored and achieved;	A	R	С	R*	I
Timely staff trainings conducted on health and safety	R	A	I	R	I
Eliminate foreseeable health and safety risks through engineering design solutions and, where that is not possible, take steps to reduce or control those risks	A	R	С	R*	Ι
Carry out risks assessment and hazards identification with mitigation or control measures within the design, and where appropriate inform key stakeholders/work package contractors	A	R	С	R*	I
Ensure regular coordination of safety issues and provision of safety gears (PPEs) to the sites	R	A	I	R*	I
Check that design changes which affect H&S are recognised and assessed prior to implementation phase	A	R	С	I	I
Effectively supervise and monitor implementation of H&S risks mitigation measures	R	A	I	R	R
Ensure effective arrangements in place for regular security and access to the site	R	A	I	R	R

Ensure timely Site induction and safety	R	A	I	R	I
briefing or awareness raising					
Ensure that first aiders are regularly	R	A	Ι	R*	Ι
available with first aid kits on site;					
Ensure accidents/incidents are timely				Duk	
reported; acted upon, reviewed and	R	A	1	R*	R
appropriately closed					
Ensure that Fire and evacuation procedures	R	A	I	R*	I
are established and communicated on site					

#### key

**A** - Accountable (overall responsibility)

**C** - Consulted (supports, and has the information or capability required)

**I** -Informed (notified but not consulted)

**R**-Responsible (gets the work done)

**R**\*- refers to Work Package responsibility

#### 2.0 POLICY AND LEGAL FRAMEWORK

This OHS management plan was prepared in compliance with South Sudan Labour act 2017, Ministry of labour Occupational safety and Health policy 2022, and in accordance with South Sudan legislation on health and safety. The Project Managers and safeguards team of the implementing partners and contractors will review these laws and regulations every 12 months to ensure compliance, and that there are no changes which may affect this plan.

#### 3.0 Operational planning (for multiple sites)

Health and safety planning is an ongoing process throughout the project period. A staged approach to project/site hazard identification and risk control is a requirement of this plan to ensure continuous identification of hazards or risks and corrective measures put in place immediately.

#### 3.1 HAZARDS IDENTIFICATION

A hazard<sup>1</sup> can be defined as something that has the potential to cause harm, injury or damage to people or property while risk is the likelihood that a worker may be harmed or suffer adverse health effects if exposed to a hazard. Risks associated with the hazards shall be assessed in terms of the likelihood and severity. Hazard management is a fundamental element of an effective workplace health and safety management system. Identifying, assessing and

<sup>&</sup>lt;sup>1</sup> Hazards are classified into (a) *Biological hazards*- includes viruses, bacteria, insects, animals, etc., which can cause adverse health impacts; (b) *Chemical hazards*- hazardous substances that can cause harm and can result in both health and physical impacts, such as skin irritation, respiratory system irritation, blindness, corrosion and explosions; (c) *Physical hazards*-environmental factors that can harm a worker without necessarily touching them, including heights, noise, radiation pressure, heat, cold and vibration; (d) *Ergonomic hazards*-physical factors that can result in musculoskeletal injuries; (e) *Psychosocial hazards*- those that can have an adverse effect on an employee's mental health or wellbeing. For example, sexual harassment, victimization, stress and workplace violence.

controlling workplace hazards and risks will eliminate or reduce the likelihood of their causing harm to employees who could become exposed to them. Workplace hazards arise because of the activities performed, equipment used and the physical and environmental conditions of the workplace. The factors that create hazards can best be controlled by coordinators/managers and employees onsite; therefore, the implementer shall ensure training is provided to all employees and beneficiaries to ensure they have adequate skills and knowledge in hazard identification and control which are key issues in managing and maintaining a health and safe work environment. Thus, OHS hazard identification and control process must be implemented, monitored, and maintained throughout the SNSOP implementation.

Overall, all workers of SNSOP have the right to work in a safe and healthy work environment, via measures which are taken to control and minimize their health and safety hazards and risks. To this effect, the workers have the right to: (a) know about hazards in their workplace and to get information, supervision and instruction to protect their health and safety on the job; (b) participate in identifying and solving workplace health and safety problems either through a health and safety representative or a worker member of a joint health and safety committee; and (c) refuse work that they believe is dangerous to their health and safety or that of any other worker in the workplace. The SNSOP is therefore required to identify, assess, and control workplace hazards and risks to eliminate or reduce the likelihood of causing harm to the workers, including community workers, who may be exposed to these hazards and risks.

#### 3.2 STEPS OF HAZARD IDENTIFICATION IN SNSOP

Hazards are identified during different periods of the project life including before the start of the project (the subproject has not been done before), i.e., during design and implementation periods, when the hazard has been identified, before the start of the interventions, at implementation time, and after implementation time, and after the incidents occurred. It is often more effective and easier to eliminate hazards if risk management approaches used at the planning and design stages.

There are five major internationally accepted steps which are significantly apply for RLLP-II for hazard identification and risk assessment. These include:

#### Step 1: Look for Hazards/Identify hazards/risk factors

Supervise the workplace and look for what could reasonably be expected to cause harm, just concentrating on significant hazards. SNSOP will collect the types of hazards that will occur as a result of the type of subprojects to be implemented at different level. Checklists for subproject risk identification (screening checklists) in the ESMF will be used. Previous accidents and near-miss reports will be reviewed while undertaking hazard identification.

