

## Ministry of Education

**Improving Early Childhood Development (ECD) Project**

**(P168295)**

**Environmental and Social Management Plan (ESMP)  
For KG2 Sub-Projects at Al Ameen, Al Nasreh,  
Um salamah and Al Huda schools**

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## List of Acronyms

D.G.	Directorate General
DGB	Directorate General of Buildings
ECD	Early Childhood Development
EHS	Environmental, Health, and Safety
EHSG	Environmental, Health, and Safety Guidelines
EQA	Environment Quality Authority
EMP	Environmental Management Plan
ES	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health, and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESO	Environmental and Social Officer
ESRC	Environmental and Social Risk Classification
ESSs	Environmental and Social Standards
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
KG	Kindergarten
LMP	Labor Management Procedures
MoE	Ministry of Education
MoH	Ministry of Health
MOSD	Ministry of Social Development
MoTA	Ministry of Tourism and Antiques
OHS	Operation Health and Safety
PA	Palestinian Authority
PCU	Projects Coordination Unit
SEP	Stakeholder Engagement Plan
WB	World Bank

## 1. Executive Summary

This ESMP covers 4 sub-projects under component 2 of ECD project (Improving access to high quality KG services). The sub-projects consist of building four KG2 classrooms and amenities facilities (bathroom and kitchen) within the footprint of four existing schools namely: the Al Ameen, Al Nasreh, Um Salamah and Al Huda schools in Yatta in the Hebron Governorate. Each sub-project will also include supply and install of furniture for the classrooms and the schools' playgrounds.

The Environmental and Social Management Plan (ESMP) is prepared for the proposed four sub-projects in compliance with the national laws and regulations, the World Bank's ten Environmental and Social Standards (ESSs) and the ESMF prepared for the ECD project. As part of the ESMP, a specific section has been dedicated for the Stakeholder Engagement and Public Consultation.

The ESMP includes analysis of the sub-projects' environmental and social risks and impacts, and identify appropriate mitigation measures, including who is responsible for implementation.

The ESMP is prepared based on the environmental and social screening procedures as described in the ECD's ESMF which revealed that the subprojects have a Moderate environmental and social risk rating. This rating was assessed based on the fact that the sub-projects not being large or complex; not involving activities with high potential to harm people or the environment; site locations not being in environmentally or socially sensitive areas, and the low magnitude and predictable nature of risks, which can be easily mitigated through specified mitigation measures.

The construction works for the sub-projects will generate environmental and social impacts common to this type of civil work. Anticipated potential environmental and social impacts and risks include: (i) potential health and safety issues during working hours caused by unsafe work practices and/or uncontrolled access to construction sites including health and safety risk due to COVID-19, (ii) potential disruptions to learning caused by noise and air-borne pollutants and/or reduced access to classrooms if works are undertaken when schools are operational, (iii) contamination from improper waste management; (iv) risks related to labor and working conditions; and (iii) risk of exposure of students, women and community to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) by project workers. It is intended that these environmental and social impacts will be mitigated through the implementation of this ESMP. Additionally, the selected contractor will be required to prepare and implement a Contractor Environmental and Social Management Plan (C-ESMP). The C-ESMP will have to identify measures to be implemented by the Contractor to mitigate potential environmental and social impacts during construction. The C-ESMP will have to be approved by MoE and the World Bank prior to the commencement of construction.

The ESMP includes the results of the public consultation sessions conducted to share the information and the expected risks with the stakeholders and the sites specific consultations.

The ESMP has been prepared by the Directorate General of Buildings (DGB) and Projects Coordination Unit (PCU) at the Ministry of Education (MoE).

## **2. Introduction**

Improving Early Childhood Development (ECD) project aims to improve the coverage and quality of early childhood development services for children from gestation until age 5 in the West Bank. The project components are as follows:

Component 1: Health Care: Promoting early health development

Component 2: Education: Improving access to high quality KG services

Component 3: Improving availability of ECD Data

Component 4: Project management and implementation support

The second component of the ECD project, within the responsibility of MOE, includes construction activities such as refurbishment of KGs/schools' classrooms, supply and install of furniture, play areas, kitchen and rest rooms that are likely to have negative environmental and social impacts. The classification of risks associated with these activities is assessed as moderate to low risk. These risks are addressed in the ECD Environmental and Social Management Framework (ESMF). The KG2 sub-projects at **Al Ameen, Al Nasreh, Um salamah and Al Huda schools** are under component 2 of the ECD project for which the site specific ESMP for the schools is to be prepared in accordance to the screening process described in the ESMF. The screening reports are presented in Annex 1.

The ESMP shall be part of bidding documentation to procure the contractor for the sub-projects construction activities and should incorporate specific environmental and social measures where applicable to address any site-specific problems. The ESMP is prepared by Project Coordination Unit (PCU) at the MoE outlining measures to mitigate the potential negative environmental and social impacts relating to the four sub-projects.

## **3. Description of Sub-projects and Sub-project Activities**

The four sub-projects are located in Yatta city in the Hebron Governorate. Yatta city is located 12 km to the south of the city of Hebron, . Yatta is one of the largest cities in the Hebron Governorate in terms of population and area (about 25.5% of the total area of the governorate). The city is at elevation of 820m above the mean sea level and occupies an important position of a transitional area between the high mountains of Hebron in the north and the flat Negev region in the south. The city is extended on a large territory from Al-Thahiriyah in the west, Dura in the northwest and Hebron city to the north, reaching the Dead Sea depression in the east and the Green Line (the borders of the West Bank) on the outskirts of the Negev region in the south; most of the city's lands topography are flat and rugged terrain extends to the east. Figure 1 shows the location of the Yata . Following are the description of the sub-projects:

## مدارس من مديرية يطا

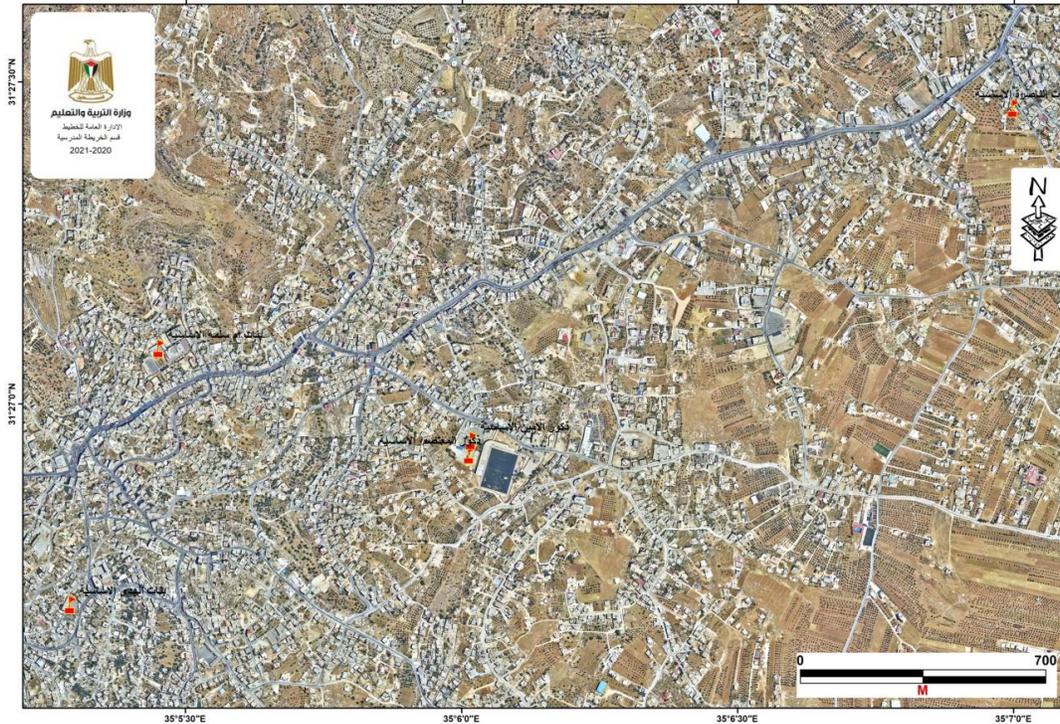


Figure 1: Location of KG2 sub-projects at Yatta, Hebron Governorate

- **KG2 sub-project at Al Ameen school:**

AlAmeen School where the he KG2 sub-project will be constructed is of total are area is 1200 m2 and is located in the middle part of Yatta, adjacent to Yatta international Stadium and surrounded by other schools.

**The subproject includes** construction of new KG2 classroom to host 25 students of total area70 m2 within the footprints of the Al Ameen school, 3 meters to the west of the school building. The contractor will create an opening through the exiting wall so the proposed site has a direct access gate to the main street which will be used by the machineries and worker to reach the site directly.

The subproject will include construction of all amenities i.e., kitchen, bathroom, playground, and the supply of furniture, playground furniture according to the design and the MoE specifications, including the use of a natural/manufacture stone to build the new classroom and its ancillary facilities. The estimated cost of construction is about 77,000 \$. The subproject will be built on the school land where no land acquisition is required. The proposed site for the KG2 sub-project at Al Ameen school is illustrated in the Arial photo (Figure 2):



Source (Geomolg ,2021)



Figure 2: The proposed site for the KG2 sub-project at Al Ameen school

- **KG2 subproject at Al Nasreh school:**

The sub-project is located in the north part of Yatta in Hebron Governorate. The activity includes construction of new KG2 classroom and facilities within the footprint of the existing school which has an area of 3000m<sup>2</sup>. The total building area of one classroom and the facilities (bathrooms and kitchen) is 70 m<sup>2</sup>. The expected capacity of the classroom is estimated to accommodate 25 students. The cost of construction is 106,300 \$ including the kitchen, bathroom, playground, furniture, and playground furniture. Currently, the KG2 students are using the toilets assigned for the grade 1 and 2 students.

The works activities include excavations for the foundations, concreting, brick masonry, carpentry, plumbing, welding, electrical works, glazing, painting and finishing of the building and supply and install of the playground furniture according to the design and the MoE specifications, including the use of a natural/mmanufacturer stone to build the new classroom and its ancillary facilities.

A kindergarten unit will be built on the western part of the school playground attached to the school building, which is governmental land, and no land acquisition will be required. The surrounding area of the proposed location is residential from north and east and open land from the south.

The proposed site has an access through the existing school gate open direct to the main street (10 m wide) at the west side of the school through the playground of the existing school. The sub-project site has an abandoned cistern that will be filled with rocks before construction. The machineries, worker, students and teachers will use the same entrance.

The proposed site for Al Nasreh new extension is illustrated in the below Arial photo (Figure 3).



