



REPUBLIC OF SIERRA LEONE

MINISTRY OF HEALTH AND SANITATION

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

FOR THE

FENCING OF THE WESTERN AREA DISTRICT COUNCIL CEMETERY- (EBOLA CEMETERY)

UNDER THE

ADDITIONAL FINANCING COVID-19 EMERGENCY PREPAREDNESS AND RESPONSE PROJECT
(PARENT PROJECT)

FINAL REPORT

August 2022

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LIST OF ABBREVIATIONS

AF	Additional Financing
AIDS	Acquired Immune Deficiency Syndrome
CHO	Community Health Officer
CHW	Community Health Workers
CMO	Chief Medical Officer
COVAX	COVID-19 Vaccines Global Access Facility
COVID-19	Coronavirus Disease 2019
E&S	Environmental and Social
EPA	Environmental Protection Agency
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FSU	Family Support Unit (of the Sierra Leone Police Force)
GoSL	Government of Sierra Leone
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
HCW	Health Care Waste
IHPAU	Integrated Health Project Administration Unit
IPC	Infection Prevention and Control
MoHS	Ministry of Health and Sanitation
NA	Not Available
NGO	Non-Governmental Organizations
OHS	Occupational Health and Safety
OPD	Out Patients Department
PPE	Personal Protection Equipment
SARS COV 2	2019 Novel Coronavirus
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SL	Sierra Leone
SOP	Standard Operating Procedure
WARDC	Western Area Rural District Council
WHO	World Health Organization

EXECUTIVE SUMMARY

Background

The Government of Sierra Leone is implementing the Sierra Leone COVID-19 Emergency Preparedness and Response Project with Additional Financing. The overall development objective of the Project is to prevent, detect and respond to the threat posed by COVID-19 and strengthen national systems for public health preparedness in Sierra Leone. The expected outcome is to prevent the occurrence of lack of burial space resulting from the possibility of high mortality from an escalation of the COVID-19 disease. The components are:

- Component 1: Supporting National and Sub-national Public Health Institutions for Prevention and Preparedness
- Component 2: Strengthening Multi-Sector National Institutions and Platforms Development and Coordination of Prevention and Preparedness using One Health approach
- Component 3: Emergency COVID-19 Response
- Component 4: Implementation Management and Monitoring and Evaluation

Under sub-component 4 (Safe and Dignified Burial) of Component 3 (Emergency COVID-19 Response), the project is supporting the Fencing of the Western Area District Council Cemetery (Ebola Cemetery). It is an activity under the COVID-19 Parent Project. The World Bank and Sierra Leone EPA recommended that an Environmental and Social Management Plan upon screening and categorizing the sub-project based on the screening template provided in the Parent Project Environmental and Social Management Framework (ESMF). The ESMP is prepared in line with World Bank Environmental and Social Standard 1 (ESS1) Assessment and Management of Environmental and Social Risks and impacts as well as relevant Sierra Leonean laws such as the Environmental Protection Act, 2008. Relevant World Health Organization (WHO) COVID-19 guidelines and World Bank Good Practice Notes also inform this document.

The project involves the construction of a concrete fence (wall) around the WARDC Cemetery. The sub-project also involves the construction of two (2) gatehouses with washrooms, a store room for keeping of burial tools and Personnel Protective Equipment (PPEs), four (4) solar-powered security lights, two (2) poly tanks (total capacity -1000 liters). In addition, the following will be provided in the cemetery: a bath and toilet facility including changing rooms designed to meet the requirements of universal access) and a shed (waiting area) for the burial teams. Water will be supplied to the facility during the operational using water tankers.

The project activities involve excavation, ground blinding block work, and construction. It is estimated that a maximum of twenty (20) workers will be involved. These will include skilled labor e.g. engineers, semi-skilled labor (masons and carpenters), and unskilled labor such as laborers who will be working on-site at any point in time. Site workers will commute to work daily. Some of the equipment on site will be poke vibrators and concrete mixers. Within six

(6) months, the construction of a concrete fence around the WARDC Cemetery will be completed.

The proposed project site (Latitude 8°20'51.90"N, Longitude 13°3'17.02"W) is Ebola Cemetery, Waterloo. The Cemetery can be accessed from Freetown-Masiaka Highway, via Banga Farm Road and Koroma Street. The site can also be accessed remotely via the Sand-Sand Road (refer to Appendix A for Location Map). The KPM Secondary School is southeast of the cemetery (see the site and its environs in Appendix B). All access roads from the Freetown-Masiaka Highway to the cemetery site are untarred.

A creek spans the north of the cemetery. It lies about 100 meters away from the boundary of the cemetery. Jopor Farms and Korea are to the east of the cemetery, about 50 meters away from the boundary, while Bolima and Five-Five (Kissi Town) Communities in Waterloo span the south and west respectively, the nearest development to the cemetery in these communities is about 500 meters away. The KPM Secondary School lies southeast of the cemetery, just behind the cemetery boundary.

The cemetery has graves of victims of the Ebola Disease, August 14 Landslide together with those of the Pa Demba Road Correctional Center jailbreak. The size of the cemetery is 52 acres with a total perimeter of 1175.5 meters. The cemetery slopes towards the north. The site has secondary vegetation. There is an existing untarred road connecting the Cemetery to the Freetown-Masiaka Highway.

The Western Area Rural District experiences high temperatures throughout the year. The hottest month is April just before the main rainy season, with a mean temperature of 31.2 °C over the past decade, while the coolest month is August (23 °C over the past decade). The rainy season is from May to November while the dry spell lasts from December to April. The average annual rainfall is 2945.3 mm. Although the Ebola cemetery is located in Waterloo, its sphere of influence covers the Western Area Rural and Western Area Urban Districts as the cemetery serves these two districts.

Officials of Western Area Rural District Council (WARDC), residents of Jopor Farm, Korea, Bolima, and Five-Five Communities in Waterloo were consulted as part of the preparation of the ESMP. Issues discussed included GBV/SEA/SH issues and mitigation measures; an alternative route for people who use the cemetery as a thoroughfare, the proposed start date of the project, project description as well as how to deal with accidents and other grievances. Letters and face-to-face meetings (with COVID-19 protocols duly observed) were the main tools used during the consultation process. Key issues discussed included accident/incidence reporting; Gender-Based Violence preventive measures and referral pathways. Recommendations to deal with the stakeholder concerns and project risks/impacts were also discussed.

The Environmental and Social Management Plan (ESMP) identifies anticipated project risks and impacts during the construction, operational and decommissioning phases of the project. These include accidents involving site workers, exposure of the same to SARS COV-2 virus and other infections, water pollution, generation of construction waste, and contractor and sub-contractors employing underage persons to work on-site and/or subvert Sierra Leone labor laws. During the operational phase, inappropriate cleaning and disinfection methods can expose burial teams and workers at the cemetery as well as the public to infectious diseases, including COVID-19. The incidence of Gender Based Violence (GBV) including Sexual Abuse and Exploitation (SEA) as well as Sexual Harassment (SH) is also a risk that is associated with the implementation of the sub-project.