#### Step 2: Decide who might be harmed, and how

- This can include office workers, visitors, cleaners, community workers, and other workers who share the workplace. The PCU at all levels will identify how, where, how much, and which group of workers are subjected to or exposed to hazards and risks. Since the civil works are implemented at micro-watershed level, communities are more subjected for the hazards unless they perform properly.

# Step 3: Evaluate the risks and decide if current precautions are adequate or need improvement

- When considering whether current precautions are adequate also consider if the remaining risk is tolerable or intolerable. If it's intolerable than you need to re-evaluate the precautions and improve until the remaining risk is minimized. After the type of hazards and risks are identified at kebele and offices, precautionary measures planned will be implemented by the PCU accordingly.

#### **Step 4: Record your findings**

- Record the findings of the assessment, this means writing down the significant hazards and conclusions. Project workers at all levels must also be informed of these findings. The PCU will assess and record the hazard and risk types in the workplace that affected the lives, causes injuries, types of injuries occurred and any records relevant to the OHS.

#### Step 5: Review your assessment and revise it if necessary

- When a significant change has been made, update the Risk Assessment as necessary. Do not do this for every trivial change. It's recommended that an annual Risk Assessment is conducted as a minimum to ensure that the project is as up to date as possible.

#### 3.3 RISKS ASSESSMENT

Risk assessment is meant to identify all significant risks and hazards associated with the project tasks or activities. Under SNSOP, this is best done through physical observation onsite, and interviews with on-ground personnel on various tasks and approaches used for handling it as well using experience of similar arrangements. The SPCU identified risks and hazards during project design and provided adequate guidance and tools for risks mitigation measures. SPCU will further guide during implementation of risks mitigation measures through monitoring and supervision in the field as well as implementation review.

Field hazard identification and subsequent risk assessment was conducted by UNOPS quality engineers and HSSE specialist, and assistants, including local stakeholders during social assessment (SA), security risks assessment, and during lessons from implementation of world Bank funded South Sudan Safety Net Project (SSSNP). Prior to work commencement, each subproject will be assessed and screened for any social, health and environmental risks. This process will continue throughout the life of the project. UNOPS shall ensure correct identification of risks and hazards, adequately sensitize beneficiaries and other stakeholders in the work location, and monitor and supervise implementation of correct mitigation measures. The CSTs and group leaders will supervise and monitor the implementation of the works and ensure adherence to recommended Health and Safety guidelines including mitigation measures provided during the assessment.

Project manager of the implementing partner (IP), HSSE team including quality engineers shall ensure that the risk assessments focus on the following outcome:

- All foreseeable risks and hazards within the assessed activity have been identified.
- Risks and hazards have been prioritised by their magnitude (high, medium, or low).
- Adequate control/mitigation measures have been documented for each hazard or risk.
- Both routine (regular occurring) and non-routine (irregular or rarely occurring) conditions have been considered.

Before implementation of identified subprojects, screening will be undertaken on environmental and social risks including identifying associated health and safety issues arising because of the subproject implementation. This will also be done prior to activity implementation (for specialized NGOs) which will be reviewed by the respective management of IPs and accepted or approved by SPCU public works and environmental specialist prior to works commencement in order to mitigate various risks during implementation. The beneficiary workforce and stakeholders shall be briefed on the contents of the risk assessment(s) and appropriate mitigation measures developed prior to works commencing; The Risk Assessment(s) will be amended as necessary to ensure that the works progress in a safe manner.

#### 3.4 HIERARCHY OF RISKS AND HAZARDS CONTROL

Having identified all the hazards involved or related to the activities, it is important to select effective control measures. To facilitate this, the hierarchy of risks control have been developed to guide the operation of activities related to SNSOP at all levels. These include:

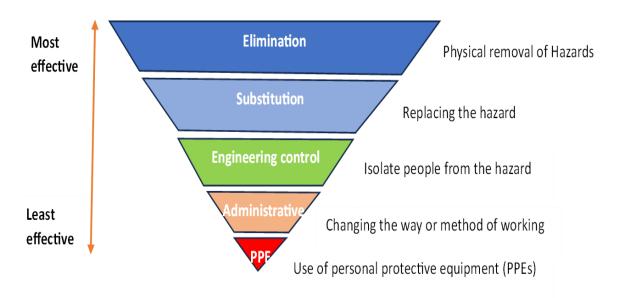
- i) Elimination method-physical or mechanical removal of hazardous substance or materials,
- ii) substitution -replacing hazards with that which does not or causes minimal harm,
- iii) Engineering control -through changing the work design to less risky,
- iv) administrative control -by changing ways of working, reducing work hours, etc),
- V) PPE -effective use of personal protective gears like gumboots, gloves, masks, helmets, ear protectors, etc.