Source (Geomolg ,2021)



Figure 3: The proposed site for KG2 sub-project at Al Nasreh school

- **KG2 subproject at Um Salamah school:**

The sub-project is located in the middle part of Yatta in Hebron Governorate. The activities include construction of new KG2 classroom in the footprint of the existing school of 3990 m<sup>2</sup>. The total building area of one classroom and facilities (bathrooms and kitchen) is 70 m<sup>2</sup>. The expected capacity of the classroom is estimated to accommodate 25 students. The cost of construction is 77,000 \$ including the kitchen, bathroom, playground, furniture and playground furniture. Currently, the KG2 students are using the toilets assigned for the grade 1 and 2 students.

The works activities include excavations for the foundations, concreting, brick masonry, carpentry, plumbing, welding, electrical works, glazing, painting and finishing of the building and supply and install of the playground furniture according to the design and the MoE specifications, including the use of a natural/manufacture stone to build the new classroom and its ancillary facilities.

A kindergarten unit will be built on the Southern west part of the school, which is governmental land, and no land acquisition will be required. The construction area includes a few no. of trees that may be uprooted and to be replanted in different location within the school premises. The surrounding area of the proposed location includes **residential houses** from the southeast and southwest, and **two schools** from the other directions.

The proposed site is an open area where a direct access road from the main street is available. The access road is at least 8 meters wide where the machineries and workers can use it to reach the site directly.

The proposed site for Um Salamah new extension is illustrated in the below Arial photo (Figure 4).



Source (Geomolg ,2021)



Figure 4: The proposed site for the KG2 sub-project at Um Salamah school

- **KG2 subproject at Al Huda school:**

The subproject is located in the middle part of the old town of Yatta in Hebron Governorate and consists of construction of new KG2 classroom and amenities facilities (bathrooms and kitchen) within the footprint of the existing school of 3000 m<sup>2</sup>. The total building area of one classroom and facilities is 70 m<sup>2</sup>. The expected capacity of the classrooms is estimated to accommodate 25 students. The cost of construction is 120,600 \$ including dismantling the existing shade area, the construction of the kitchen, bathroom, playground, furniture and playground furniture. Currently, the KG2 students are using the toilets assigned for the grade 1 and 2 students.

The works activities include excavations for the foundations, concreting, brick masonry, carpentry, plumbing, welding, electrical works, glazing, painting and finishing of the building and supply and install of the playground furniture according to the design and the MoE specifications, including the use of a natural/manufacture stone to build the new classroom and its ancillary facilities.

The sub-project will be built on the southern part of the school playground, which is governmental land, and no land acquisition will be required. The surrounding area of the proposed location includes residential houses from all sides.

The proposed site has a direct access through the existing school gate which is located at the main street (10 m wide) at the southeast side of the school through the playground of the existing school. The machineries, worker, students and teachers will use the same entrance.

The proposed site for Al Huda new extension is illustrated in the below Aerial photo (Figure 5):



Source (Geomolg ,2021)



Figure 5: The proposed site for KG2 sub-project at Al Huda school

#### 4. ESMP Scope and Objective

The objectives of the ESMP include:

- To reduce environmental and social impacts associated with the KG2sub-projects construction activities.
- To minimize risk to students and the community during the construction works; and
- To ensure Health, Safety & Environmental (HSE) obligations are implemented throughout project development and construction activities.

The ESMP consists of mitigation measures considered necessary for implementation by the MoE, the consultancy Firm (who will supervise the environmental health and safety of the sub-project implementation), and the contractor(s) to ensure the proper environmental and social management of the KG2 sub-projects construction.

## 5. Policy, Legal and Regulatory Framework

### 5.1. The National Regulations and Guidelines

The project will comply with the following National specific policy, legal and administrative frameworks relevant to the project:

- Palestinian laws and regulations including revised Palestinian Basic Law of 2003, Palestinian Environmental Law No. 7, 1999,
- The National Strategy for Solid Waste Management for the period 2017-2022,
- The Environmental Assessment Policy Resolution No: 27 23/4/2000,
- The Palestinian Labor Law No 7, 2000,
- The Palestinian Public Health Law No 20, 2004,
- The Ministry of Health (MoH) guidelines to combat COVID-19,
- The Grievance and Complaints bylaw; approved by the Ministerial Cabinet on 9/3/2005 and updated on 8/3/2009 in addition to the GM established at the project's level,
- Palestinian Ministerial Decision (6) of year 2020 on Codes of Conduct which includes generic instructions for conducting the relation between co-workers.

### 5.2. Applicable World Bank Environmental and Social Standards

A gap analysis was made to the applicable ESSs and Palestinian's National laws and International good practice commonly used in Palestine as shown in the project's updated ESMF<sup>1</sup>.

The environmental and social risk classification and the applicable ESSs for the KG2 sub-projects at Al Ameen, Al Nasreh, Um salamah and Al Huda schools were conducted using the screening report described in the ESMF for the ECD project and a summary is provided hereafter. The sub-projects risks are classified as Moderate<sup>2</sup>, with five of the ten standards screened as relevant (ESS1, ESS2, ESS3, ESS4 and ESS10). The screening of social risks and impacts is based on discussions with beneficiaries and stakeholders involved in the sub-projects including teachers and parents of students at schools, nearby affected people from the community, MOE including D.G. of Buildings at MOE. ESS screening also took into account national legal and policy requirements related to the environment and social environment, and the application of COVID-19 protocols. ESS5, ESS6, ESS7, ESS8 and ESS9 are assessed as not relevant to the project; required environmental and social actions to address the relevant standards are shown in table 1.

Table 1: Relevant ESSs and Required Environmental and Social Actions

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<sup>1</sup> <http://www.palpcu.ps/files/ESMF-ECD-%20Environmental%20and%20Social%20Management%20Framework.pdf>

<sup>2</sup> As set out in the Sub-projects screening reports conducted by MoE

<b>Required Project Environmental and Social Standard Actions</b>	
<b>Environmental and Social Standards</b>	<b>Required Measures and Actions</b>
<b>ESS1 Assessment and Management of Environmental and Social Risks and Impacts</b>	<p>The subprojects activities entail risks related to construction and finishing activities include potential disruptions to learning caused by noise and air-borne pollutants and/or reduced access to classrooms, solid waste generation, wastewater generation, occupational health and safety, health and safety risk on students, teachers and community, low risk of uprooting trees or bushes at Um Salama School, and social disturbance such as the traffic safety, in addition to risks related community mainly from the construction laborer, child labor and Gender Based Violence which include sexual harassment of women and girls and exploitative sexual relations and risk of exposure to COVID-19.</p> <p>MoE will be responsible for the management of environment, social, health and safety (ESHS) risks and impacts of the sub-projects.</p> <p>The ESMP provides guidance with respect to management of ESS1.</p>
<b>ESS2 Labor and Working Conditions</b>	<p>Potential labor risks are related to OHS, working conditions, child labor, and SEA/SH risks. An LMP has been prepared for the ECD project<sup>3</sup> to be adopted and applied under the sub-projects. A Labor Grievance Mechanism (refer to the LMP) has been prepared which includes provisions to prevent SEA/SH, gender-based violence (GBV) and/or violence against children in the workplace.</p> <p>OHS management is included in this ESMP.</p>
<b>ESS3 Resource Efficiency and Pollution Prevention and Management</b>	<p>ESS3 is relevant to the project. Sub-projects are small-scale construction projects. Though, energy and/or raw materials consumptions are expected to be moderate and local materials and energy efficient supplies is expected to be used. Construction building waste, mainly debris, plastic, carton, and other residues from construction works in addition to wastewater generated from lavatories during construction will be produced and properly disposed. Hazardous waste (lead-based paint residue from construction, spent oils, or asphalt used for) will also be considered at the design phase of building construction and appropriate mitigation will be included in the contractor's bid documents and the contractor's ESMP. This ESMP sets out mitigation measures for waste management.</p>
<b>ESS4 Community Health and Safety</b>	<p>ESS4 is relevant to the sub-projects. The ESMP concluded that the construction activities risks and impact mainly related to students and teachers health and safety, community health and safety, in addition to the air quality, noise, vibration, and disturbance in the surrounding of construction area, the neighboring classrooms and community. Works will be contained within school footprint and the public can be excluded; specific mitigation has been put in place to ensure student safety if any construction works are undertaken during terms and schooling hours.</p> <p>Moreover, there is potential risk due to traffic safety movement in</p>

<sup>3</sup> <http://www.palpcu.ps/files/LMP-ECD-Labor%20Management%20Procedures.pdf>

<b>Required Project Environmental and Social Standard Actions</b>	
<b>Environmental and Social Standards</b>	<b>Required Measures and Actions</b>
	<p>the surroundings of the subprojects conveying equipment's and construction materials on the near the community's roads and inside the school.</p> <p>The ESMP also includes an assessment of associated risks relating to GBV/SEA/SH for teachers and children arising from laborers presence in the school premises; and identifies suitable management measures and mitigation.</p>
<b>ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	ESS5 is not relevant for the sub-projects. The scale of physical works is small scale of 70 m2. Buildings will be located on school footprint on Governmental lands. No private land is required and no human resettlement is required.
<b>ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	ESS6 is not relevant. Buildings will be within the schools' footprint on Governmental lands. These areas are highly modified and do not have any natural values.
<b>ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	ESS7 is not relevant.
<b>ESS8 Cultural Heritage</b>	ESS8 is not relevant to the sub-projects. Buildings will be within school footprint on Governmental lands. No obvious cultural heritage artifacts are apparent at each site. Chance find procedures have been included in the ESMP.
<b>ESS9 Financial Intermediaries</b>	ESS9 is not relevant.
<b>ESS10 Stakeholder Engagement and Information Disclosure</b>	<p>An SEP has been prepared for the ECD project<sup>4</sup> and Project Grievance Mechanism (GM) have been prepared as set out in the SEP and this ESMP. The SEP and GM will be adopted and implemented for the sub-projects.</p> <p>The GM will be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the sub-projects, consistent with ESS10.</p> <p>Consultations with beneficiaries and affected parties were conducted as part of the site specific ESMP preparation in line with the SEP and in compliance with the Technical Note on Public Consultations and Stakeholder Engagement in WBG-supported operations during COVID-19s.</p>

### 5.3. Environment, Health and Safety Guidelines

<sup>4</sup> <http://www.palpcu.ps/files/SEF-ECD-Stakeholder%20Engagement%20Framework.pdf>

<sup>5</sup> [https://biwta.portal.gov.bd/sites/default/files/files/biwta.portal.gov.bd/page/f3ca1ff6\\_95b0\\_4606\\_849f\\_2c0844e455bc/2020-10-01-11-04-717aa8e02835a7e778b2fff46f531a8c.pdf](https://biwta.portal.gov.bd/sites/default/files/files/biwta.portal.gov.bd/page/f3ca1ff6_95b0_4606_849f_2c0844e455bc/2020-10-01-11-04-717aa8e02835a7e778b2fff46f531a8c.pdf).