Mitigation measures have been proposed in the ESMP for the construction phase including enforcement of Environmental and Social Clauses inserted into the Works Contract that will be binding on the Contractor and any Sub-Contractor that will be employed on the sub-project, ensuring the use of Personnel Protective Equipment, and signing of Code of Conduct by site workers and the toolboxes meetings. Operational Phase mitigation measures in the ESMP also include organizing training programs for burial teams and workers at the cemetery, enforcement of the use of Personnel Protective Equipment (PPEs), implementation of SL-SOPs prepared in line with WHO COVID-19 guidelines and other Good International Industry Practices (GIIPs). The use of trained focal persons at the community level to receive GBV/SEA/SH complaints and other grievances and refer to service providers and other appropriate agencies for resolution has been proposed in the ESMP together with other preventive, accountability, and reporting measures in line with the survivor centered approach and the Sierra Leone GBV Referral Pathway. These mitigation measures have been costed and responsible parties for implementation have been included in the Environmental and Social Management Plan.

The Ministry of Health and Sanitation will be responsible for environmental and social monitoring and reporting during the construction phase. The Ministry has the Integrated Health Project Administration Unit (IHPAU). The Environmental and Social Safeguards Unit at IHPAU will ensure that environmental and social management, monitoring, and reporting requirements of the World Bank and Sierra Leonean environmental, labor, planning, social protection, and public health laws are complied with during the construction phase of the project.

The Ebola Cemetery belongs to the Western Area Rural District Council (WARD C). It obtained the land from two families in Waterloo, namely, the Francis John and King Families of Waterloo in 2017 at cost of three billion Leones. The Council together with the Ministry of Health and Sanitation (MoHS) will be responsible for operational phase maintenance including ensuring the provision of PPEs, cleaning materials, and sanitary facilities/tools are provided for workers at the Ebola Cemetery. It will also ensure that safeguards requirement is met at all times. The Environmental Health Officer at WARD C will be in charge of the Ebola

Cemetery. He will ensure that the environmental, social, health, and safety requirements are always met during the operational phase.

The estimated cost for implementing this ESMP (inclusive of environmental and social monitoring), outside the works contract price is estimated at Nine Thousand, Six Hundred and Fifty United States Dollars (USD 9,650.00). Table 5.5 presents the summary cost estimates and the proposed sources of funding.

A grievance redress mechanism for the general population, site workers, GBV survivors, and emergency response procedures for routine hazards have also been prepared as part of the ESMP. Environmental and Social Contractual Clauses to be inserted into the contract/bid documents as well as a sample Code of Conduct for site workers have also been attached in the appendices (see Appendix E and J respectively). Also attached in the Appendices are the Sierra Leone Burial Standard Operation Procedures (SOPs).

In conclusion, the negative environmental and social impacts/risks associated with the execution of the project are not significant enough to offset the benefits, if the ESMP is implemented. The safeguard unit at IHPAU will take cognizance of all negative impacts/risks identified in this report and ensure that the project is executed to meet the requirements of Sierra Leone's environmental and social laws as well as the relevant World Bank Environmental and Social Standards (ESSs).

CHAPTER ONE

INTRODUCTION

1.0 BACKGROUND

The Government of Sierra Leone is implementing the Sierra Leone COVID-19 Emergency Preparedness and Response Project (Parent Project, Additional Financing (AF1) and Second Additional Financing (AF2)). The World Bank is providing support to the Government for preparedness planning to provide optimal medical care, maintain essential health services, and minimize risks for patients and health care facility, workers. The overall development objective of the Sierra Leone COVID-19 Emergency Preparedness and Response Project is to prevent, detect and respond to the threat posed by COVID-19 and strengthen national systems for public health preparedness in Sierra Leone. One of the expected outcomes is to prevent the occurrence of a lack of burial space resulting from the possibility of high mortality from an escalation of the COVID-19 disease. Against this background the project would support local councils in acquiring and developing safe and dignified burial grounds. The components of the project are:

- Component 1: Supporting National and Sub-national Public Health Institutions for Prevention and Preparedness
- Component 2: Strengthening Multi-Sector National Institutions and Platforms Development and Coordination of Prevention and Preparedness using One Health approach
- Component 3: Emergency COVID-19 Response
- Component 4: Implementation Management and Monitoring and Evaluation

Under Sub-component 4 (Safe and Dignified Burial) of Component 3 (Emergency COVID-19 Response), the project is financing the Fencing of the Western Area District Council Cemetery (Ebola Cemetery). It is an activity under the Parent project that was rolled back into the Additional Financing.

The fencing of the Western Area District Council Cemetery (Ebola Cemetery) is expected to carry risks and adverse impacts on the environment, social systems, and human health during the construction and the operational phase. An environmental and social screening exercise concluded that the project is categorized as one carrying 'Moderate' environmental and social risks under the World Bank Environmental and Social Framework. The Bank, subsequently, recommended the preparation and approval of an Environmental and Social Management Plan (ESMP) prior to commencement of works, hence, the preparation of this plan.

1.1 Sub-Project Description

The sub-project involves the construction of a concrete fence around the WARDC Cemetery. The cemetery has graves of Ebola and August 14 Landslide victims together with the graves of victims of the Pa Demba Road Correctional Center jailbreak. The site covers an area of 52 acres (210,436.53m²) with a perimeter of 1175.5 meters (see Appendix A for the Site Plan of the Cemetery). It is estimated that fencing (civil works) of the WARD C Ebola Cemetery will last six (6) months (see Appendix B-Locational Map).

Other aspects of the civil works are the construction of two gatehouses with washrooms, a storeroom for the storage of tools and PPEs, four (4) solar-powered security lights and two (2) poly-tanks of 1000 liters capacity. In addition, the following will be provided in the cemetery; a bath and toilet facility designed for universal access including changing rooms for the burial team and a shed (waiting area) for the burial team. It is estimated that rehabilitations/renovations will be completed within six (6) months.

1.2 Site Location/Access

The proposed project site (Latitude 8°20'51.90"N, Longitude 13°3'17.02"W) is Ebola Cemetery, Waterloo. The Cemetery can be accessed from Freetown-Masiaka Highway, via Banga Farm Road and Koroma Street. The site can also be accessed remotely via the Sand-Sand Road. All connecting access roads from the Freetown-Masiaka Highway to the cemetery are untarred (see Appendix A for Location Map and Appendix B for the site and its environs).

1.3 Site Description

A creek spans the north of the cemetery. It lies about 100 meters away from the boundary of the cemetery. Jopor Farms and Korea are to the east of the cemetery, about 50 meters away from the boundary, while Bolima and Five-Five (Kissi Town) Communities in Waterloo span the south and west respectively, the nearest development to the cemetery in these communities is about 500 meters away. The KPM Secondary School lies southeast of the cemetery, just behind the cemetery boundary.

The cemetery slopes towards the north. The site has secondary vegetation including wild palm trees. The Cemetery already contains graves of Ebola Virus Disease and August 14 Landslide victims as well as that of victims of the Pa Demba Road Correctional Center Jail Break (see Appendix C: Plate 2 for the section of the cemetery with graves). There is a natural drain about 15 meters from the eastern boundary of the site, the drain carries run-off and empties into the creek (see Plate 3 for the natural drain and Plate 4 for the creek). The size of the cemetery is 52.725 acres with a total perimeter of 1175.5meters.