The hierarchy of controls is a method of identifying and ranking safeguards to protect workers from hazards. They are arranged from the most to least effective and include elimination, substitution, engineering controls, administrative controls and personal protective equipment. Often, there may be a need to combine control methods to best protect workers. Elimination makes sure the hazard no longer exists. Examples include a) Ending the use of a hazardous material; b) Doing work at ground level rather than at heights; c) Stopping the use of noisy processes; etc. as needed. Substitution means changing out a material or process to reduce the hazard. Examples include a) Switching to a less hazardous material; b) Switching to a process that uses less force/speed, etc. Administrative controls change the way work is done or give workers more information by providing workers with relevant procedures, training, or warnings. They're often used together with higher-level controls. Personal protective equipment (PPE) includes clothing and devices to protect workers. PPE needs constant effort and attention (including proper use and training) from workers. Higher-level controls aren't always feasible, and PPE might be needed in conjunction with other control measures. (For

details, please refer to https://www.osha.gov/sites/default/files/Hierarchy\_of\_Controls\_02.01.23\_form\_508\_2.pdf).

The diagram below illustrates the 5 stages of the hierarchy of risks control applicable in the project.

**Note:** the types of potential avoidable and residual risks or hazards for this plan are detailed in Appendix A.



#### 4.0 HEALTH AND SAFETY OBJECTIVES AND TARGETS

The project will have the following Health and Safety objectives and targets which are entirely implemented by IPs under the supervision of the SPCU.

Table 2 – Health and safety targets

#	Objective	Target (measurable where practicable)	Action/Program/Resources	Responsible	Cost
1	Monitor health and safety performance	Obtain qualitative OHS data from the 15 project locations and feed into the project Key Performance Indicators, provide reports	1 0 1	SPCU, UNOPS other specialized NGOs	\$ 97560

2	Improve health and safety performance	Ensure that tools and guidance for monitoring OHS management are developed and available e.g. HSSE Checklist, ESMP, reporting templates	<ol> <li>Develop an ESMP and monitor its implementation including timelines, resources, risks mitigation measures and responsibility</li> <li>Use of appropriate PPEs, signages and notices to</li> </ol>	SPCU, UNOPS and other specialized NGOs	\$ 193407
3	Health and safety training and awareness	100% induction for the entire beneficiary workforce and committees prior to commencement of works;  100% induction of all project personnel/staff, Conduct training on GRM, GBV and other safeguards as may be applicable to the subproject implementation.	1. Develop training content, awareness messages and monitor completion rates;  2. IPs staff to cascade health and safety induction and training in the field	UNOPS and other specialized NGOs	\$ 36152
5	Health and safety Culture Change	"Goal Zero" campaign: Maintain zero tolerance for poor HSSE performance across project locations.	Message sharing with respective stakeholders involved in the project through meetings, workshops	SPCU, UNOPS and other NGOs, committees	\$ 44725

#### 4.1 Health and safety management at project sites

Since the Community Supervision Teams (CSTs) may not have the full ability to perform the required health and safety activities on site, UNOPS Quality engineering technicians and HSSE Assistants will support CSTs and beneficiaries in the following areas:

- Risks assessment and hazards identification prior to commencement of work and during of LIPWs activities,
- Carry out inductions and awareness on health and safety and environment, including risks of SEA/GBV with appropriate mitigations,
- First aiding
- Support during emergency situations

- Training on tools management, equipment handling, LIPW subprojects implementation,
- Monitoring implementation of health, safety, and Environmental risks mitigation measures during LIPW activities,
- Receive incidents/accident reports from CST or beneficiaries,
- Providing PPEs to CSTs and beneficiaries for safety, Etc.

Similarly, staff of the specialized NGOs for CSM and economic opportunities will support the beneficiaries in the below areas:

- Risks assessment prior to commencement and during of activities related to CSM and economic empowerment,
- Carry out inductions and awareness on health and safety, including risks of SEA/GBV with appropriate mitigations,
- First aiding when required
- Support during emergency situations
- Receive incidents/accident reports from CST or beneficiaries, etc.

This provision is to ensure that the project fulfils the health and safety requirement of the World Bank and that of the republic of South Sudan. The CSTs shall be trained on the requirement to do a day-to-day field monitoring and supervision with support from the IPs staff on the ground.

#### 5.1 Management of hazardous materials

Occupational diseases may occur because of exposure to hazardous substances in the form of inhaled dust or gaseous particles, ingested materials or skin contact with substances. LIPWs may also subject beneficiaries to injuries, accidents, heat stress, environmental and GBV/SEA risks during work. These potential hazards and risks were identified during social assessment, security Risk Assessment (SRA) and subsequently during subprojects identification and screening, in which appropriate control measures were put in place.

Under SNSOP, the communities will be supported by UNOPS to identify sub projects that do not use or require hazardous materials. Sub-projects will be labour intensive, and the beneficiaries use strictly local hand tools. Should there be a need for other such construction materials and LIPWs tools and equipment containing hazardous substances to be procured by the project, appropriate and specific risk assessment shall be conducted. Further, a plan for the appropriate handling, storage and disposal of such substances shall be developed.

#### 5.2 Access and site security

The UNOPS HSSE Specialist shall ensure that all measures are put in place such as daily security updates, safe working hours, sharing contacts of security focal points, and incidents reporting timeline to establish the sites and for safety. Access to LIPWs site shall be with permission from the CST, and UNOPS staff on-site. All project beneficiaries and committees are responsible to alert the work force on any security issues or violence at site or in the boma/Quarter council that may either or not affect the project implementation in the area. The

IP Project Manager is responsible to ensure that all site security requirements identified in the Risk Assessment for this activity are fully implemented.