The World Bank Group Environment, Health and Safety Guidelines<sup>6</sup> (EHS) are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). They define acceptable pollution prevention and abatement measures and emission levels in World Bank financed projects. The project will apply the EHS including occupational Health related to contracted workers.

#### **5.4. COVID-19 Considerations**

The Government of Palestine addressed COVID-19 with some emergency resolutions and policies that include universal guidelines aligned with WHO guidelines related to social distancing, masks and a complete ban on large gatherings. The Ministry of Health (MoH) is regularly updating the COVID-19 measures that are mandatory in the country.

In addition to the Government guidelines, the World Health Organization (WHO) guidelines in response to COVID-19 such as the procedures for protection workers in relation to infection control precautions and provision of immediate and ongoing training on the procedures to all categories of workers will be used. As the COVID-19 situation varies, it is critical that MoE keep abreast of guidance provided by the WHO and other international best practice.

### **6. Potential Environmental and Social Impacts, Risks and Mitigation Measures**

This section provides a brief description of the relevant environmental components and any potential impacts anticipated. During the construction phase, activities such as excavations, concreting, brick masonry, carpentry, plumbing, welding, electrical works, glazing, painting, finishing are risk generating activities associated with the operation of machinery, transport of materials, cranes, trucks and application of civil works in the sub-projects' sites. Key areas of potential risks are discussed in the following sections:

#### **6.1. Noise and vibration and Air Quality**

The impact of construction noise depends on the proximity of the construction activities to noise sensitive receptors (NSRs), including residential areas and the existing school. Therefore, as the sub-projects sites are within the footprint of the existing schools and not far from the residential areas, then the impact of construction noise will be moderate and of concern due to disruptions to learning if works (construction, and dismantling activities) are undertaken when schools are operational. This impact, however, is anticipated to cause temporary and local nuisance, given that the impacts are reduced with the application of the mitigation measures stated below.

The sub-projects can have impacts on the localized air quality through the generation of particulate matter, additionally, the excavation on all types of soils such as semi rock and

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<sup>6</sup> [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/ehs-guidelines](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines)

correlated soil (Al Ameen school) and the soil and soft rock (Al Huda, Al Nasreh & Um salamah sites) can generate particles.

Limited no. of trucks transporting construction materials and debris to and out of the site, if uncovered, can generate particles. Vehicles accessing the project site can also generate some amount of dust. At the construction site, materials stockpiles and some construction activities such as mixing of cement, cutting of concrete, etc., can also generate particulate matters. The air quality impact due to the above-mentioned activities is considered of moderate significance and can be mitigated to low significance if mitigation measures are implemented. Fugitive emission impacts on air quality should be fully controlled by applying proper mitigation measures stated below.

#### Mitigation measures

##### *Mitigation measures include:*

Implement a construction site management plan including the following measures:

##### Noise

- Work schedule for the dismantling activities at Banat AlHuda school, and excavation activities at all sites where high voice machinery and shakiness machinery will be conducted outside the schooling/KG hours (i.e. after 12:00 Noon), no works will be allowed at night time or during weekends or holydays is allowed.
- Citizens should be informed of high noise machinery working including the excavation.
- Repair any damage occurs in coordination with the appropriate service provider before proceeding.
- When applicable, shutting down equipment when it is not directly in use
- Equipment should be regularly serviced to minimize noise
- Workers must wear hearing protection PPE (i.e., earmuffs) while working at noise generating activities.
- Idle machines, vehicles and trucks must be turned off.

##### Air Quality

- Dust suppression method should be applied, i.e. spray of water, vehicles transferring material to be properly covered.
- Ensuring that vehicles are loaded in such a manner as to prevent falling off or spilling of construction materials and by sheeting the sides and tops of all vehicles carrying sand, other materials, and debris.
- Avoid work during windy days
- The surrounding environment (side-walks, roads) shall be kept free of debris to minimize dust and reduce risks for pedestrians.
- Idle vehicles and trucks are turned off.

#### Monitoring activities:

- The consultancy should observe unacceptable dust emissions and exhaust emissions and document them in monthly progress reports.

- Complaint's recording would be undertaken by the consultancy firm. When complaints are received, they should be recorded and documented in monthly progress reports.

## **6.2. Damage to existing underground public services**

Excavation during construction activities may result in a damage to existing underground public services (Water, Wastewater, electricity, etc.). Without accurate maps of underground infrastructure, every construction project has the potential to cause this damage. The risk of damaging the underground services during the construction is assessed to be low, short term, localized and can be mitigated by applying the below measures.

### Mitigation measures

- Additional survey to identify potential wastewater services (underground pipes and septic tanks) locations prior excavation works, appropriate control measures should be taken to prevent spill.
- Monitoring of site excavation
- If wastewater services are damaged or impacted, works should be stopped, and repair any damage which occurs in coordination with the appropriate service provider before proceeding. In this case all the sites must be clean up before the work can start.

## **6.3. Public and workers safety**

As described above, the construction sites at Al Ameen, AlNassreh, Um Salamah and Al Huda schools are within the footprint of the existing schools, and not far from the residential areas or neighboring schools. Moreover, the access roads are used by the schools' students, therefore, attention will need to be given to students/public/community health and safety. The construction vehicles will cause temporary interruption of road traffic for relatively short period of time especially during pouring the ready-mix concrete. The access roads could generate a risk and concerns during the constructions period during the school hours.

The risk on students/public/community health and safety on traffic disturbance during the construction is assessed to be moderate, short term, localized and can be mitigated with development of a traffic management plan.

### Mitigation measures

In accordance with the provisions of ESS4 (particularly section A) of the World Bank's ESF, the Contractor will implement the following:

- The contractor shall close the working area, limit access to verified personnel only and provide safe passages to students and school staff in coordination with the school administration.
- The Contractor shall prepare and implement a Traffic Management Plan to ensure that any traffic and/or pedestrian hazards caused by the works are adequately managed.

- Ensure placing of traffic signs, road markings, barriers and other measures as may be necessary for ensuring traffic safety around the construction site.
- Ensuring that vehicles are loaded in such a manner as to prevent falling off or spilling of materials, construction vehicles, equipment and materials (such as sand, gravel and waste) will not encroach on sidewalks and public space and will not block safe pedestrian passage, including safe access from parents and children to the schools. If sidewalks are blocked, alternative route for pedestrians shall be proposed and signs to allow pedestrian to change sidewalks.

#### **6.4. Workers Occupational Health and Safety**

The construction activities will attract (70) workers for all sub-projects depending on the works phase (concrete works tilling, painting, electrical works, plumbing, etc.). During the construction phase, workers are susceptible to OHS risks from all construction activities including excavation, scaffolding, pouring and leveling of concrete, plumbing, electrical installations, finishing, etc, in addition to the abandoned cistern, OHS risk due to COVID-19 is also expected. The main risks to OHS are from the following specific construction activities:

- Excavation and Trenching
- Fallings, for example, from the scaffolds or during filling the abandoned well
- Stairways and ladder
- Using the heavy construction equipment for demolition and construction activities.
- Electrical, plumbing, finishing, installation of equipment, etc.

The occurrence of OHS risk has moderate to low probability, possible and could be minimized through abiding to tailored OHS plan for the civil works activities. The OHS risks will be reduced with the application of the mitigation measures stated below.

#### Mitigation measures

Based on the provisions of ESS2 on OHS of the WB,

- Contractor shall prepare and implement OHS plan (to be approved by MoE and the World Bank prior to the commencement of construction) in reference to the Project Occupational Health and Safety Manual<sup>7</sup>.
- The contractor shall be responsible for providing the employees under his responsibility with Medical Insurance during the contract's duration.
- Contractor to provide workers with PPE's free of charge (vests, gloves, HD wearing apparel, helmet and equipment for protection from Covid-19)
- Follow Ministry of Health (MoH) and WHO regulations related to combatting Covid-19, and to sign commitment letter aiming to follow the MoH and WHO guidelines.
- Any registered COVID-19 case or the contact of COVID19 case among workers, contractor will be requested to notify the OHS Officer by email and to follow the national COVID-19 prevention instruction issued by the MoH and WHO guidelines.

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<sup>7</sup> <http://www.palpcu.ps/files/ECD-%20OHS%20Manual%20%20QA%20final%20.pdf>

- Workers commitment to OHS measures and PPE's including (vests, gloves, HD wearing apparel, helmet and equipment for protection from Covid-19.
- Provide a first aid box close to the site and maintain their proper usage and training.
- Provide sanitary lavatory, water and sanitation facilities for workers. These facilities should be situated/located in a manner that prevents spread of disease among school users, particularly children, who may be on the premises during the construction activity.

### **6.5. Non-Hazardous and hazardous waste**

Based on experience with similar construction activities in Palestine, quantities of waste generated from construction activities are likely to be low, principally as a consequence of the costs of materials. Solid waste expected to be generated includes domestic and construction waste such as packaging materials, wood, formwork, etc. Toxic and Hazardous Materials such as lead based paint will be used for the construction activities of the sub-projects. Construction workers may be inhaling the lead dust and also track the lead dust to their homes and nearby communities. Through exposure to asphalt and inhalation and tracking, construction workers, their families and communities, can be exposed to the hazardous effects of asphalt and lead.

#### Mitigation measures

Based on the provisions of ESS3 of the WB, the contractor should follow the waste management procedures (Hazardous and Nonhazardous) including handling, storage, transport and disposal to authorized landfill taking into consideration workers health and safety measures, and measures to minimize exposure to COVID-19.

##### **Non-Hazardous Solid Waste:**

- Domestic solid waste is collected into closed containers or bins
- works solid waste is properly collected at designated area
- Concrete washout shouldn't be poured on roadsides or in the public sewer
- Records of solid and domestic waste disposed of from site and evidence of proper disposal at landfills will be available (municipal receipt)

##### **Hazardous Waste (solid and liquid)**

- Hazardous materials are properly labeled
- Workers inducted regarding the proper handling and safe disposal of hazardous material will be available and in accordance with Material Safety Data Sheet (MSDS)
- Hazardous material and waste are collected temporarily at designated areas that are properly isolated and contained to minimize and control potential spillage.
- Instructions for prohibition of changing oil and filters at site are in place
- Waste will be disposed to authorized site at the end of working period, Records of proper hazardous waste disposal and via authorized contractor are available.
- Evidence of workers induction regarding the proper handling and disposal of hazardous material will be available and in accordance with Material Safety Data Sheet (MSDS)

##### **Domestic Wastewater:**

- Designated restrooms for workers are available

Observation of accumulated waste, in terms of waste stockpiles and waste bins. This monitoring activity will be undertaken at the end of each business day by the contractor and reported in monthly reports.