There is a dilapidated two-seater toilet facility in the cemetery (see Plate 6 in Appendix C). The site does not have access to potable water and grid electricity.

1.4 Sub Project Activities and Labor Force

Activities to be undertaken as part of the renovation/rehabilitation works are:

- i. Excavation (trenching);
- ii. Ground blinding with concrete;
- iii. Block work;
- iv. Installation of doors, gates, solar panels, solar lights, and overhead water tanks
- v. Painting;
- vi. Laying of pipes
- vii. Roofing of structures

10 semi-skilled labor (masons, carpenters, steel bender painters) and 10 unskilled such as laborers. An engineer, environmental, social, health and safety officer, and a site supervisor will constitute the skilled labor force managing the civil works. Machinery and equipment that will be used for the sub-project include:

- i. Concrete mixer (4)
- ii. Poke vibrator (1)
- iii. Haulage vehicle (3)

1.5 Objective of Study

The main objective of the study is to critically examine the construction of a fence around the WARDC Cemetery (Ebola Cemetery) so as to identify its environmental and social impacts/risks and prepare an Environmental and Social Management Plan (ESMP) to mitigate the adverse impacts/risks of the proposed development in line with Sierra Leonean law, Environmental Protection Act, 2008 and World Bank Environmental and Social Framework (ESF)-specifically, Environmental and Social Standard 1 Assessment and Management of Environmental and Social Risks and Impacts (ESS1).

The ESMP also seeks to identify impacts/risks as well as define and outline the avoidance, mitigation/management, and monitoring, measures to be undertaken during project implementation and in the post-construction phase of the project to prevent, minimize, mitigate, or compensate for the environmental and social impacts/risks associated with the project. In addition, the ESMP seeks to enhance the project's beneficial impacts.

1.5 Scope of the Assignment

The proposed sub-project involves the Fencing of the Western Area District Council Cemetery (Ebola Cemetery). The scope of work for the assignment is to prepare an Environmental and Social Management Plan (ESMP) in line with Sierra Leonean law, Environmental Protection Act, 2008, and World Bank ESF.

1.6 Methodology

The approach to the preparation of the ESMP is in accordance with the World Bank ESF, which contains environmental and social standards that borrowers must apply to all projects in order for the projects to be sustainable, non-discriminatory, transparent, participatory, environmentally and socially accountable as well as conform to good international practices and Sierra Leonean law, Environmental Protection Act, 2008. The assignment was carried out in three different activities, which are as follows:

- Literature review;
- Site visit and inspection (see Appendix C: for site visit pictures); and
- Stakeholder consultations (see Appendix C Plates 8-10: for consultation pictures)

CHAPTER TWO

2.0 LEGAL AND POLICY FRAMEWORK

2.1 National Legal and Policy Framework

There are several laws in Sierra Leone concerned with development, public health issues and the environment in general. The major environmental and social laws related to this sub-project are listed in Table 2.1.

Table 2.1: Relevant National Laws

Legislation	Relevant Sections
Environmental Protection Agency Act, 2008	<p>The EPA Act is the legislation governing the protection of the environment and the EIA/ESIA process. This Act establishes the role and function of the Environment Protection Agency (EPA) for monitoring the implementation and evaluation of national environmental policies of Sierra Leone as well as the obligations of the proponent (environmental licenses holders) and the Board of Directors of SL-EPA in the event that an environmental license is granted.</p> <p>Part IV of the EPA Act 2008 exclusively deals with the activities that require an EIA and the requirements of an EIA. This part of the Act emphasizes the processes and procedures leading to the acquisition of environmental impact licenses with respect to the conduct of an acceptable EIA study. Projects likely to have negative environmental impacts or for which an EIA or EMP is required under the Act's Regulation, should not be implemented unless an EIA/EMP has been concluded and approved in accordance with these regulations.</p> <p>Once an application is made to the Agency. It screens the application and advises on the need for an environmental license and, subsequently, the appropriate instrument that will be prepared with the accompanying guidelines for projects that require an Environmental Impact License. SL-EPA screens and categories projects that require an Environmental Impact License into Category A, B, and C respectively based on:</p> <ol style="list-style-type: none"> i. Location, size, and likely output of the undertaking; ii. Technology intended to be used; iii. Magnitude and sensitivity of impacts;

Legislation	Relevant Sections
	<p>iv. Concerns of the general public, if any, and in particular concerns of immediate residents if any; and</p> <p>v. Land use and other factors relevant to the particular undertaking to which the application relates.</p> <p>Projects rated as Category A and B will require an Environmental Impact Assessment, while for Category C Projects, registration and screening suffices.</p> <p>Our reading of Section 24: First Schedule of the Act indicates that this sub-project (construction of a fence and ancillary facilities at the Ebola Cemetery) does not require an Environmental Impact License.</p>
<p>The Freetown Improvement Extension (Amendment) Act, 1964</p>	<p>The Act establishes Freetown and its surrounding districts as a planning area and sets out town planning regulations to guide development control in the designated planning area. Section 18 confers the power to alter, repair, or pull down defective structures and structures detrimental to public health and safety at cost to the developer to the Director of Public Works, subject to the consent of a magistrate.</p>
<p>The Public Health Ordinance, 1960</p>	<p>This Act remains the principal piece of public health-related legislation in Sierra Leone. The Act places sanitation management, premises inspection, environmental hygiene, food safety, prevention of water pollution, and designation of sanitary sites under the remit of the Ministry of Health and Sanitation and by extension the Health Authorities at the local level. The Act confers the power to declare health areas on the Minister of Health and Sanitation. These areas may include POEs, urban, rural or working zones. More importantly, Part II of the Act also empowers the Minister to set up Endemic Control Areas. Part III (2) of the Ordinance: Statuary Nuisance, among others, empowers the Health Authority to summarily cause the removal of:</p> <ul style="list-style-type: none"> • any collection of water or any water vessel found to contain eggs or larvae of mosquitoes, or any premises, on which conditions whether natural or artificial are likely to cause the propagation or harboring of mosquitoes; • any well, tank, cistern, or water-butt used for the supply of water for domestic purposes which is so placed, constructed, or kept as to render the water therein liable to contamination prejudicial to health; • any collection of water or any water vessel, found to contain eggs or larvae of mosquitoes, or any premises, on which

Legislation	Relevant Sections
	<p>conditions whether natural or artificial are likely to cause the propagation or harboring of mosquitoes; and</p> <ul style="list-style-type: none"> any well, tank, cistern, or water-butt used for the supply of water for domestic purposes which is so placed, constructed, or kept as to render the water therein liable to contamination prejudicial to health.
Public Health Amendment Act, 2014	<p>This amendment to the Public Health Act, 1960 added Ebola and other communicable diseases to Section 2 of the Public Health Ordinance, 1960.</p>
The Factories Act of 1974	<p>The Factories Act, of 1974 demands all aspects of cleanliness, and reports of all injuries, accidents, diseases, and death. Under this Act, the Factories Inspectorate Department under the Ministry of Labor and Social Security has the power to monitor workplace compliance in terms of labor laws, especially among factories, and enforce measures to ensure occupational accidents and diseases are minimized within the work environment (Section V of the Factories Act, 1974). The Act expands the definition of factories to include construction sites. It makes reports of accidents, death, injuries, and the outbreak of diseases mandatory (Section VII) and empowers the Factory Inspectorate Department to enforce general health and safety conditions within factories. There are also sanctions for non-compliance including fines, jail terms, prohibition of work, and closing down of factories.</p> <p>The Act promotes cleanliness, health, and safety within the work environment and covers owners, occupiers, supervisors, and workers alike.</p>
Regulation of Wages and Industrial Relations Act 1971 (No. 18)	<p>These regulations specify the collective agreement between Employers in the Building and Construction Trade Group in the Republic of Sierra Leone involving the following Worker Unions:</p> <ul style="list-style-type: none"> Artisans, Public Works, and Services Employees Union; General Construction workers Union; Skilled and Manual Production workers Union; and Sierra Leone Union of Securities, Watchmen and General Workers Union <p>Conditions of Service issues including Hours of Work (Clause 9), modalities for payment of overtime (Clause 13), and Annual Leave and Leave Allowance (Clause 15) are captured in this Act. Dirty Work</p>