#### 5.3 SAFETY RULES DURING PROJECT ACTIVITIES

These Safety rules are meant to keep both project (IPs) staff, CST, beneficiaries, relevant stakeholders, and visitors safe whenever at work sites. These regulations can help prevent and mitigate accidents and minimise risks which in turn support beneficiary and staff wellbeing. These will be emphasized and applied before commencement of respective project activities as follows:

- Labour-intensive public works, and beneficiary payments including light touch messaging. These rules will be outlined on site by either HSSE assistant, quality engineering technician. In their absence, community mobilizers shall brief all participants on the site rules before starting such activities to ensure safety.
- Further, activities relating to Economic Opportunities and Complementary Social Measures (CSM). The staff of these IPs will have to outline relevant rules that apply to their respective activities and associated risks as herein mentioned in different sections of this document to ensure high level of safety.

#### The guiding rules include: -

- o Raise an alarm in case of any emergency,
- o For any emergency including fire outbreak, attack, violence, accident, etc, all people involved at the scene (work site) should assemble at designated areas (location specific) and be directed as per emergency procedures outlined herein below.
- o Timely report accidents and incidents (within 24 hours for class 1 and 48 hours for class 2), and any security threat or violence to the IP staff on the ground
- First Aid kits and Aiders (UNOPS HSSE and quality engineering assistants, CSTs)
  must always be on-site to offer first aiding services in case of any injury and casualty
  and in turn referred to the health facility. UNOPS HSSE, and CST trained on first aid
  will provide the support.
- Exception of visitors with permission, Community members who are nonbeneficiaries nor committee members shall not be allowed to LIPWs site (activity area) to avoid accidents and inconveniences.
- All beneficiaries and CSTs must always wear safety gears (PPEs) such as gumboots, leather/rubber hand gloves, re-washable masks to minimise injuries and infections when on-site.
- Use appropriate tools and equipment for specific LIPWs for safety purposes and quality of work.
- Report faulty or broken hand tools, loss of tools or equipment to Quality engineering technician on site
- o Take responsibility for your personal safety at the work site.
- o Maintain a clean workplace and your personal hygiene.

- o Beneficiaries to observe social (work) distancing when involved in LIPWs
- HSSE assistant, Engineers and CST should ensure Use of barriers or signages, corns and ribbons and reflectors especially working on roads and public facilities to avoid or minimize accidents.
- o Lift or carry objects such as tools and other equipment carefully to minimise injuries.
- o Do not attempt a task alone when you cannot do it.
- o Report any hazard or threat that may appear on workplace
- o Ask for help where necessary.

#### **5.4 Workplace inspections**

Under SNSOP, inspection refers to periodic scrutiny of field activities or intentional field visit to examine performance of specific aspects of health, safety and environment during implementation of project activities. Inspections of tools or equipment and facilities such as stores and children care shelters shall also be undertaken. In this case, inspection will target LIPWs sites and its facilities. UNOPS HSSE assistant will conduct general weekly site inspections. A Minimum of eight (8) inspections are required per month and done once in each site. Reports of the inspections shall be compiled and consolidated into weekly, monthly, and quarterly reports in addition to daily monitoring of health and safety including social and environmental safeguards for effectiveness. Inspections shall be specifically for assessment of the following:

- Site tidiness and cleanliness
- Safe use of equipment and tools
- the use of PPEs by beneficiaries
- Availability of signages/barriers and visible notices placed at work site to prevent entry of vehicles and motorcycles to work areas.
- Beneficiary workload and lifting devices.
- Identify potential Hazards and propose mitigations measures.
- Availability of first aid kits
- Access to water supply/ sanitation facilities
- Effectiveness of Appeals committee (AC) and GBV-focal persons at LIPWs site
- Whether beneficiaries abide by site safety rules and work norms

Inspection reports shall be compiled and shared with UNOPS management, and where necessary it would be escalated to SPCU and World Bank. UNOPS HSSE personnel in the field locations (sites) will be responsible for the assurance of these inspections. The teams are also responsible for ensuring that hazards identified during inspection are corrected in a timely manner and recommendations given to prevent further occurrence.

#### 6.0 Training and Site induction

Employees' training and/or induction on health and safety is key for successful implementation of this plan in the field locations. It is a requirement that employees of the UNOPS, and other IPs undergo such training. For beneficiaries and on-ground stakeholders, on-site induction will be conducted more especially before work starts in a new sub-project and when people and visitors come to the site. Induction and awareness sessions will be on LIPWs site set up, kind of labour and tools required with full demonstration on the work to be done, the use of personal protective equipment (PPEs), sanitation and hygiene, first aiding, and on other risks associated with the implementation of such sub-projects.

Training should consist of basic hazard awareness, site specific hazards, safe work practices, and emergency procedures for fire and other life-threatening risks, evacuation, and natural disaster as appropriate. Any site-specific hazard should be thoroughly reviewed as part of orientation training.

Induction, training and awareness activities under SNSOP have been planned and consideration given to ensuring that project staff, CSTs and beneficiaries doing HSSE critical activities are covered.