#### **6.6. Labor and working conditions**

The construction activities will attract workers whose number is expected to be 70 for the 4 sub-projects during the construction phase with only a maximum of 10 workers will be on-site at the same time. And the number of workers will be exactly determined when the contractor of the project is consulted. The workforce will be skilled and unskilled labor from the neighboring localities. Project contracted workers may include among others:

- Managers and Engineers-Skilled experts (civil, electrical and mechanical, ES Specialist)
- Supervisors, inspectors, foremen and Operators-Skilled experts
- Technicians (inspectors, drivers)-Skilled experts
- Flagmen, diggers, cleaning, Watering-Unskilled workers

Potential risks/issues related to employment of workers have been identified to be associated with the project which may relate to:

- Indiscriminate human resources policies and procedures;
- Indiscriminate working hours and leaves;
- Indiscriminate wages and benefits
- Discrimination on equal opportunities;
- Grievances;
- Child labor

Mitigation measures

MoE shall:

- Ensure that the contractors implement the LMP disclosed at the MoE website on October/2021.  
<http://www.palpcu.ps/files/ECD-LMP%20Restructuring%20%20Final%20-October%206.pdf> (separate document) for mitigating the labor and working conditions through developing guidelines in the bidding documents that reflect the LMP requirements.
- Ensure that terms and conditions of all sub-projects' workers are in accordance with the requirements of national law and ESS2 as indicated in the LMP. Guidelines shall include among others:
  - Workers' age is equal or above 18 years;
  - Employees and workers sign CoC; and
  - Contractor provide workers' GM where workers will be able to lodge their complaints, concerns, difficulties as described in the LMP that includes special tools to receive and handle SEA/SH cases. Contractor shall provide induction training on GRM, CoC and basic safety awareness will be provided to all workers.

## **6.7. GBV/SEA/SH**

The sub-projects involve civil works/construction activities.

The project will be implemented in within the footprint of existing schools and near some residential areas where the risk of SEA/SH is potentially possible. There is a risk of SEA/SH due to interaction between students/school staff/local community and the contracted workers during the construction activities. The SEA/SH/GBV risk is rated as moderate. The SEA/SH/GBV risk will requisite mitigation measures (e.g. implementation of Code of Conduct (CoC) for workers; special features in the project GMs (for beneficiaries and workers) to address potential cases of SEA/SH/GBV and provision of requisite training to personnel in this regard etc.) will be included in the bidding documents, and implemented.

### Mitigation measures

- Code of conduct to be signed by the contractor. It should include prevention of sexual exploitation and abuse and sexual harassment (SEA/SH) and gender-based violence (GBV) at workplace.
- The project level GRM will include specific procedures for GBV, SEA/SH including confidential reporting and ethical documentation of GBV cases.
- The contractor will establish a workers' complaints system for workers and staff.
- Contractors to conduct an orientation session for their workforce on the GRM prior to the start of construction work. GRM also addresses child labor, GBV and sexual harassment related grievances

### Monitoring measures

- Complaints raised due to laborer
- Documentation of corrective measures adopted
- Training on CoC.

## **6.8. Chance Find Procedure**

The possibility of a discovery of an artifact during construction is extremely low. However, a Chance Find Procedure should still be in effect and should be implemented if there is a discovery. This should be included to cater for if during excavations archaeological pieces are found.

### Mitigation measures

- Stop the activities in the area of the chance find.
- Delineate the discovered site or area (e.g. fencing).
- Secure the site to prevent any further disturbance, damage or loss. In cases of human remains, arrange for a guard to watch the site until the MoE take over.
- Prohibit the collection of any object by any person.

- MoE will notify the Ministry of Tourism and Antiquities (MoTA) within 24 hours.
- Project works can resume only after instruction is provided from the MoTA

### **6.9. Temporary use of private land (during construction)**

The sub-projects will be within the schools' footprint on Governmental lands and no private land or human resettlement is required. However, the contractor should avoid any use of private land during construction, except of presence of legal document between contractor and citizen to use the land for short time.

Impacts and mitigation measures during operation phase are summarized in the ESMP.

## **7. Management Measures**

The construction of the sub-projects will be done in a manner that will ensure impacts to the environment are prevented and minimized and the health and safety of workers, school staff and the surrounding community are maintained. As such, in executing the project, mitigation measures identified in the previous section will be implemented at the level of the MoE PCU, the environmental and Social Specialist for the Consultancy Firm, and the contractor.

The Contractor will be required to comply with all national regulatory requirements and best practices, and ensure activities are in compliance with the ESF of the World Bank. The Contractor is required to implement the mitigation measures outlined in this ESMP and in the Management Strategies and Implementation Plans (MSIP) to manage the (ES) risks that cumulatively forms the C-ESMP that shall be prepared by the Contractor. Other applicable measures recommended by the Consultancy Firm or MoE PCU are also to be implemented.

To ensure the above, several management measures are to be implemented, as is outlined below:

- Sub-project's ESMP
- Environmental and Social Management Organizational Structure
- Contractors' Environmental and Social Management Plan C-ESMP
- Contractors Code of Conduct (CoC) for Workers
- ESHS Monitoring
- ESHS Reporting
- Grievance Mechanism
- Stakeholder Engagement

### **7.1. Sub-project's ESMP**

Table 2 presents a summary of the ESMP.

**Table 2: Environmental and Social Management Plan (ESMP)**

The ESMP will annexed to the bidding documents to be implementing by the contractors. The BOQ will include a note that cost of implementing the project activities to include all environmental and social measures necessary for ensuring the project is implemented in compliance with the ESMP.

Potential Impact	Mitigation Measures	Operation/ Responsibility	Supervision	Monitoring	Duration
<b>Construction Phase</b>					
Noise	<ul style="list-style-type: none"> <li>▪ When applicable, shutting down equipment when it is not directly in use</li> <li>▪ Work schedule for the dismantling activities at Banat AlHuda school, and excavation activities at all sites where high voice machinery and shakiness machinery will be conducted outside the schooling/KG hours (i.e. after 12:00 Noon), no works will be allowed at night time or during weekends or holydays is allowed.</li> <li>▪ Citizens should be informed of high noise machinery working including the excavation.</li> <li>▪ Equipment should be regularly serviced to minimize noise</li> <li>▪ Workers must wear hearing protection PPE (i.e., earmuffs) while working at noise generating activities, i.e. demolition and excavation.</li> <li>▪ Idle machines, vehicles and trucks must be turned off.</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/ES O <sup>8</sup>	Throughout the construction period
Air Quality	<ul style="list-style-type: none"> <li>▪ Ensuring that vehicles are loaded in such a manner as to prevent falling off or spilling of construction materials and by sheeting the sides and tops of all vehicles carrying sand, other materials, and debris.</li> <li>▪ Dust suppression method applied (i.e. spray of water) Vehicles transferring material to be properly covered.</li> <li>▪ Avoid work during windy days</li> <li>▪ The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust and reduce risks for pedestrians.</li> <li>▪ Idle vehicles and trucks are turned off</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/ES O	First –sixth month
Damage to existing underground public services (Water, Wastewater, electricity, etc.)	<ul style="list-style-type: none"> <li>▪ Additional survey to identify potential wastewater services (underground pipes and septic tanks) locations prior excavation works, appropriate control measures should be taken to prevent spill.</li> <li>▪ Monitoring of site excavation</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/M oE-ESO	During the excavation activities

<sup>8</sup> The MoE PCU has as part of its team an Environmental and Social Officer (ESO), identified in the next section.

Potential Impact	Mitigation Measures	Operation/ Responsibility	Supervision	Monitoring	Duration
	<ul style="list-style-type: none"> <li>If wastewater services are damaged or impacted, works should be stopped, and repair any damage which occurs in coordination with the appropriate service provider before proceeding.</li> </ul>				
Public and workers safety	<ul style="list-style-type: none"> <li>The Contractor shall prepare and implement a Traffic Management Plan to ensure that any traffic and/or pedestrian hazards caused by the works are adequately managed.</li> <li>Ensure placing of traffic signs, road markings, barriers and other measures as may be necessary for ensuring traffic safety around the construction site.</li> <li>Ensuring that vehicles are loaded in such a manner as to prevent falling off or spilling of materials, construction vehicles, equipment and materials (such as sand, gravel and waste) will not encroach on sidewalks and public space and will not block safe pedestrian passage, including safe access from parents and children to the schools. If sidewalks are blocked, alternative route for pedestrians shall be proposed and signs to allow pedestrian to change sidewalks.</li> <li>Closure of the working area, limit access to verified personnel only and provide safe passages to students and school staff in coordination with the school administration.</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/ESO	Throughout the construction period
Workers occupational health and safety	<p>Based on the provisions of ESS2 on OHS of the WB:</p> <ul style="list-style-type: none"> <li>Contractor shall prepare and implement OHS plan measures considering in compliance with the Project Occupational Health and Safety Manual</li> <li>Contractor to sign commitment letter aiming to follow the MoH and WHO guidelines.</li> <li>The contractor shall be responsible for providing the employees under his responsibility with Medical Insurance during the contract's duration.</li> <li>Contractor to provide workers with PPE's free of charge (vests, gloves, HD wearing apparel, helmet and equipment for protection from Covid-19)</li> <li>Follow Ministry of Health (MoH) and WHO regulations related to combatting Covid-19.</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/ESO	Throughout sub-project implementation