Legislation	Relevant Sections
	<p>Allowance for workers who encounter sewerage, rubbish, wood, dust, and toxic materials (Clause 56) and Termination of Work Contract (Clause 26) are outlined explicitly in the Act. Female workers are entitled to maternity leave with full pay for a maximum of twelve weeks (Clause 17).</p> <p>Health and Safety issues are covered under Clauses 37 and 51. They include the Employer providing raincoats, goggles, welding masks, helmets, and other safety gear as well as toilet and hand washing facilities for employees. Workers' right to form unions and engage in collective bargaining is recognized in Clause 30, while Clause 32 confers the right to representation (join or form Unions) to workers.</p> <p>In the Act, Clause 29 explicitly outlines Workers Grievance Redress Mechanisms in a seven-step process. The process commences from verbally discussing grievances with immediate supervisors, then to management (employers) either directly or through union leadership where unions exist, and finally petitioning the Minister of Labor and Social Security in the event that work-based grievance redress measures fail to resolve the grievance in question.</p>
The National Fire Service Act, 1980	<p>The Act establishes and lays out the constituents of the Sierra Leone Fire Service as well as the National Fire Force. It also empowers the Minister to establish Fire Authorities in designated areas. The Act also grants the right of entry to fire and police officers for fire prevention and control.</p>
Child Rights Act, 2007	<p>Part III of the Act talks about the Employment of Children. It stipulates the minimum age at which free education ends, when children can engage in full-time employment or apprenticeship at fifteen (15 years). However, the Act allows children to engage in light work (non-strenuous and non-hazardous work) at the age of thirteen (13), only persons eighteen (18) years and above can engage in hazardous work such as civil works. The Act, which prohibits children from working at night, also set conditions for an apprenticeship. To meet the requirements of this Act, persons 18 years or below must not work on site.</p>
Sexual Offences Act, 2012 as Amended in 2019	<p>The Sexual Offences Act of 2012 criminalizes non-consensual sex between persons, including spouses. The Act increased the consensual age from 13 years, under the Prevention of Cruelty against Children Act (CAP 31) to 18 years. Section 19 of the Act introduces the concept of sexual penetration, which replaces Unlawful Canal Knowledge and increases the organs involved in sexual penetration to include the</p>

Legislation	Relevant Sections
	<p>mouth and anus. The Act further provides that the use of an object for penetration satisfies the act of sexual penetration. The Act is gender neutral, technically including sexual acts between the same sexes. Marriage is not a defence for perpetrators under this Act. The confidentiality of victims (survivors) during investigation and prosecution is guaranteed under the Act. The Act also provides for medical assistance for survivors and sets out sanctions for offenders including jail terms.</p>
<p>Local Government Act, 2004</p>	<p>This Act seeks to devolve all development initiatives and authority to people at the grassroots. As such, it has empowered the local councils as the highest political and legislative authority in the locality. The Councils are responsible for promoting the development of the locality with the resources at their disposal and those that they can mobilize from the central government and its agencies, NGOs, and the private sector.</p> <p>Part VII Section 90, also empowers the Local Councils to enact by-laws consistent with the provisions of the national constitution. The bylaws may cover community health and safety issues including sanitation, food safety, and animal husbandry.</p> <p>Under Schedule III of the Act functions under the Ministry of Health and Sanitation devolved to the Councils, including maintenance of non-technical equipment, facilities management, and procurement of equipment and medicines. The Ebola Cemetery belongs to the Western Rural Area Council (WARD C). The Council will be in charge of its maintenance.</p>
<p>Persons with Disability Act, 2011</p>	<p>Per Section 24(2) of this Act, public buildings/facilities that are accessed by the public are to be disability friendly, while Section 14 (2) enjoins government to adapt existing structures to enhance access by persons with disability. In Sections 20 and 21 of the Act, it is an offense to deny a person contracts and employment opportunities based on disability. Construction of wash and changing rooms, toilet facilities, and other ancillary facilities under this sub-project must be designed to meet universal access</p>
<p>Prevention and Control of HIV and AIDS Act, 2007</p>	<p>The Act seeks to control the spread of HIV-AIDs and prevent discrimination against Person Living with HIV/AIDS. Prevention and Control of HIV and AIDS, Act 2007 enjoins government to create awareness about the mode of transmission and support for Person Living with HIV/AIDS. Section 23 establishes that discrimination against Persons Living with HIV/AIDs in terms of access to employment, health</p>

Legislation	Relevant Sections
	services, and education is an offense. While Section 11 also prohibits testing for HIV/AIDS as a condition for gaining employment, Section 21 makes deliberate or recklessly transmission and non-disclosure of HIV/AIDS positive status prior to sexual encounter an offense.
The Anti-Corruption Act, 2008	The Act establishes the independent Anti-Corruption Commission for the prevention, investigation, prosecution, and punishment of corruption and corrupt practices and related matters.
The Right to Access Information Act, 2013	The Act provided for the disclosure of information held by public authorities or by persons providing services for them. This ESMP needs to be disclosed to meet the requirements of this Act.

In addition to the above legislations, the proposed sub-project will reflect aspects of the under-listed national policies:

- National Health Policy;
- Sierra Leone Local Content Policy of 2012;
- National Policy on the Advancement of Women; and
- National Policy on Gender Mainstreaming

2.2 World Bank Environmental and Social Framework and Accompanying Standards

The World Bank ESF seeks to support borrowers to develop and implement environmentally and socially sustainable projects as well as build capacity in the assessment and management of environmental and social impacts and risks associated with the implementation and operation of projects. The ESF contains environmental and social standards that borrowers must apply to all projects in order for the projects to be sustainable, non-discriminatory, transparent, participatory, environmentally and socially accountable as well as conform to good international practices. The ten (10) Environmental and Social Standards (ESS) are:

- i. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts;
- ii. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions;
- iii. Environmental and Social Standard 3(ESS3): Resource Efficiency and Pollution Prevention and Management;
- iv. Environmental and Social Standard 4 (ESS4): Community Health and Safety;
- v. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- vi. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- vii. Environmental and Social Standard 7 (ESS7): Indigenous Persons/Sub Saharan African Historically Underserved Traditional Local Communities;
- viii. Environmental and Social Standard 8 (ESS8): Cultural Heritage;
- ix. Environmental and Social Standard 9(ESS9): Financial Intermediaries; and

- x. Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure.