Table 3 – Relevant Trainings to be conducted

Type of training	Responsibility	Participants	Frequency	Cost
Basic Field security training	World Bank	All SPCU Staff	Once off over SNSOP duration	\$ 1440
Training on Environmental and social safeguards and screening process, GRM, SEA, OHS	SPCU	IP Staff (HSSE Senior assistants, Quality engineering technicians and Team leaders)	Once over the project period	\$ 33552
General Health and Safety Training (field induction)	UNOPS supported by SPCU	Project Committees and in turn beneficiaries	Quarterly orientation	\$ 00
HSSE Mandatory Online Trainings (PSEA, H&S, BSAFE, I know Gender and HIV in workplace)	UNOPS	All UNOPS staff	Once off over SNSOP duration	\$ 00 (Free online)
First Aid Training	UNOPS	IPs staff (UNOPS and other 2 IPs), CSTs	Once off over SNSOP duration	\$ 33152

WASH, Early childhood Development and Nutrition, financial literacy	UNOPS & NGO for CSM supported by SPCU	ToTs & Project beneficiaries	6 months Minimum	\$ 36000
	SPCU	All IPs staff	Bi-annually	\$ 66304
Training on Grievances Redress Mechanism (including reporting & referrals of GBV cases)	UNOPS supported by SPCU	Project Committees (B/QCAC & B/QCDC)	Quarterly (refresher)	\$ 35425
	UNOPS	All GBV focal points	Quarterly (refresher)	\$ 3375
Training/orientation on handling equipment/tools management, and subproject implementation, awareness on environmental conservation, health and safety	UNOPS quality Engineer and HSSE specialist	CST, Beneficiaries (Field-based)	Quarterly	\$ 00

#### 7.1 EMERGENCY AND EVACUATION PROCEDURES

Emergency procedures are intended to alert everyone on-site, ensure safety and well-being of individuals by addressing or responding to any life-threatening situation such as fire outbreak, strong earthquake, fighting, attacks or conflict, floods, chemical spills, disease outbreak, accident, etc. Some emergencies such as fighting, conflict or attacks or fire (bush burring) and accident may either be caused by beneficiaries or non-beneficiary community. All stakeholders and including beneficiaries will be made aware of the outlined potential emergences plus other locality based (identified by community) emergences then be oriented on how to act or respond accordingly once any occurs.

Note, in response to emergences, relevant stakeholders including government personnel and staff of implementing partners must be involved and Security focal persons. As a minimum, the Emergency procedures shall be boma specific. UNOPS will prepare and roll out boma specific procedure that will be incorporated in to project site-specific inductions session. Prior to any emergency, the workers will be inducted on the following:

- Identified location specific hazards and risks,
- available rescue team from security, local leadership, UNOPS.

- emergency contact numbers to be given to Boma/QCAC on site, and available to field staff. Where possible displayed on information boards over the project work areas and IP field offices.
- Available referral system in the locality
- Beneficiaries must be aware of designated (location specific) assembly area or safe places out of the scene and exit strategy
- Available medical and other support services for the victims,
- Rescue team if available and relevant local government to respond for any emergence.
- Availability of first aiders in case of injuries; emergency procedures are incorporated in the project site inductions briefing.

Emergency procedures shall be periodically reviewed to ensure continued relevance.

#### 7.2 How to respond during emergency

- Immediate notification to rescue personnel; these can be the leadership of the boma and Payam, UNOPS field staff, security focal persons both at the location of scene and UNOPS field security Advisor (FSA) or security focal person for other Specialised NGOs for appropriate quick support.
- Response will depend on the required help, and that can be done through provision of live saving services such as first aid, water; extinguishing fire, transportation to safe locations, medical support if required.
- Assess the scene if safe before responding to an emergency to avoid being a victim
- Need to understand the nature of emergency and possible cause(s) to guide on how to start rescuing and directing people.
- Once in the scene, assess who needs what kind of help including first aiding, transportation, etc.
- Direct people to a safe assembly area and provide additional support where necessary.
- When required provide linkage with other services providers such as medical facilities, and other partners for food and non-food items
- Give appropriate advice to affected people to reduce their emotions, thoughts and anger, where possible, explain the next step to be undertaken to handle the situation.
- Given the nature of emergency and its severity, this needs immediate escalation to the SPCU and to the Bank for appropriate measures.

#### 8.0 COMMUNICATION AND INFORMATION SHARING

#### **8.1 Internal communication and information flow**)

Internally within an Implementing partners, contractors, and relevant institutions, information on health and safety can be communicated as follows:

- Health and safety updates in the weekly project meetings: additional meeting on the same will be organised when needed. Meeting minutes will be distributed to the SNSOP team, and other relevant stakeholders as much as required.

- For LIPWs component, Weekly inspections will be performed jointly by the HSSE senior assistant and the CSTs. The report will be prepared by the IP- HSSE Specialist and shared with the Quality Engineer for necessary actions.
- Toolbox talks is a requirement on regular basis to ensure effective hazards' control
- The Site/office notice board will be used to convey daily updates and information.
- IEC materials to be distributed in the specific project location to create awareness on HSSE and other project matters.
- Monthly or quarterly report: this is a summary of the site weekly inspections report findings and corrective actions.