Potential Impact	Mitigation Measures	Operation/ Responsibility	Supervision	Monitoring	Duration
	<ul style="list-style-type: none"> <li>▪ Any registered COVID-19 case or the contact of COVID19 case among workers, contractor will be requested to notify the OHS Officer by email and to follow the national COVID-19 prevention instruction issued by the MoH and WHO guidelines.</li> <li>▪ Worker’s commitment to OHS measures and PPE’s including (vests, gloves, HD wearing apparel, helmet and equipment for protection from Covid-19.</li> <li>▪ Install of safety net for activities that may require work on heights</li> <li>▪ Provide a first aid box close to the site and maintain their proper usage and training</li> <li>▪ Provide sanitary lavatory, water and sanitation facilities for workers. These facilities should be situated/located in a manner that prevents spread of disease among school users, particularly children, who may be on the premises during the construction activity.</li> </ul>				
Non-Hazardous and hazardous waste management	<p>Based on the provisions of ESS3 of the WB the contractor should follow the waste management procedures (Hazardous and Nonhazardous) including handling, storage, transport and disposal to authorized landfill taking into consideration workers health and safety measures, and measures to minimize exposure to COVID-19.</p> <p><b>Non-Hazardous Solid Waste:</b></p> <ul style="list-style-type: none"> <li>▪ Domestic solid waste is collected into closed containers or bins</li> <li>▪ works solid waste is properly collected at designated area</li> <li>▪ Concrete washout shouldn’t be poured on roadsides or in the public sewer</li> <li>▪ Records of solid and domestic waste disposed of from site and evidence of proper disposal at landfills will be available (municipal receipt)</li> </ul> <p><b>Hazardous Waste (solid and liquid)</b></p> <ul style="list-style-type: none"> <li>▪ Hazardous materials are properly labeled</li> <li>▪ Workers inducted regarding the proper handling and safe disposal of hazardous</li> <li>▪ material will be available and in accordance with</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/ES O	Throughout the sub-project implementation



Potential Impact	Mitigation Measures	Operation/ Responsibility	Supervision	Monitoring	Duration
	<p>sexual harassment (SEA/SH) and gender-based violence (GBV) at workplace.</p> <ul style="list-style-type: none"> <li>▪ The project level GRM will include specific procedures for GBV, SEA/SH including confidential reporting and ethical documentation of GBV cases. Information about the GRM will be displayed prominently and disseminated during consultation sessions so project beneficiaries/affected people have information in case of complaints.</li> <li>▪ The contractor will establish a workers' complaints system for workers and staff.</li> <li>▪ Contractors to conduct an orientation session for their workforce on the GRM prior to the start of construction work. GRM also addresses child labor, GBV and sexual harassment related grievances.</li> </ul>				implementation
Chance find procedures	<ul style="list-style-type: none"> <li>▪ Stop the activities in the area of the chance find.</li> <li>▪ Delineate the discovered site or area (e.g. fencing).</li> <li>▪ Secure the site to prevent any further disturbance, damage or loss. In cases of human remains, arrange for a guard to watch the site until the MoE take over.</li> <li>▪ Prohibit the collection of any object by any person.</li> <li>▪ MoE will notify the Ministry of Tourism and Antiquities (MoTA) within 24 hours.</li> <li>▪ Project works can resume only after instruction is provided from the MoTA.</li> </ul>	Contractor	Supervision Engineer	Supervision Engineer/ESO	During excavation
Temporary use of private land (during construction)	Avoid any use of private land during construction, except of presence of legal document between contractor and citizen to use the land for short time	Contractor	Supervision Engineer	Supervision Engineer/ESO	Throughout the sub-project implementation
Low risk of uprooting trees	For trees that can be replanted, the contractor agree with the school administration on relocating those trees, replant at location selected by school administration	Contractor	Supervision Engineer	Supervision Engineer/ESO	Throughout the sub-project implementation
<b>Operational Phase</b>					

Potential Impact	Mitigation Measures	Operation/ Responsibility	Supervision	Monitoring	Duration
Improper disposal of generated wastewater	<ul style="list-style-type: none"> <li>▪ Ensure proper connection to wastewater network and if septic tank is used, proper disposal is maintained, regularly check for leakages</li> <li>▪ Inspect any improper collection/disposal</li> </ul>	KG/School administration	KG/School administration	EQA	Throughout the sub-project lifetime
Generation of solid Waste	<ul style="list-style-type: none"> <li>▪ Ensuring proper solid waste management procedures by the KG/School management.</li> <li>▪ This includes handling, storage, transport and disposal of the generated solid waste in the KGs to nearest legal solid waste landfill.</li> </ul>	KG/School administration	KG/School administration	EQA	Throughout the sub-project implementation
<ul style="list-style-type: none"> <li>▪ Sustainability of the Project</li> <li>▪ Failure to sustain safe and good condition of the sub-project due to damage, misuse, and lack of maintenance</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ensure technical sustainability by proper training and capacity building of the staff of the General Directorate of Buildings “DG of the MOE.</li> <li>▪ Use and maintain checklists and monitoring tools to conduct frequent checks on sub-project conditions</li> </ul>	MoE	KGs/Schools administration	MOE	Throughout the sub-project lifetime

## **7.2. Environmental and Social Management Organizational Structure**

The environmental and social management structure will have roles and responsibilities at the level of the MoE PCU, Supervisory Consultant and the Contractor.

### **MOE PCU**

The MoE PCU has as part of its team an Environmental and Social Officer (ESO) who will oversee the environmental, social and health and safety aspects of the project. The ESO will ensure that the World Bank ESF and standards are adhered to where applicable, and that the Contractor prepare and implement the Environmental and Social Management Plan C-ESMP. The ESO will prepare the Month progress report, and the PCU will submit a quarterly E&S Progress Report to the World Bank.

### **Supervisory Consultant Firm**

The Supervisory Consultant Firm will have as a member of their team a Environmental and Social and Environmental specialist who will have the responsibility of ensuring compliance with the environmental, social, health and safety requirements relating to the project. This person will be responsible for overview and provide direction as may be required to the Contractor (and the MoE PCU) to ensure the project meets its ESHS objectives and complies with the sub-projects ESMP. The Supervisory Consultant Firm will be required to monitor the Contractor's ESHS performance against the national requirements and this ESMP, as well as the Contractor's C-ESMP.

The ESHS related services to be provided by the Supervisory Consultant Firm include but are not limited to:

- Review and approval of the Contractor's C-ESMP;
- Undertake audits and inspections of Contractor's accident logs, monitoring findings and other ESHS related documentation, as necessary, to confirm the Contractor's compliance with ESHS requirements;
- Agree on remedial action/s and their timeframe for implementation in the event of a non-compliance with the Contractor's ESHS obligations;
- Ensure appropriate representation at relevant meetings including site meetings, and progress meetings to discuss and agree on appropriate actions to ensure compliance with ESHS obligations;
- Check that the Contractor's actual reporting (content and timeliness) is in accordance with the Contractor's contractual obligations;
- Review, critique and consult in a timely manner with the Contractor on the ESHS documentation (including regular reports and incident reports) regarding the accuracy and efficacy of the documentation;
- Provide appropriate training to contractor's workers when necessary or required by the PCU; and
- Undertake field inspections of the construction site to verify the Contractor's compliance with the C-ESMP and promptly communicate to the PCU any serious deviations.

Contractor

The Contractor will also be required to employ a suitable qualified and experienced personnel as an Occupational Health and Safety Officer, with the responsibility of ensuring compliance with the environmental, social, health and safety requirements. The responsibilities of this individual is detailed in the OHS Manual prepared by the MoE and disclosed at the Ministry website (<http://www.palpcu.ps/files/ECD-%20OHS%20Manual%20%20QA%20final%20.pdf>) including:

- Prepare the Contractor's Environmental and Social Management Plan;
- Conduct training of workers in health, safety and environment requirements, including health and safety induction prior to commencement of work onsite and regular tool box sessions;
- Ensure compliance with the EQA requirements;
- Liaise with the ESO and Supervisory Consultant Firm on compliance;
- Implement the C-ESMP;
- Conduct site inspections, audits and permanent supervision at the construction site to ensure adequate and timely implementation of, and compliance with, the C-ESMP;
- Address any grievances of workers and stakeholders;
- Report on ESHS compliance; and
- Oversee the clean-up and decommissioning of the site on the completion of works.

### **7.3. Contractor's Environmental and Social Management Plan (C-ESMP)**

The Contractor shall prepare any additional site Specific MSIPs as are necessary to manage the ES risks and impacts of ongoing Works including OHS Plan, Traffic Plan, Waste management procedures, and the mitigation measures included in the ESMP, cumulatively account for the Contractor's Environmental and Social Management Plan (C-ESMP) that is aimed to mitigate issues pertinent to the construction of the sub-projects. This ESMP shall be submitted to the Consultancy Firm and MoE PCU within an acceptable duration stipulated in the bidding document, then to be submitted for the World Bank approval prior to the commencement of works where required. Once approved, the C-ESMP is expected to be implemented during the construction period. Preparation of the C-ESMP shall be guided by this ESMP, relevant national standards and guidelines and the World Bank Environmental, Health and Safety (EHS) Guidelines.

### **7.4. Code of Conduct (CoC) for Workers**

The CoC in Arabic Language was prepared by MoE PCU for project workers (Annex4) to guide workers behavior onsite during the conduct of works. Workers will sign the Codes of Conduct and will be informed about its provisions and the potential penalties in case of violation of such provisions. The Code of Conduct shall include:

- Compliance with applicable laws, rules, and regulations
- Compliance with applicable health and safety requirements (including utilizing of prescribed personal protective equipment, preventing avoidable accidents and a duty

to report conditions or practices that pose a safety hazard or threaten the environment).

- The use of illegal substances.
- Interactions with community members (for example to convey an attitude of respect and non-discrimination).
- Sexual harassment (for example to prohibit use of language or behavior, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate).
- Violence or exploitation (for example services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior).
- Protection of students/children (including prohibitions against abuse, defilement, or otherwise unacceptable behavior with students/children, limiting interactions with students/children, and ensuring their safety in the project area).
- Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas or school facilities).
- Respecting reasonable work instructions (including regarding environmental and social norms).
- Protection and proper use of property (for example, to prohibit theft, carelessness or waste).
- Penalties in case of violation of the Code.
- Duty to report violations of the Code.
- Non retaliation against workers who report violations of the Code, if that report is made in good faith.

The contractor shall ensure that workers:

- Received and signed the CoC;
- Had the code explained to them;
- Acknowledged that adherence to this Code of Conduct is a condition of employment; and
- Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.
- Received training on appropriate behavior and sanctions for non-conformance.

The Contractor is responsible to implement all the rules in the CoC (Annex 4). The Consultancy Firm and MoE PCU will be responsible to supervise the implementation of the CoC in efficient manner.

### **7.5. ESHS Monitoring and Reporting**

To ensure that the management and mitigation measures are effective, a multi-layer monitoring structure will be implemented and well documented. Environmental monitoring will be conducted throughout the construction period by MoE PCU, the Supervisory Consultants and the Contractor.