The relevant Environmental and Social Standards are presented in Table 2.2.

Table 2.2: Relevant Environmental and Social Standards

Relevant Environmental & Social Standard	Required Measures and Actions
ESS1-Assessment and Management of Environmental and Social Risks and Impacts	The Environmental and Social Management Framework (ESMF) requires an ESMP for activities such as minor construction works rated moderate under the ESF during the environmental and social screening using the template presented in the ESMF.
ESS2-Labor and Working Conditions	<p>Project workers will be managed in accordance with the requirements of national laws and legislation as well as terms and conditions of employment, non-discrimination, equal opportunity, and establishing/managing worker’s organizations for construction companies under ESS2. Restrictions on child labor and forced labor are to be enforced.</p> <p>The Occupational Health and Safety (OHS) measures to ensure the health and safety of workers are in line with the COVID-19 Emergency Response and Preparedness Project ESMF, IPC&WMP as well as SL- Burial SOPs.</p> <p>The Grievance Mechanism for workers and the roles and responsibilities for monitoring such work-based grievance redress mechanisms will be incorporated into the contract requirements and implemented during the construction and operational phase.</p> <p>Provisions to prevent GBV/SEA/SH, including specific Codes of Conduct for site workers in line with relevant national laws and legislation will be observed.</p>
SS3-Resource Efficiency and Pollution Prevention and Management	Appropriate pollution prevention, resource conservation, and IPC&WMP measures in the Project ESMF and Health Care Waste Management Plan (HCWMP) are incorporated into the ESMP. Materials such as sand and gravel for the sub-project will be sourced from local third-party suppliers within the sub-project corridor. No burrow pits and quarries will be established for the purpose of undertaking this sub-project.
ESS4-Community Health and Safety	The construction of a concrete fence around the WARD C Ebola Cemetery will follow ESMF prescribed measures to avoid any form of Sexual Exploitation, Abuse, and Harassment (SEA/H) by

ESMP for the Fencing of the Western Area District Council Cemetery (Ebola Cemetery)

Relevant Environmental & Social Standard	Required Measures and Actions
	<p>following the ESMF and World Bank SEA/SH Good Practice Note for all project workers. Other community health and safety risks include an intermittent increase in noise levels, air pollution from dust-generating activities, and accidents involving haulage and construction trucks and equipment that can lead to loss of life and properties of residents within the project corridor</p> <p>The construction of a concrete fence follows ESMF prescribed measures to ensure community health and safety including measures to prevent and minimize exposure and community spread of SARS COV-2 virus and other infectious diseases and maximizing the safety of workers during the construction and operation phase</p>
<p>ESS10-Stakeholder Engagement and Information Disclosure</p>	<p>The MoHS has undertaken appropriate community and stakeholder outreach for this construction works and will establish accessible, transparent, participatory, time-bound grievance redress mechanisms following the Stakeholder Engagement Plan (SEP) for the COVID-19 Project prior to the commencement of works in line with the requirements of ESS10.</p> <p>The ESMP will be disclosed on the MoHS website and copies will be made available to the WARDC and the headman of the project community. Minutes of the community consultation have been shared with the WARDC Local Council and the Headman of the project community.</p>

2.3 World Bank Environmental and Social Risk Classification

Under the World Bank ESF, the World Bank classifies projects into four (4) categories, High, Substantial, Moderate, and Low largely based on the scale of the project, level of impact, and risks associated with the undertaken in the country's socio-political conditions as well as the capacity of the borrower to manage the associated impacts/risks. Projects classified as category 'High' Risk carry very significant and mostly irreversible environmental and social impacts/risks and are considered as high-risk activities requiring environmental and social impact assessment. Projects are categorized as high risk if, they are to be implemented in countries or regions with a history of social conflict, uncertain or weak regulatory environment and the borrower has a weak capacity to manage risks/impacts. High-risk projects also have long-term, irreversible significant, cumulative transboundary impacts/risks that are difficult or sometimes impossible to mitigate.

Substantial Projects are less complex medium-scale projects. Such projects have, few adverse impacts compared to high-risk projects, which are mostly temporary and reversible. Projects rated as substantial may have a transboundary impact but the impacts/risks can be readily mitigated. Projects in this category, they are implemented in countries and regions, in which there are concerns about social conflicts and the capacity of the borrower can be addressed. Projects rated as moderate have impacts of low magnitude which are predictable, temporary, reversible site-specific and easily mitigated, while those rated 'low' have minimal to negligible impacts and may not require any environmental and social assessment.

The World Bank rates this sub-project as Moderate. The anticipated adverse impacts and risks associated with the project activities are mostly predictable, temporary, and reversible and can be mitigated through the preparation and implementation of an Environmental and Social Management Plan (ESMP). The Bank has indicated that an ESMP should be prepared for review and approval by the Bank prior to the commencement of works. The environmental assessment for a Moderate project includes:

- Examining the project's potential negative and positive environmental impacts
- Recommending measures to prevent, minimize, mitigate, or compensate for adverse impacts; and
- Recommending measures to improve environmental performance.

2.4 Relevant World Bank Group Guidelines, 2007

a. World Bank Group EHS Guidelines, 2007

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP), as defined in ESS3. The EHS Guidelines contain the performance levels and measures that are normally acceptable to IFC and that are generally considered achievable in new facilities at reasonable costs by existing technology. For World Bank-funded projects, application of the EHS Guidelines to existing facilities may involve the establishment of site-specific targets with an appropriate timetable for achieving them. The environmental assessment process may recommend alternative (higher or lower) levels or measures, which, if acceptable to IFC/World Bank, become project or site-specific requirements. The World Bank Group EHS Guidelines for Water and Sanitation are relevant for this project.

b. World Bank Good Practise Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works

The Good Practice Note operationalize and discusses the scope, prevention, minimization, and mitigation measures for Gender-based Violence risks that are associated with Bank Investment Project Financing. It covers Sexual Exploitation and Abuse (SEA)-exploitation of a

vulnerable position differential power or trust for sexual favors and actual or threatened sexual intrusion, Workplace Sexual Harassment (SH) in the form of unwanted sexual advances, requests for sexual favors, and sexual physical contact as well as human trafficking (Sexual slavery, coerced transactional sex, illegal transaction people movement. Also presented in the guidance note are non-SEA issues-physical assault, psychological and physical abuse, denial of physical services and resources together with intimate partner violence. In responding to project-related GBV/SEA/SH risks, the document proposes adaptable survivor-centered as well as risk and evidence-based approaches that emphasize prevention and risk minimization-especially risks that harm girls and women. It also alludes to the importance of building on local knowledge through stakeholder engagement and continuous monitoring and learning.