#### 8.2 EXTERNAL COMMUNICATION

Queries on health and safety management from local communities, journalists, business community, neighbours, local representatives, and any other external parties will be handled according to the following protocol:

- Queries or complaints from members of the public or from project beneficiaries related to the project shall be handled through the established Grievance Redress Mechanism where the complaints can be submitted either through the Appeals Committees established in the Project locations, Group Leaders, CSTs or directly reported to the project staff in the field.
- Queries from external parties including journalists, other stakeholders and institutions will be handled by IP staff including Project Manager, who will address the matter.
   Where necessary, SPCU will be informed of, and further handle or forward to the World Bank accordingly.

#### 8.3 Consultation with the beneficiaries

Arrangements for consulting and coordinating with the beneficiaries participating in LIPWs at site will be as follows:

- Selected representatives of the beneficiaries may participate in the regular and extraordinary meetings between implementing partners (IPs) and the Committees or the CSTs.
- All beneficiaries and community members will be encouraged to raise any suggestions and concerns on health and safety management of the project on an ongoing basis during meetings, briefings, toolbox talks, and through Appeals committee and community leaders.
- The HSSE Assistant in collaboration with the community mobiliser will undertake regular consultation with the beneficiaries and on-ground committees to gain full understanding of the situation on the ground.

#### 9.0 ACCIDENT AND INCIDENT REPORTING

#### 9.1 ACCIDENT AND INCIDENT REPORTING AND INVESTIGATION

All significant accidents or incidents and high potential near misses from the field locations shall first be reported to the IP management that will in turn escalate the same to the SPCU at the Ministry of Agriculture and food security (MAFS), and to the World Bank. For severe incidents (class one), the Bank and SPCU will be notified within 12 - 24 hours and 48 - 72 hours for class two incidents respectively.

A detailed follow up report of the incident will be provided within fifteen (15) days of occurrence of the accident. In the event of an occupational fatality or serious injury, the IP shall report to the MAFS -SPCU for escalation to the Bank as soon as it becomes aware of such incidents. Other relevant government authorities (where necessary) will be informed in accordance with the national incidents reporting requirements (Labour Act 2017, Section 115). Corrective actions shall be implemented in response to project-related incidents or accidents. IP in collaboration with the SPCU will be required to conduct a root cause analysis for designing and implementing further corrective actions.

Accidents/incidents shall be thoroughly investigated, and action taken to prevent recurrence. Reportable incidents shall be classified as indicated in the table below.

#### 9.2 Incidents that Must be Reported and Addressed immediately

All categories and types of incidents must be reported for immediate action to minimize harm resulting from the incident or accident. Reporting incidents will help the IPs and SPCU to understand the trends, analyse the rout courses and provide mitigation measures and strategies to prevent further occurrence.

Table 4: Reportable incidents

Inciden	Category	Description
t class		
	Fatal Incident	A work-related injury or illness that results in death. It includes deaths of non-IP personnel who are involved in Project activities
Class	Lost-time injury or illness	A work-related injury or illness that makes a person not able to perform his/her duties for at least seven (7) days. Weekends are included in the calculation of these days
one	Major environmental incident	An incident resulting in negative environmental impacts such as: impossibility to reverse within reasonable time and cost, persist beyond the duration of the project, and extend beyond the immediate neighbours of the operations.

	Major property damage incident:	An incident resulting in damage to property with damage cost equal to or above \$20 000
	Reportable social issue/incident	An issue arising from negative interactions with the public, community or other stakeholders leading to a significant negative impact on society or risking the project.
	Minor environmental incident	Any localised environmental impact that does not lead to greater impacts outside of the operations area and can be corrected easily within the operations area.
Class Two	Minor Injury/illness	Minor injury/illness requires immediate attention, but either does not interrupt the workflow or results a person not able to do his/her duties for less than seven (7) days; and does not lead to significant reduction in quality of life of the affected person
	Minor property damage	Incident with the cost of damage amounting to less than \$20 000.
	Near Miss	An incident in which there was no harm to personnel or reportable damage to property or the environment, but the occurrence had such potential for harm that it deserves to be addressed to avoid harm in the future

#### 9.3 Compensation strategy

SNSOP has no independent compensation arrangement. All the IPs and contractors involved in executing SNSOP program will use their respective compensation arrangement in case of any accident or incident resulting to fatalities, injuries, property loss or environmental damage. This clause should be clearly stipulated in the contractual agreement of all IPs, and contractors offering short- or long-term services to facilitate the project's activities. All stakeholders including beneficiaries require adequate information or assurance on the same to minimize compensation expectations. The information will be delivered during health and safety awareness or when executing different project activities in the field locations.

#### 10.0 MONITORING AND AUDIT

During LIPWs, UNOPS HSSE Assistants and community mobilization team under the guidance of the HSSE Specialist shall undertake daily site-specific supervision of LIPWs activities using public works /environmental and social safeguards checklist. This checklist entails areas of health and safety and environmental risks risk to be monitored during implementation. Generally, Health and Safety performance at site will be regularly monitored through:

- Daily field activities monitoring

- Weekly site inspections
- Ad hoc site inspections
- Internal peer reviews on request
- External audit visit if requested by UNOPS Head multicounty office, SPCU or world Banks.
- Monthly inspections and audit requirements from the World Bank

#### 10.1 Project files and records

Accordingly, the IP implementing component 1-Labour intensive public works (LIPWs) and light touch messaging, (UNOP) will use its health and safety management electronic files for saving records of this project to facilitate internal and external audit and review. It is a requirement that this shall be documented to allow accountability. As minimum, they will consist of:

- Health and safety meetings minutes
- Weekly site and office inspection reports
- Quarterly Health and safety site reports
- Incidents investigation reports and near misses
- Record of training and toolbox talks conducted.
- Internal and External Audits records.