## MoE PCU

MoE PCU has ESO to oversee the environmental, social, health and safety aspects of the project. The ESO will ensure that the World Bank ESF and Policies are adhered to where applicable and that the Contractors comply with the national requirements and implement the C-ESMP. The ESO will visit the site at least once per week to check on the Contractor's ESHS performance and compliance. The ESO will conduct unannounced visits as well as joint visits with the Supervisory Consultancy Firm and Contractor's ESHS Personnel. MOE PCU have to declare to the bank accident with injury or lethal accident within 24h after being informed.

## The Consultancy Firm

The Supervisory Consultant Firm Construction Engineers and Environmental and Social Specialist will also monitor overall works performance and will oversee the ESHS aspects of the sub-projects on a day-to-day basis, including identification of non-compliance and recommendations of corrective actions. The Consultancy Firm will prepare a monthly report detailing the ESHS performance by the Contractor and submit it to MoE PCU.

## Contractor

The Contractor is required to monitor the implementation of the mitigation measures to ensure that the works do not negatively affect the environment and that the health and safety of workers and nearby community are not compromised, and that activities are being carried out in accordance with the C-ESMP. Monitoring is the responsibility of the Contractor's OHS Officer and Construction Manager. Once non-compliances are detected corrective actions are to be implemented.

During the construction phase, the Contractor will be responsible for continuously monitoring of environmental and social impacts at the construction site. And to report on environmental compliance at the Monthly Progress Meetings and in the Monthly Progress Reports. The Contractor is also required to report on any environmental or health and safety incidents and accident which might occur. The Contractor is expected to submit a report to the Consultancy Firm on ESHS performance on a monthly basis. The ESHS monthly report should include but not limited to the following:

- Environmental incidents or non-compliances observed, and corrective actions taken with regards to contract requirements, including waste management, contamination, noise and dust control, traffic management, etc.;
- Health and safety incidents, accidents, injuries and all fatalities that require treatment and actions taken to improve conditions. Information on number of workers, work hours, PPE provided and usage, and worker violations and follow-up actions taken (if any) ;
- C-ESMP implementation progress, including implementation of the management and mitigation measures outlined in the plan, effectiveness of the measures being implemented, any emerging ESHS issue and any adjustments required (if any); and Grievances by workers and community, including grievances received, how resolved, those unresolved and plan for resolving these. In addition to the monthly report, the Contractor shall also notify the consultancy Firm and MoE PCU within 24 hours of any incident or accident related to the project or that has an impact on it, and that has or

could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example, occupational accidents that could result in death or serious injury, cases of GBV/SEA/SH or violence against minors, injuries, falls, vehicle accidents and electrocution.

Annex 2 provides guidance on the areas to be monitored and suggested environmental and social monthly report format.

### **7.6. Grievance Mechanism**

The grievance/complaint mechanism in Palestine is ensured by the grievance bylaw that was approved by the Cabinet of Minister. Also, the WB stakeholder engagement plan (SEP) requires implementing a grievance mechanism (GM) to receive and facilitate resolution of affected peoples' grievances related to the project's performance, including environmental and social impacts and issues.

The MoE PCU described the GM in the ESMF for the ECD project<sup>9</sup>. The manual contains the following: 1) Methods for filling and registering the complaints 2) Notifying and closing the complaint 3) Additional dispute resolution scheme 4) Reporting.

The Grievance Mechanism that was developed for the original project shall remain accessible and functional to receive and facilitate the resolution of concerns and grievances in relation to the AL Ameen, Al nasreh, Al Huda and Um salamah subprojects in accordance with ESS10.

The Consultancy Firm shall keep a log for grievances and how complaints were resolved within a stipulated timeframe that for 2 weeks according to the GM Manual and then produce monthly reports for the ESO in MoE. Grievances/feedback reports include data on numbers of grievances/feedback received, compliance with business standards, issues raised in grievances/feedback, trends in grievances/feedback over time, the causes of grievances/feedback, whether remedial action was warranted, and what redress was provided.

MOE shall also make sure that the GM and the complaint system is applied properly according to the related laws and regulations and grievances/feedback made public periodically. The project's ESO will be responsible for receiving complaints related to children, and women who may be exposed to violence, sexual exploitation and abuse and sexual harassment. A GM email address<sup>10</sup> will be communicated to project's affected parties during consultations and through different stakeholder engagement methods. The ESO will be responsible for handling complaints with high priority, seriousness, data protection and privacy.

Annex 3 provides templates for GM to be used by the project beneficiaries.

### **7.7. Stakeholders Engagement**

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<sup>9</sup> <http://www.palpcu.ps/files/ESMF-ECD-%20Environmental%20and%20Social%20Management%20Framework.pdf>

<sup>10</sup> <https://cs.pmo.gov.ps/Users/Login.aspx?Redirect=~%2fdefault.aspx>) and a telephone number (+970-2-29833229

### **7.7.1 General Public Consultation**

The public consultation workshop was carried out virtually on 4th of May 2021. Beneficiaries and stakeholders involved in the stakeholder meeting included teachers and parents of students at schools, nearby affected people from the community, MOE including D.G. of Buildings at MOE.

The ESO informed and discussed with relevant stakeholders the GM system that has been prepared for the project as described in the project SEP and detailed in the GM manual. The ESO informed the participants of the available tools for filing complaints. MOE will prepare a GM 'user' friendly format in Arabic language and disclose it on the ministry's website.

Participants highlighted the importance and the urgency of the project mainly due to the insufficient number of pre-school classrooms in the region. The ESO explained to participants the E&S potential risks and mitigation measures asked whether they have any clarifications or questions. Participants did not have any concerns regarding the Environmental and Social issues as most of them are aware of such measures from previous similar projects.

The PCU informed participants that a site-specific consultation for each school will be conducted separately.

### **7.7.2 Site Specific Consultations**

The Specific consultation workshop was held virtually on February 20, 2022 with the beneficiaries and stakeholders of the four schools. Participants included school headmasters and teachers, civil defense, students, parents and residents living in the nearby area. Also attended the meeting, the Ministry of Education staff, represented by the General Director of Buildings, the Head of the Engineering Projects Preparation section and the Engineering section in the Directorate of Education in Yatta.

MoE displayed a presentation describing the ECD project components and goals and a short description of each subproject. Description included general information of activities, location, areas, Ariel view for subprojects sites, field pictures, construction phases and expected time of start and completion of works, environment and social impacts/risks that may occur during construction and the mitigation measures implemented. The GM system was described and discussed with participants.

MoE asked if there are any questions, concerns and their opinion to take it into consideration through project preparations? Participants welcome the project and had no specific concerns as they are familiar with impacts and expressed their willingness to support the project and ensure its success. "There were previous rehabilitation projects for the school all of which were during the school's official school hours such as painting and general maintenance, and there was cooperation from the school and its staff to complete such projects successfully" that's what a female participant from Al Huda subprojects said. Another participant mentioned that "we trust that, as long as this project is within closed borders and separated from the school

yard, there will be no obstacles to implementation, and the school staff and the local community are ready to help to avoid problems and complaints”.

The director of Al-Ameen School also added that adding one classroom is not enough since these targeted areas are highly populated. He added that, Al-Ameen School has 800 students and annually receives 150 students in the first grade. The Ministry’s answer was that it provides a KGs classroom for such areas to help parents who cannot send their children to private kindergartens.

Major Muhammad Nassar in the Civil Defense also asked about the obligation to present the design plans to the Civil Defense to examine the conditions of public safety. The Ministry responded that the plans, before being approved, should be approved by the Civil Defense, which is an essential part of the licensing procedures.

The directorate’s engineer also confirmed that transporting, uploading and downloading of construction materials will be done outside the school’s working hours, and that the site will be closed to avoid any accidents.

The MOE concluded the meeting by saying that it seeks to meet the needs of all the governorates of the country, and there will be other similar projects in the future in Yatta city.

## **8. Conclusion**

The construction of the four KG2 sub-projects at Al Ameen, Al Nasreh, Um Salamah and Al Huda schools in Yatta is not expected to have significant environmental and social impact. Most of the potential impacts are related to the construction phase including: (i) public and workers safety caused by unsafe work practices and/or uncontrolled access to construction sites including health and safety risk due to COVID-19, (ii) potential disruptions to learning caused by noise and air-borne pollutants and/or reduced access to classrooms if works are undertaken when schools are operational, (iii) contamination from improper waste management; (iv) risks related to labor and working conditions; and (iii) risk of exposure of students, women and community to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) by project workers. The impacts are localized, low and possible to mitigate or prevent. There are no known physical or cultural resources within the project area. In addition, there are no structures or individuals occupying the site which would require resettlement or compensation.

The potential impacts can be mitigated by ensuring the Contractor implements a stringent Health, Safety and Environmental and Social Management System onsite and there is adequate oversight by the MoE PCU and the Consultancy Firm.

The Contractor is required to implement the mitigation and management measures established in this ESMP and the C-ESMP and is required to cover all cost relating to the environmental, social, health and safety requirements, including the provision of materials, equipment and supplies such as all appropriate and required PPEs to ensure compliance. These requirements will be clearly communicated in the Bidding Document to ensure that potential contractors are aware of the requirements and include the necessary resources including personnel and funds

to ensure compliance. The ESMP will form part of the Contract Document with the selected contractor.