Strategies to be implemented by various actors throughout the project cycle to identify GBV/SEA/SH risks on bank-financed projects include risk mapping, assessment, and stakeholder consultation. Mitigation and minimizing measures such as the use of Codes of Conducts, GBV Service Providers, and Environmental and Social Management Plans in addition to capacity assessment are discussed in the document. The guidance note also layouts monitoring and evaluation requirements and stresses the need for sensitization and capacity building for stakeholders.

c. ESF/Safeguards Interim Note: Covid-19 Considerations in Construction/Civil Works Projects

This interim note emphasizes the importance of careful scenario planning, clear procedures and protocols, management systems, effective communication and coordination, and the need for high levels of responsiveness in a changing environment due to the COVID-19 pandemic. It recommends assessing the current situation of projects, putting in place mitigation measures to avoid or minimize the chances of infection (coronavirus), and planning what to do, if either project workers become infected or the workforce including workers from proximate communities are affected by COVID-19. The recommendation in this interim note covers cleaning and waste disposal, medical services, and general hygiene for the workforce together with the management of site entry and exit points, work practices, and medical supplies for site workers. There are also recommendations to ensure continuity in the supply of materials and project activities amidst disruption in supply chains because of COVID-19. The interim note is useful for both PIU staff Project Consultants and Contractors

2.5 Relevant Technical WHO Guidelines for COVID-19 Virus

The World Health Organization since the outbreak continues to issue a few guidelines to prevent and contain the spread of infections among the population as well as frontline workers. These guidelines are updated as and when knowledge about SARS COV 2 improves. Relevant guidelines that relate to the project are discussed below.

a. Water, Sanitation, Hygiene, and Waste Management for the COVID-19 Virus

WHO has updated its technical brief for water and sanitation practitioners amidst the outbreak of COVID-19. The guidelines cover water, sanitation, and health care waste management. It presents strategies in WASH in the health care setting as well as the home/community environment. Thematic areas discussed under WASH in the health care setting include practices for hand hygiene, sanitation and plumbing, emptying latrines and holding tanks, transporting excreta off-site, toilets and handling faeces, cleaning practices and safely disposing of greywater or water from washing PPEs, surfaces, and floors. <https://www.who.int/publications/i/item/water-sanitation-hygiene-and-waste-management-for-the-covid-19-virus-interim-guidance>

b. Rationale for the Use of PPE

This WHO technical reference document is relevant for both site workers and health personnel alike. The guidelines acknowledge disruption in the PPE supply chain as a result of the outbreak and spread of COVID-19 and outline measures to minimize the over-dependence on PPE amidst the global shortage. This notwithstanding, the guideline underscores the importance of the proper use of PPE as a measure against the spread of the disease. It also outlines activities and personnel requiring PPE, the type of PPE required, the settings within which the PPEs will be required. It also emphasizes the need for hand and respiratory hygiene as complementary measures to the use of PPE. <https://apps.who.int/iris/handle/10665/331498>

c. Getting Your Workplace Ready for COVID-19

The document presents simple measures to be implemented within the workplace to prevent the spread of COVID-19. These measures include activities to ensure that the workplace is clean and hygienic, things to be considered during traveling and when workers return from travel, and getting your business ready in case COVID-19 arrives in the community (see <https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf?ua=1> for details).

Interim Note: Protection from Sexual Exploitation and Abuse (PSEA) During Covid-19 Response (WHO, UNFPA, UNICEF, UNHCR, WFP, IOM, OCHA, CHS Alliance, InterAction, UN Victims' Rights Advocate)

The Interim note underscores the potential for SEA/SH cases to be on the rise during the COVID-19 pandemic and also the fact that health/frontline workers can be survivors or perpetrators of SEA/SH. It also recommends risk reduction and preventive measures such as building safeguards into the recruitment process for volunteer frontline workers and focal persons. Other measures focus on providing safe and accessible channels for reporting SEA/SH and GBV cases, promoting a culture of speaking up together with measures that provide protection and support for SEA/SH/GBV survivors and co-ordination within-country

initiatives (see <https://reliefweb.int/report/world/interim-technical-note-protection-sexual-exploitation-and-abuse-psea-during-covid-19> for details).

CHAPTER THREE

3.0 BASELINE CONDITIONS

The baseline information covers the immediate project environs. Baseline information was acquired through the following means; site visits and inspections, literature reviews, and consultations with stakeholders. The report considered the adjoining land uses, and the natural and socio-economic environment of the project zone.

3.1 Land Use Activities within the Sub-Project Zone

The proposed sub-project site (Latitude 8°20'51.90"N, Longitude 13°3'17.02"W) is Ebola Cemetery, in Kissi-Waterloo. The land cover of the site consists of vegetation. There is a dilapidated two-seater toilet formerly used by burial teams at the site. The site does not have access to grid electricity and water supply. It is not possible to estimate the number of graves in the cemetery since there were mass burials and unmarked graves at the cemetery.

A creek spans the north of the cemetery. It lies about 100 meters away from the boundary of the cemetery. Jopor Farms and Korea are to the east of the cemetery, about 50 meters away from the boundary, while Bolima and Five-Five (Kissi Town) Communities in Waterloo span the south and west respectively, the nearest development to the cemetery in these communities is about 500 meters away. The KPM Secondary School lies southeast of the cemetery, just behind the cemetery boundary.

3.2 Land Ownership and Acquisition

The Ebola Cemetery site is a 52.725-acre piece of land, which formerly belonged to the Francis John and King Families of Waterloo. The Government of Sierra Leone acting through the Western Area Rural Council approached the landowners in December 2010 for a portion of the current site for the burial of victims of the Pa Demba Road Correctional Center jailbreak. During the Ebola Virus Disease pandemic (2014-2016), the site was designated the official burial ground for victims of the disease in the Western Areas Rural and Urban Districts and their environs. This was extended to cover COVID-19-related deaths when the recent pandemic occurred.

Formal processes to acquire the 52.725-acre cemetery land, inclusive of the original portions seeded to the government for the aforementioned burials and new mass burials such as that of the 14th August 2017 mudslide victims commenced in 2017 with the plotting of the government acquisition (52.725 acres). Subsequent negotiations between the Western Area Rural District Council and the two families concluded on an amount of 3,000,000,000 Leones as compensation for the land. The amount was to be shared equally by the two families (see letter attached from the two families, the conveyance transferring ownership to Government of the Republic of Sierra Leone and other correspondence supporting the Government ownership of the said land as Appendix M). This amount has been paid by the Government of

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Sierra Leone (Ministry of Local Government and Rural). Western Area Rural District Council exercise jurisdiction over the cemetery on behalf of the Government of Sierra Leone.

The Ebola Cemetery prior to the payment of the compensation and the onset of the COVID-19 pandemic was used as both a private and public cemetery. Currently, only burials sanctioned and supervised by the Ministry of Health and Sanitation and approved by the Council take place there. WARDC is responsible for managing the cemetery. No private burials are allowed by WARDC. There are no ambiguities in relation to land ownership and land use of the cemetery. There are no livelihood activities within the demarcated cemetery area and its immediate surroundings.

3.3 Natural Environment

3.3.1 Topography

The cemetery slopes towards the north. There is a creek north of the cemetery, about 100 meters from the boundary.

3.3.2 Climate

The cemetery is located in Waterloo, in the Western Area Rural District. Waterloo experiences high temperatures throughout the year. The hottest month is April just before the main rainy season, with a mean temperature of 31.2° C over the past decade, while the coolest month is August (23°C over the past decade). The rainy season is from May to November while the dry spell lasts from December to April. The average annual rainfall is 2945.3mm.

3.3.3 Soils and Geology

The geology of Waterloo consists of Mesozoic intrusion referred to as the Freetown Complex. The complex primarily consists of gabbro and other igneous rocks. The soils in the area are laterite with clay intrusions.