Other implementing partners (specialized NGOs) will equally compile their health and safety (incidents, trainings and awarenesses) reports. SPCU will at any given time demand sharing of all reports on monthly or quarterly manner and cross-check the various records for confirmation. Where necessary, this will be availed to the world Bank for further guidance or reference purposes.

### APPENDIX A: POTENTIAL AVOIDABLE AND RESIDUAL RISKS

	Most of these risks and hazards cut across all components								
Potential Hazards/Risks	Risk Ratin g	Types (avoidable/residual)	Possibility to avoid	Hazard mitigation/Control measures	Responsibility	Time frame	Cost		
Spread of diseases or infections through dust inhalation or poor hygiene at work and exposure to hazardous or contaminated areas or vectors (in the field & offices)	1-6	Avoidable	Avoid contaminated areas, Sensitization on hygiene, no sharing of cups,	PPE -Face masks, Social (work) distancing, sanitization, frequency hand washing, regular inspections of work sites, fumigation (of offices)	All IPs, SPCU	Throughout project period	\$ 192000		
Heat stress while working under hot sun (beneficiaries)	1-10	Avoidable	Limit work to morning hours, or evening only	Encourage enough water intake and working in shifts	IP staff, CST	15 months of LIPW	\$ 00		
Fall or slip at workplace	1-6	Avoidable	Avoid entry to wed areas/floors, assess before working in wed area	Use of PPEs (Gumboots), regular inspections of work sites, avail first aid kits	IP staff, CST	15 months of LIPW	\$ 41907		
Heavy workload allocated for beneficiaries during LIPWs	1-6	Avoidable	Only lighter works given to beneficiaries(women), drop Subprojects with	Increase the workforce for heavy workloads, assign heavy workloads	CST, IP staff	15 months of LIPW			

			heavy workload during screening, work allocated proportional to number of beneficiaries	youth,			\$ 00
Robbery, looting and grabbing of beneficiary money by unknown persons at home or on the way home after receiving cash entitlement	1-8	Avoidable	Move in groups after receiving cash, cash distributed at safe place closed to beneficiary premises; continuous sensitization on such risks before start of payment.	Safe keeping of cash received, improve area security by local leaders, Immediate use of the money for intended purpose, cash to be well packed in envelops, give bigger money notes to the beneficiary	community	15 months of LIPW	\$ 00
Child labour (children under 18 years engaged in LIPWs)	1-8	Avoidable	No child<18 to do work, awareness of community on child labour (work norms),	Awareness, sending children home if found at work site, Use of GRM	IP staff, group leaders, CST	Project period	\$ 00
Beneficiaries working with children at their backs	1-6	Avoidable	Sensitization	Construct shelters for children, LIPW beneficiaries who become pregnant or lactating during project period will be exempted	CST, IP staff	15 months of LIPW	\$ 30,000

				from LIPWs activities			
Land dispossession or resource misuse	1-6	Avoidable	Signing of land donation agreement with witnesses, avoid activities that damage the land or community resources,	Outlining terms of land donation in meetings, use local authority to sort land issues, use of GRM	IP staff, Community leaders, CST and committees	15 months of LIPW	\$ 00
Lack of clear communication and transparency, ineffective oversight committees	1-6	Avoidable	Effective communication of project activities with clear responsibilities, trainings of staff & committees, provision of non-monetary incentive to committees	Continuous communication of project information, use GRM, engage stakeholders through meeting, workshops	SPCU, IP staff	Throughout Project period	\$ 25625
Socio-economic discrimination that leads to psychological issues among community members, and isolation of individuals	1-6	Avoidable	Community meeting/sensitization on selection criteria, Use SEP & GRM	Sensitization, GRM,	IP staff, community leaders,	Project period	\$ 00
Lack of adequate awareness on environmental protection, conservation leading to damages, pollution, infections,	1-6	Avoidable	Print clear IEC materials, staff training, effective communication of messages,	Regular monitoring of activities and refresher training, Use GRM,	SPCU, IP staff, CST	Throughout Project period	\$ 3000

loss of biodiversity, etc.							
Injuries or accidents to project staff and stakeholders including beneficiaries	1-10	Residual	Reduced driving/riding speed, Avoid unsafe areas, work distance (for beneficiaries),	Awareness, Site induction, use of First Aider, Use PPE, regular inspections of work sites, use of signages or corns or ribbons on site	IP staff, CST,	Throughout project period	\$ 42907
Security risks	1-10	Residual		Conduct Security risks assessment, engage stakeholders on the ground for regular security updates and support, Security risk awareness in case of any threat, Use SMP (security management plan)	IPs, SPCU, contractors, committees	Project period	\$ 00
Conflict/Fight or violence among beneficiaries at work or with community members because of the project activities	1-10	Residual	Regular sensitization, use of work norms with penalties, working separately for Refugee & Host, use SEP	and use of GRM, Avail First Aid Kits (in case it occurs)		LIPWs or CSM period,	\$ 40500