## Annexes

### Annex 1: Land Ownership and Photos

A: AlAmeen School

1. Ownership for Al Ameen Land. (Source: Yatta Municipality & D. J of Building)

Palestine National Authority  
Ministry of local Government  
Yatta Municipality

Tel 02-2279502  
02-2279394  
Fax 02-2279606



حالستة الوطنية الفلسطينية  
وزارة الحكم المحلي  
بلدية يطا

تلفون 02-2279502  
02-2279394  
فكس 02-2279606

التاريخ : ٢٠٢١/٠٥/١٧

لمن يهمه الأمر

الموضوع : بيان ملكية

تحية طيبة وبعد ،،،

بالإشارة إلى الموضوع أعلاه نعلمكم حسب سجلات بلدية يطا فإن قطع الأراضي التالية مسجلة كما يلي :

رقم الحوض	رقم القطعة	الموقع	المالك	ملاحظات
٢٨	١	بيار العروس/رقعة	لجنة المعارف المحلية	مدرسة الناصرة
٧	١	العمريه / المزرعه	بلدية يطا	مدرسة الامين والمعتصم والمامون
٤	٧٤	حي المدارس	لجنة المعارف المحلية	مدرسة ام سلمه والنظامية
١٤	+١٦٦+١٦٥+١٦٤+١٦١ +١٧٠+١٦٩+١٦٨+١٦٧ +١٧٤+١٧٣+١٧٢+١٧١ +٢٧٩+٢٤٥+١٨٥+١٨٥ ٢٨٠	البلدة القديمة/شارع السلام	لجنة المعارف المحلية	مدرسة الهدى

واقبلوا فانق الاحترام



2. Photos from the Field Site Visits- Al Ameen



## B: AlNasarah School

### 3. Ownership for Al Nassreh Land

Palestine National Authority  
Ministry of local Government  
Yatta Municipality

Tel 02-2279502  
02-2279394  
Fax 02-2279606

التاريخ : ٢٠٢١/٠٥/١٧

بسم الله الرحمن الرحيم



حاملطة الوطنية الفلسطينية  
وزارة الحكم المحلي  
بلدية يطا

02-2279502  
02-2279394  
02-2279606

تلفون  
فاكس

لمن يهمه الأمر

الموضوع : بيان ملكية

تحية طيبة وبعد ،،،

بالإشارة إلى الموضوع أعلاه نعلمكم حسب سجلات بلدية يطا فبان قطع الأراضي التالية مسجلة كما يلي :

ملاحظات	المالك	الموقع	رقم القطعة	رقم الحوض
مدرسة الناصرة	لجنة المعارف المحلية	بيار العروس/رقعة	١	٢٨
مدرسة الامين والمعتصم والمامون	بلدية يطا	العمريه / المزرعه	١	٧
مدرسة ام سلمه والنظامية	لجنة المعارف المحلية	حي المدارس	٧٤	٤
مدرسة الهدى	لجنة المعارف المحلية	البلدة القديمة/شارع السلام	+١٦٦+١٦٥+١٦٤+١٦١ +١٧٠+١٦٩+١٦٨+١٦٧ +١٧٤+١٧٣+١٧٢+١٧١ +٢٧٩+٢٤٥+١٨٥+١٨٥ ٢٨٠	١٤

واقبلوا فانق الاحترام



4. Photos for Al Nasreh Field Site Visit



## C: AlHuda School

### Ownership for Al Huda Land

Palestine National Authority  
Ministry of local Government  
Yatta Municipality

Tel: 02-2279603  
02-2279304  
Fax: 02-2279606

بسم الله الرحمن الرحيم



حاصلتها الوطنية الفلسطينية  
وزارة الحكم المحلي  
بلدية يطا

تلفون: 02-2279502  
02-2279304  
فكس: 02-2279606

التاريخ: ٢٠٢١/٠٥/١٧

لمن يهمة الأمر

الموضوع: بيان ملكية

تحية طيبة وبعد ...

بالإشارة إلى الموضوع أعلاه نعلمكم حسب سجلات بلدية يطا فإن قطع الأراضي التالية مسجلة كما يلي:

ملاحظات	المالك	الموقع	رقم القطعة	رقم الحوض
مدرسة الناصرة	لجنة المعارف المحلية	بيار العروس/رقعة	١	٢٨
مدرسة الامين والمعصم والمامون	بلدية يطا	العريه / المزرعه	١	٧
مدرسة ام ستمه والنظامية	لجنة المعارف المحلية	حي المدارس	٧٤	٤
مدرسة الهدى	لجنة المعارف المحلية	البلدة القديمة/شارع السلام	+١٦٦+١٦٥+١٦٤+١٦١ +١٧٠+١٦٩+١٦٨+١٦٧ +١٧٤+١٧٣+١٧٢+١٧١ +٢٧٩+٢٤٥+١٨٥+١٨٥	١٤
			٢٨٠	

واقبلوا فائق الاحترام



### Photos from the Field Site Visits- Al Huda



## D: Um Salama School

### Land ownership for Um Salamah school

Palestine National Authority  
Ministry of local Government  
Yatta Municipality



حالة السلطة الوطنية الفلسطينية  
وزارة الحكم المحلي  
بلدية يطا

Tel 02-2279502  
02-2279394  
Fax 02-2279606

تلفون 02-2279502  
02-2279394  
فكس 02-2279606

التاريخ : ٢٠٢١/٠٥/١٧

لمن يهمه الأمر

الموضوع : بيان ملكية

تحية طيبة وبعد ،،،

بالإشارة إلى الموضوع أعلاه نعلمكم حسب سجلات بلدية يطا فإن قطع الأراضي التالية مسجلة كما يلي :

رقم الحوض	رقم القطعة	الموقع	المالك	ملاحظات
٢٨	١	بيار العروس/رقعة	لجنة المعارف المحلية	مدرسة الناصرة
٧	١	العمريه / المزرعه	بلدية يطا	مدرسة الامين والمعتصم والمامون
٤	٧٤	حي المدارس	لجنة المعارف المحلية	مدرسة ام سلمه والنظامية
١٤	+١٦٦+١٦٥+١٦٤+١٦١ +١٧٠+١٦٩+١٦٨+١٦٧ +١٧٤+١٧٣+١٧٢+١٧١ +٢٧٩+٢٤٥+١٨٥+١٨٥ ٢٨٠	البلدة القديمة/شارع السلام	لجنة المعارف المحلية	مدرسة الهدى

واقبلوا فانق الاحترام



Photos from the Field Site Visits for Um Salamah



**In order to protect the existing 3 trees, the contractor will be required to uproot the trees and replant them in a location that is agreed upon by the school administration and MoE that own the land and trees.**

## Annex 2: Environmental and Social Monitoring Templates

### Site Visit Report

Project Location: .....					
Project Name:.....					
Date:.....					
#	Impact to check	Yes	No	Remarks	Mitigation measure/s carried out
1	Damage to existing public services				
2	Noise/alarm generation				
3	Dust spreading out				
4	Odor emission				
5	Traffic problems (hindering, detours, closure ...etc.)				
6	Solid Waste Services problems				
7	Sewerage Services problems				
8	Student and pedestrians' safety endangered				
9	Stagnant water pools				
10	Landscape / aesthetic element/s deteriorated				
11	Natural Resources negatively affected				
12	Biodiversity & Wildlife threatened				
13	Heritage and archaeological sites negatively affected				
14	Workers safety and health considered				
15	Workers commitment to OHS (vests, gloves, etc.)				
16	Working machines suitability				
17	Presence of Toxic and Hazardous materials				
18	Documentation of community concerns/complaints				
<p>22. Comments:</p> <p>.....</p> <p>.....</p>					
<p>23. Recommendations:</p> <p>.....</p> <p>.....</p>					
<p>Environmental and Social Officer (ESO) Signature .....</p>					

Date.....

Suggested Environmental and Social Monthly Monitoring Report Format

No.	Key Environmental and social issues	Environmental and Social mitigation measure taken	Implementation and monitoring of ESMP	Status of compliance	Corrective actions needed/Penalties

Complaints received

.....  
 .....

Status of complaints

.....  
 .....

22. Comments: ..... .....
23. Recommendations: ..... .....
Environmental and Social Officer (ESO) Signature ..... Date.....

Project Location: ..... Project Name: ..... Date: .....				
#	Impact to check	Yes	No	Remarks
1	<b>System issues</b>			
	Does the project invite grievance feedback?			
	Does the grievance mechanism have clarity, procedures, system for keeping complaints and recording feedback, and system for protecting confidentiality?			

<b>2</b>	<b>Staff management</b>			
	Is there a grievance manual for workers?			
	Do the grievance procedures provide guidance on grievance feedback, and remedies?			
	Are adequate resources allocated for the grievance mechanism to function effectively?			
	Does MOE provide training on grievance management to staff?			
<b>3</b>	<b>Communication to grievance mechanism users</b>			
	How users submit grievance feedback?			
<b>4</b>	<b>Feedback/grievance recording</b>			
	Are all feedback/grievances recorded?			
<b>5</b>	<b>Business standards</b>			
	Are there business standards in place for the process and timing with which grievances/feedback are dealt with?			
	Is there a quality control system?			

### Annex 3: GM Templates (Arabic)

#### مشروع تنمية الطفولة المبكرة

#### طلب تقديم شكوى

التاريخ:.....

رقم الشكوى: .....

القسم الأول: حول المشتكى/ة

اسم مقدم/ة الشكوى الرباعي:

رقم الهوية:

اسم المؤسسة مقدمة الشكوى:

ولي

وصي

وكيل

شخصي

الصفة: اعتباري

انثى

ذكر

الجنس (للأفراد فقط):

تاريخ الميلاد: / /

العمر (للأفراد فقط): .....

رقم الهاتف:

البريد الإلكتروني:

القسم الثاني: حول الشكوى

موضوع الشكوى:

.....  
.....

الجهة المقدم بحقها الشكوى:

.....  
.....

لا

هل الشكوى منظورة أمام القضاء: نعم

لا

هل تقدمت بشكوى في ذات الموضوع سابقا: نعم

- اسم الجهة المقدم بحقها الشكوى سابقا: ..... تاريخ التقديم: ...../...../.....

لا

- هل تلقيت ردا على الشكوى السابقة: نعم، تاريخ الرد: ...../...../.....

وقائع الشكوى:

القسم الثالث: مرفقات الشكوى (وثائق ومستندات)

- 1- .....
- 2- .....
- 3- .....

أقر وأصرح أنا مقدم/ة الشكوى،..... بأن المعلومات والبيانات والمرفقات الواردة أعلاه هي معلومات وبيانات ومرفقات صحيحة وحقيقية والنزح واطعهد بتحمل كامل المسؤولية القانونية فيما لو تبين خلاف ذلك في أي وقت من الأوقات أو إذا تبين أن الشكوى المقدمة من قبلي كيدية.

وعليه أوقع

توقيع و/أو بصمة مقدم/ة الشكوى: ..... تاريخ تقديم الشكوى: / /

توقيع و/أو بصمة الشخص الذي استعان به مقدم الشكوى في كتابة الشكوى: .....

اسم الموظف/ة مستلم/ة الشكوى: .....

توقيع الموظف/ة مستلم/ة الشكوى: ..... تاريخ استلام الشكوى: / /

القسم الرابع: (خاص لاستخدام مسؤول الشكاوى)

التوصية حول الشكوى: .....

.....

.....

قبول الشكوى

رفض الشكوى

- مبررات رفض الشكوى: .....

.....

.....

التاريخ:

مسؤول الشكاوى

التوقيع.....

مشروع تنمية الطفولة المبكرة

اشعار استلام شكوى

التاريخ:.....

اسم المشتكي:.....

رقم الشكوى:.....

موضوع الشكوى:.....

مرفقات الشكوى (إن

وجد):.....

وسيلة الرد على

الشكوى:.....

اسم الموظف/ة

المسؤول/ة:.....

توقيع الموظف/ة

المسؤول/ة:.....