3.3.4 Ambient Air and Noise Levels

Ambient air quality is satisfactory at the premises. No activity generated noise and dust within the cemetery. During the harmattan/dry season, dust levels may be elevated due to the influence of the northeast trade winds.

3.4 Socio-Economic Characteristics

3.4.1 Population of the Sphere of Influence

Although the construction of a concrete fence around the WARDC Ebola Cemetery is located in Waterloo, its sphere of influence will cover the Western Area Rural and Urban Districts. The total population of Western Area Rural and Urban District is currently estimated to be 1,236,000, of which males constitute 619,236 (50.1%) while females are 616,764 (49.9%). The population is estimated to be growing at 2.78% per annum.

3.4.2 Economic Activities on the Site

There are no economic activities within and outside the premises of the WARDC Ebola Cemetery and within 100 meters radius of the cemetery.

CHAPTER FOUR

4.0 STAKEHOLDER CONSULTATIONS

4.1 Stakeholder Identification

Stakeholder identification and consultation is an integral part of an Environmental and Social Management Plan. Residents of Jopor Farm, Korea, Bolima, and Five-Five (Kissi Town) Communities in Waterloo, Ministry of Health and Sanitation, WARD C, KPM School (staff and students) are stakeholders of this project.

4.2 Stakeholder Consultation

The stakeholders consulted were the Ministry of Health and Sanitation staff as well as residents and community leaders of Jopor Farms, Korea, Bolima, and Five-Five (Kissi Town) Communities Waterloo (see Appendix D: Plate 8 to 10 for consultations pictures and **Error! Reference source not found.**D for Consultation Sheets and Minutes of Community Meeting).

4.3 Consultation Process and Channel Used

The consultation process involved arranged meetings with stakeholders as well as official letters.

The matrix of decisions taken at the stakeholders' consultation as well as issues discussed, meeting attendance, and date of consultation are captured in Table 4.1.

Table 4.1: Consultation Matrix

Stakeholder	Date of Consultation	Attendance/ No. Of Officials Consulted	Channel of Consultation	Issues Consulted On	Conclusions Arrived at	Future Engagement Plans
Western Area Rural District Council (WARD C)	14/12/21	3	Formal Letter Face-to-Face Meeting	<ul style="list-style-type: none"> - Explain the background to ESS - Components of the project - Development of the Bill of Quantities and Engineering Design for the Project - Monitoring the role of the Council - GBV/SEA/SH issues and mitigation measures - Possibilities of integration of youth who currently protect the cemetery into the formal system as laborers and security persons at the cemetery 	<ul style="list-style-type: none"> - The Environmental Health Officer of the Council will support IHPAU to monitor the ESMP - Locals such as skilled and unskilled workers will be employed for the construction to prevent GBV/SEA/SH - Provision of power (solar panels) and water supply should be added as part of the project 	<ul style="list-style-type: none"> - Modalities for Council Engineers to support the Supervision of the Works - Formation of Sub-project Grievance Redress Committee - Operational Phase Monitoring by Council Environmental Health Officer
Surrounding Community (Neighbourhoods)	14/12/21	42	Community Meeting	<ul style="list-style-type: none"> - Rationale for the project - Project description and duration - Inconveniences and project impacts 	<ul style="list-style-type: none"> - Fencing of the cemetery will prevent encroachment and further land litigation - Residents commuting between the 	<ul style="list-style-type: none"> - Future consultations will discuss community safety issues on the haulage routes including the installation of roads

Stakeholder	Date of Consultation	Attendance/ No. Of Officials Consulted	Channel of Consultation	Issues Consulted On	Conclusions Arrived at	Future Engagement Plans
				<ul style="list-style-type: none"> - An alternative route for people who pass through the cemetery to access the communities such as Jopor Farm, Bolima, and Korea. - Employment of youth during the construction and operational phase - Health and safety of residents of the immediate zone including Accidents/incidents and accident/incident reporting <ul style="list-style-type: none"> - GBV/SEA/SH issues/ reporting and referral based on the survivor's consent. This will be part of the grievance 	<p>communities and around the cemetery at the meeting agreed to use the existing alternative route (Sand-Sand Road as indicated in Appendix C. They indicated that this will not pose any challenge to them.</p> <ul style="list-style-type: none"> - IHPAU will impress upon contractors to recruit from the catchment communities to provide short-term employment opportunities for the youth - IHPAU will discuss the possibility of integrating the 12 youth who - voluntary protect the cemetery into formal (Council) systems as laborers and cemetery 	<p>signs and/or provision of speed ramps in sensitive areas</p> <ul style="list-style-type: none"> - Selection of focal persons for receiving grievances including GBV/SE/SH issues

Stakeholder	Date of Consultation	Attendance/ No. Of Officials Consulted	Channel of Consultation	Issues Consulted On	Conclusions Arrived at	Future Engagement Plans
				<ul style="list-style-type: none"> - redress mechanisms - Grievance Redress Mechanisms and composition of Sub-Project Grievance Redress Committee - Dissemination of safeguards documents and project information 	<ul style="list-style-type: none"> - security after the construction of the wall - A participatory grievance redress system will be put in place with multiple reporting points will be established before the project begins so that persons who have concerns during project implementation can report, have their issues, heard, investigated, and resolved amicably. The Community/youth and WARDC will play a key role in the resolution of grievances - There will be a committee made up of representatives of local stakeholders including the WARDC, traditional authorities and 	

Stakeholder	Date of Consultation	Attendance/ No. Of Officials Consulted	Channel of Consultation	Issues Consulted On	Conclusions Arrived at	Future Engagement Plans
					<p>representatives of the aggrieved party(ies), and other local stakeholders who investigate and resolves grievance associated with the implementation of the project. If this Committee fails to address any grievance it will forward to the IHPAU Social Safeguards Specialist</p> <ul style="list-style-type: none"> - Accidents should be reported to the Works Supervisor or the Council 	

CHAPTER FIVE

5.0 ENVIRONMENT AND SOCIAL MANAGEMENT PLAN

5.1 Introduction

This chapter provides a description of activities to avoid, minimize and/or mitigate the environmental and social risks and impacts of the proposed sub-project as well as an indication of the responsibilities of organizations or individuals who will be involved in the environmental and social monitoring of the project.

5.2 Implementation of Environmental and Social Management Plan (ESMP)

In general, environmental impacts that will occur during project implementation include both positive and negative impacts that may emerge in the short, medium, and/or long term. Responsibility for most of the mitigation measures lies with the various works contractor who will be selected to implement the works and the costs involved are expected to be part of and be included in the Works Contracts. Operational phase mitigation measures are the responsibility of the MoHS.

The ESMP is presented in Table 5.1 to 5.3 showing the:

- i. Activity;
- ii. Potential E&S Risks and Impacts;
- iii. Proposed Mitigation Measures;
- iv. Responsibility Party; and
- v. Budget.

There is also an accompanying environmental and social monitoring framework in Table 5.4.