Flooding	1-8	Residual		Awareness of the impact of floods, dykes' formation, use of PPEs, relocation to safe place	UNOPS, CST, community leaders	15 months of LIPW	\$ 43500
Damage to properties including tools or equipment, project vehicles, motorcycles, etc.	1-8	Residual		Allocate safe areas for project properties, induction on use of tools, Regular briefing of beneficiaries on work norms	IP staff, CST	15 months of LIPW	\$ 50,000
Exposure to dusts during LIPWs	1-6	Residual	Use of Re-washable face masks, avoid exposure to dusts, close door while working indoor	Re-washable face masks, watering work area, working while door closed (during office work), plus sensitization in impact of this risk	All project staff, CST, beneficiaries	Project period	\$ 134000
Bite or stinging by insects or animals during work or within work premises	1-6	Avoidable/ Residual	Avoid bushy areas, inspect before working in the area,	Use of PPE (Gumboots) Avail first kits, refer to health facility once it occurs	CST, IP staff	Project period	\$ 41970
Loss of properties including tools, PPEs, etc.	1-8	Avoidable/ residual	Proper sensitization, identify good storage and allocate storekeepers, regular inventory.	Proper storage in the field areas, regular inventory, include penalties to work norms, awareness	IP staff, community leaders, contractor	15 months of LIPW	\$ 50,000

			Regular briefing on work norms.	sessions, Pay lost tools (for contractors)			
Electric shock specially staff, and beneficiaries in urban areas	1-6	Avoidable /Residual	Avoid areas with expose electric wires, Risks assessment before work, proper sensitization	Use of PPEs, sensitization, inspections	IP staff, CST, beneficiaries, SPCU	Throughout Project period	\$ 14407
GBV RISKS							
Domestic Violence related to cash received and women delayed at workplace	1-8	Avoidable/ residual	Sensitization on use of cash and decision-making women informed to reach home after before diverting to other directions,	, and the second	SPCU, IP staff, CST, committees	Project period	\$ 00
Sexual harassment during LIPW, CSM or economic opportunity activities	1-6	Residual	Sensitization, use of GRM, work norms	Use GRM and work norms, GBV action plan	SPCU, IP Staff, CST, Beneficiaries	Throughout project period	\$ 00
Sexual Exploitation and Abuse at workplace, or during activities of economic opportunities and CSM	1-6	Residual	Sensitization, GBV action plan	Use GRM and work norms, GBV action plan, GRM	SPCU, IP Staff, CST, Beneficiaries	Throughout project period	\$00

Sexual assault, and rape while	1-6	Residual	Sensitization, GBV action	GRM, GBV action plan,	SPCU, IP	Throughout	\$ 00
moving from home to the LIPW			plan	moving in groups for	Staff, CST,	project	
sites and for Cash payment				risky places,	Beneficiaries	period	

### APPENDIX B: INCIDENTS TRACKER INCLUDING NEAR MISSES.

Incident/near miss description	Date of incident	Location	Immediate cause	Corrective action taken	Incident review date	Status during review

# APPENDIX C: RISKS RATING MATRIX

		Risk Impact				
		Negligible	Minor	Moderate	Severe	Critical
L	Very Likely	5	10	15	20	25
I K		Low	Medium	High	Very High	Unacceptable
E L	Likely	4	8	12	16	20
Ι		Low	Medium	High	High	Very High
O H	Moderately	3	6	9	12	15
O D	Likely	Low	Low	Medium	High	High
	Unlikely	2	4	6	8	10
		Low	Low	Low	Medium	Medium
	Very Unlikely	1	2	3	4	5
		Very Low	Low	Low	Low	Low

# ANNEX 1: PRELIMINARY INCIDENT NOTIFICATION FORM (TO BE COMPLETED WITHIN 48 HOURS)

1.1: Incident Details						
Date of Incident:	Time:	Date Repo	rted to PCU:	Date Reported to WB:		
Reported to PCU by:	Reported to WB	<b>Notification Type</b> : Email/'phone call/media notice/other				
Full Name of Contrac	tor and/or subcontract	or (if applica	able):			
1.2: Type of incident (	please check all that ap	ply) <sup>1</sup>				
Fatality  Lost Time 1	Injury   Displacement	Without Due	Process  Chil	d Labor  Acts of		
Violence/Protest □ Di	sease Outbreaks   Force	ced Labor 🗆	Unexpected Im	pacts on heritage		
resources   Unexpect	ed impacts on biodiversi	ty resources				
Environmental pollutio	on incident □; Other □					
<sup>1</sup> See below for defi	nitions of (reportable) in	cidents				
1.3: Description/Narra	ative of Incident					
<ul><li>II. What were the c</li><li>III. Are the basic factor are those version</li><li>IV. Is the incident s</li></ul>	ons? till ongoing or is it conta ant authorities been infor	ces under when duncontest ained?	ich the incident ed, or are there o	occurred (if known)? conflicting versions? What		
Short Description of A	Action	Respons Party	_			
For incidents involvin	O					
	uspended? Yes $\square$ ; No $\square$ actor (if different from 1.					
	the instruction suspending					
	•					
<b>B5:</b> What support has	s been provided to affec	cted people				

#### ANNEX 2. INCIDENT TYPES-DEFINITIONS

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

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

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

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

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

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

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

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

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

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

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

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