الختم:

مشروع تنمية الطفولة المبكرة

بطاقة مراجعة

بطاقة مراجعة

اسم مقدم الشكوى

الرباعي:.....

العنوان:

.....

.....

رقم

الشكوى:.....

موضوع

الشكوى:.....

تاريخ تقديم

الشكوى:.....

تاريخ المراجعة:..... التاريخ.....

الساعة.....

اسم الموظف/ة

المسؤول/ة:.....

توقيع الموظف/ة

المسؤول/ة:.....

هاتف وحدة/قسم

الشكاوى:.....

الختم ان وجد:

## مشروع تنمية الطفولة المبكرة

### ابلاغ رد لمقدم الشكوى

التاريخ:.....

الأخ المواطن / الأخت المواطنة/ السادة مؤسسة.....المحترم/ المحترمة/ المحترمين

الموضوع: ابلاغ رد حول الشكوى رقم ( )

تحية طيبة وبعد،

تهديكم وحدة/قسم الشكاوى في ..... أطيب التحيات، وبناء على متابعة الشكوى رقم ( )  
( المقدمة من طرفكم بتاريخ...../...../..... وموضوعها .....، نود ابلاغكم بالرد الاتي:

.....  
.....

مع فائق الاحترام والتقدير

مسؤول الشكاوى

GRM System Log.

ملاحظات	طبيعة الرد	جهة الاختصاص	طريقة الاستلام	تاريخ اغلاق الشكوى	جهة المتابعة	موضوع الشكوى	تفاصيل حالة الشكوى	حالة الشكوى	تاريخ تقديم الشكوى	مقدم الشكوى	رقم الشكوى كما في النظام	الرقم
							قيد المتابعة	مقبول				1
							متعثرة	مرفوض				2
							مرفوض	مقبول				3
							مغلق	مقبول				4
												5
												6
												7
												8
												9
												10
												11
												12

## Annex 4 Code of Conduct (Arabic)

### مدونة قواعد السلوك وأخلاقيات العمل

#### مقدمة

يأتي الاهتمام بمواثيق سلوك وأخلاقيات العمل والتشغيل كأحد مداخل تطوير الاداء للعاملين واصحاب العمل. إن إعداد مدونة قواعد السلوك وأخلاقيات العمل من شأنه تعزيز قيم والممارسات الايجابية في العمل ، وتعد مدونة السلوك إطاراً عاماً يجب على العاملين في المشروع التقيد به والعمل بمقتضاه، فهي مدونة تلقي الضوء على المعايير و الاخلاق والقيم التي يجب أن يتحلى بها العامل أثناء أداء واجباته، ومن ثم فهي قواعد ستسهم على نحو فاعل في الارتقاء بمستوى جودة الاداء والارتقاء به. إن هذه المدونة تشكل جزءاً من مقتضيات العمل في المشروع بالتركيز على اجراءات الوقاية والسلامة والصحة العامة المتعلقة بكوفيد 19، ويجب تطبيقها في كل اوقات العمل وطوال فترة التشغيل، وسوف يتم تزويد كل عامل بنسخة منها، ليقرأها ويعمل بموجبها.

#### أولاً: المبادئ الأساسية لمدونة السلوك وأخلاقيات العمل

إن جودة الاداء ونجاح العمل تتوقف على الالتزام بقواعد السوك العامة واخلاقيات العمل، والتصرف بطريقة عادلة وصادقة كأفراد مسؤولين اجتماعياً انطلاقاً من ايماننا الراسخ بمسؤوليتنا الاجتماعية التي لها أثراً إيجابياً كبيراً على المشاريع التي نعمل بها. ولتحقيق هذا، يجب علينا احترام هذه المبادئ الأساسية:

**النزاهة والامانة** : الإيمان بتعزيز التصرف بأمانة في جميع العلاقات مع التقيد الصارم بجميع القوانين المعمول بها ، احترام كرامة كل شخص والحفاظ على سلامتهم .

**الشفافية**: الاحترام المتبادل والحوار والشفافية هي أساس العلاقة مع اصحاب العمل والسلطات ذات العلاقة ، والتي تتوافق مع مبادئ التعاون والصدق والانفتاح.

**الموضوعية والإستقلالية** : العمل بموضوعية واستقلالية وتجنب أي نوع من أنواع الفساد أو تضارب المصالح الذي قد يؤثر على اتخاذ القرارات المتعلقة بالعمل.

**المسؤولية**: توفير بيئة عمل آمنة وصحية للعمال ، واحترام الحقوق والتقيد بالواجبات من مقتضى المسؤولية ، واحترام المجتمعات التي نعمل فيها.

#### ثانياً: قواعد السلوك وأخلاقيات العمل

##### القسم الاول : الحقوق العامة

- يلتزم العامل بتأدية عمله بإخلاص وأمانة وبالمحافظة علي أسرار العمل وأدواته، ويعتبر مسؤولاً عن الأدوات التي في عهده و عليه الحفاظ عليها، وفي حالة وجود ظرف خارج عن ارادته او قوة قاهرة، فان العامل لا يعتبر مسؤولاً عن خلل الأدوات أو ضياعها.
- على العامل أن يلتزم بأخلاقيات العمل والحفاظ على خصوصية السكان والعمال في منطقة العمل، دون الاشتباك معهم أو التسبب بأي أذى لهم بأي شكل كان. ويجب الامتناع عن المشاركة في أي عنف بدني او لفظي لأي من العاملين أو السكان.
- على العامل التقيد بساعات العمل المطلوبة، وكذلك التقيد والامتنال بالمهام المكلف بها.
- على العامل الإلتزام بإجراءات السلامة المتبعة في الموقع، خاصة عند استخدام الآلات الخطرة، وأي إجراءات إضافية يتم طلبها من قبل المقاول أو الوزارة.
- يجب على العامل الإبلاغ فوراً عن أي أمراض مزمنة يعاني منها أو عند الشعور بالإعياء، وعن أي عقاقير يتلقاها العامل.
- الإمتناع عن التسبب بأي نوع من المضايقات سواء اللفظية المباشرة او غير المباشرة لأي شخص أثناء فترة العمل، وخاصة من فئة النساء والأطفال وذوي الاحتياجات الخاصة.
- من حق العامل أن يوقع عقد عمل مع صاحب العمل علي أن يكون باللغة العربية، وذلك لحفظ حقوق العامل ، علماً بأن عقد العمل يجب أن يتضمن : الأجر، نوع العمل، مكانه ومدته، ساعات وأوقات العمل، كما ويجب ان يتضمن العقد الاجراءات الصحية وشروط الوقاية المتعلقة ب كوفيد 19، والتي اقرتها وزارة الصحة الفلسطينية، و يجب أن يوقع العقد من قبل صاحب العمل والعمال بحيث يحتفظ العامل بنسخة أصلية من العقد.
- علي صاحب العمل أن يلتزم بالتأمين على جميع عماله عن إصابات العمل لدي الجهات المرخصة في فلسطين.

- يجب أن تتخلل ساعات العمل اليومي فترة أو أكثر لراحة العامل لا تزيد في مجموعها عن ساعة مع مراعاة ألا يعمل العامل أكثر من خمس ساعات متصلة دون تخصيص وقت للراحة.
- التقيد بأوقات العمل وتكريس اوقات العمل للقيام بالمهام والواجبات المتعلقة بطبيعة العقد ، كما نص عليها عقد العمل.
- ضمان حق العامل في التظلم او الشكوى من اي انتهاك لحقه او من اتخاذ قرار خاطيء بحقه.

#### القسم الثاني: حماية حقوق النساء

- معاملة النساء باحترام بغض النظر عن العرق أو اللون أو اللغة أو الدين أو الرأي السياسي أو غير السياسي أو الأصل أو الإعاقة أو أي وضع آخر.
- عندما يكون لدى المرأة العاملة مخاوف أو شكوك فيما يتعلق بأعمال العنف القائم على النوع الاجتماعي من قبل اصحاب العمل او اي طرف ذو علاقة بالعمل، يجب عليها الإبلاغ عن هذه المخاوف وفقاً لإجراءات الشكاوى المعتمدة في المشروع. على ان يتم التعامل مع هذه الشكاوي بخصوصية كبيرة للحفاظ على كرامة المشتكية.
- يجب توفير الحماية للنساء وتهيئة أماكن امنة في العمل للنساء وخاصة الحوامل والتأكد من عدم نقل أي امرأة حامل بشكل غير صحيح ، والعمل على ازالة او منع تعرض النساء الحوامل للمخاطر.
- يجب توفير أماكن للنظافة الشخصية لاستخدامها من قبل النساء العاملات بعد الانتهاء من العمل. وايضا توفير مرافق صحية ( دورات مياه) خاصة بالنساء في اماكن العمل، ويجب أن يتم تعقيم هذه الأماكن بشكل يومي.
- يجب تنفيذ لقاءات توجيهية قبل بدء العمل في الموقع للتأكد من أن الجميع على دراية بقواعد السلوك الخاصة بالعنف القائم على النوع الاجتماعي والتحرش الجنسي.

#### القسم الثالث : حماية حقوق ذوي الاعاقات

- يلتزم اصحاب العمل بتهيئة البيئة الملائمة لاحتياجات ذوي الاحتياجات الخاصة وتوفير تسهيلات الحركة والتنقل في اماكن العمل.
- عدم التمييز بحق المعاقين والمعاقات في العمل، واحترام حقهم / هن في اختيار نوعية الاعمال التي تناسب قدراتهم /تهن ، واهتماماتهم/هن واحتياجاتهم/هن.
- الالتزام بتوفير خدمات ومرافق صحية مواءمة لاستخدامات ذوي الاعاقة الحركية في مواقع العمل.

#### القسم الرابع : الصحة والسلامة المهنية

- على العامل التقيد بتطبيق شروط واجراءات الصحة والسلامة العامة الصادرة عن وزارة الصحة الفلسطينية ، والالتزام بقواعد السلامة والصحة المهنية في العمل.
- على صاحب العمل تقديم الإسعافات الأولية اللازمة للعامل في حال الاصابة ونقله إلي اقرب مركز للعلاج.
- الإلتزام باجراءات ومتطلبات السلامة والصحة العامة المتعلقة بكوفيد 19 بما فيها التباعد الجسدي واللبس الواقي وكل ما ينص عليه البروتوكول الصحي.

#### القسم الخامس: عواقب انتهاك مدونة السلوك

قد يؤدي أي انتهاك لقواعد السلوك هذه من قبل الموظفين والعمال ألى عواقب وخيمة ،بما في ذلك الأنهاء و الاحالة المحتملة الى السلطات القانونية.