Table 5.1: Environmental and Social Risks and Mitigation Measures during the Planning Stage

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
Site Selection	The siting of the cemetery if not carefully planned and consulted upon will lead to community conflicts and/or upheavals due to the ‘not my backyard’ syndrome	<ul style="list-style-type: none"> - Selection of the cemetery site was undertaken by the Ministry of Health and Sanitation together with partners on the One Health Platform, Ministry of Local Government and Rural Development, and WARDC in consultation with the leadership and youth of the communities around the cemeteries - Landowners and communities have been consulted and the paid the agreed compensation paid by GoSL - A Grievance Redress System will be put in place at the community level to provide avenues for groups to bring their grievances to the attention of the authorities for speedy resolution and feedback 	MoHS/WARDC	No Separate Cost <i>(These activities are established functions of MoHS and WARDC)</i>
	Selection of an inaccessible site to locate the cemetery will increase transportation costs for burial teams and make access to the cemetery difficult, in the event that the selected site has only one access and it becomes unmotorable	<ul style="list-style-type: none"> - A centrally located area in the vicinity of Western Area Rural and Western Area Urban Districts, the most urbanized and densely populous region in Sierra Leone, was selected as the site for Ebola Cemetery. - The cemetery can be accessed via multiple routes from the Freetown-Masiaka Highway 	MoHS/WARDC	No Separate Cost <i>(These activities are established functions of MoHS and WARDC)</i>

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		e.g. Sand-Sand Road and Banga Farm Road. This will enhance access to the cemetery		
	The cemetery location may be within or close to environmentally and socially sensitive areas such as fetish grooves and water bodies-with the possibility of corpses, digging of graves, and other activities contaminating water bodies	<ul style="list-style-type: none"> - An Environmental and Social Screening exercise was undertaken to ensure that environmentally and socially sensitive areas were avoided - A buffer will be established between the boundary of the cemetery and the existing creek based on the recommendation from the Environmental and Social Screening Exercise - The creek is located about 100 meters away from the boundary of the cemetery 	MoHS/WARDC	No Separate Cost <i>(These activities are established functions of MoHS and WARDC)</i>
Type of Facilities to be provided at the Ebola Cemetery	Lack of facilities such as a store, wash and changing rooms, toilets, water, and electricity will affect the functionality and increase exposure of burial to pathogens	<ul style="list-style-type: none"> - In addition to the construction of the fence the under listed will be undertaken to enhance the functionality of the cemetery: <ul style="list-style-type: none"> - construction of a store-room; - construction of two gatehouses with washroom; - construction of two (2) boreholes; - construction of bath and toilet facilities; - construction of a waiting area (shed) for burial teams-designed for universal access including changing rooms for burial teams; 		No Separate Cost <i>(Cost has been added to the total project cost in the BOQ)</i>

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		<ul style="list-style-type: none"> - construction of a shed (waiting area) - installation of four (4) solar-powered security lights, - installation of two (2) water reservoirs of 1000 liters capacity - installation of a generator. <p>- The facilities will be designed to meet the requirements of universal access by competent Engineers who will also supervise the construction of the same</p>		

Table 5.2: Environmental and Social Risks and Mitigation Measures during the Construction Stage

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
General construction activities - Noise and Air Pollution	Intermittent noise would be generated during the implementation of construction activities such as mixing concrete. Background noise levels at the site and its immediate environs may also increase intermittently due to the movement of delivery vehicles and haulage trucks entering or exiting the site during the	<ul style="list-style-type: none"> - Ensuring that the Contractor adheres to the manufacturer’s servicing and routine maintenance schedules for all construction equipment or services equipment once a month - Concrete mixers will be fitted with mufflers to minimize noise - Equipment and vehicles will be turned off when not in use 	Contractor	No Separate Cost (Cost captured as part of BOQ)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
	construction phase. This can inconvenience workers in the project vicinity.			
	Exposure to cement dust, emissions from paints, thinners, and other solvents as well as delivery vehicles can reduce ambient air quality and put site workers at the risk of respiratory tract diseases.	<ul style="list-style-type: none"> - Painters will be made to wear nose masks, gloves, overalls, and boots; - Equipment and vehicles will be turned off when not in use - Workers wearing appropriate Personal Protective Equipment (PPE) such as overalls, nose masks with HEPA filters, hand gloves, and earplugs, will undertake debagging of cement. - Haulage and delivery trucks as well as equipment on haulage routes will be made to drive at a speed of less than 20km/h - Trucks carrying sand and fine particles will be covered with tarpaulin 		
General construction activities – General pollution management	- Workers on site will generate human waste and refuse notably food residue. Poor housekeeping leading littering on-site, which can facilitate the outbreak and spread of sanitary-related diseases like cholera.	<ul style="list-style-type: none"> - Two (2) mobile toilets one (1) for males and one (1) for females and four (4) refuse colored bins will be provided on-site; - Mobile toilets will be dislodged after the close of work every day - Refuse will be collected by a private refuse collection company once a day 	Contractor	No Separate Cost (Cost captured as part of BOQ)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
	- Construction activities on site will produce waste such as excavated soils and redundant materials such as broken cement blocks and pieces of wood. The haphazard/poor collection and disposal of construction waste could obstruct the movement of the workers, construction equipment, and trucks on site with the potential to cause accidents on site.	<ul style="list-style-type: none"> - Construction waste e.g. sand and gravel will be used to backfill trenches, and foundation, where possible, while wood residue that can be used will be kept and re-used during formwork or sold. - Non-useable non-hazardous construction waste will be sent to the approved landfill site. 	Contractor	No Separate Cost (Cost captured as part of BOQ)
General construction activities – hazardous waste management	- Painting and solvents use will produce hazardous waste that can cause skin diseases upon human exposure and poisoning upon ingestion, especially if lead-based paints are used. These hazardous materials can also pollute nearby water bodies	<ul style="list-style-type: none"> - Empty paint and solvent containers will be collected and kept in a well-ventilated store room with a paved floor and returned to suppliers to be re-used; - Workers involved in painting will be made to use the appropriate PPEs e.g., gloves, nose mask, overalls, and boots - Lead-based paints will not be used during the project 	Contractor	No Separate Cost (Cost captured as part of BOQ)
General construction	- The works will create employment for contractors, who will intend to	- Preference should be given to the local community in terms of employment for semi-skilled and unskilled labor e.g. artisans	Contractor	No Separate Cost (Cost

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
activities – Labor issues	employ professionals, artisans, and laborers.			<i>captured as part of BOQ)</i>
	<ul style="list-style-type: none"> - Workers may be paid rates below the stipulated national minimum wage or may be working under poor service conditions without contracts - The Contractor may practice unfair/discriminatory recruitment practices (e.g., against women) and recruit unqualified persons to work on the site and subvert national labor laws, e.g., employ children and minors 	<ul style="list-style-type: none"> - All workers will be given contracts specifying the type of work they are to undertake and their remuneration package as well as the conditions of service in line with the Regulation of Wages and Industrial Relations Act 1971 (No. 18) - A grievance mechanism will be made available to all workers to report any issues associated with labor and working conditions - Contractual clauses (see Appendix F) against rape, defilement, and forms of Gender-Based Violence as well as child and forced labor and discrimination by sex, ethnicity, etc. will be inserted in the Contractor’s Contract document - Contractual clauses (see Appendix E) will be inserted in the Contract document prohibiting the Contractor/Consultant and their employees from Child Labor, which also makes reporting all Child labor cases to FSU office or the FSU representative on the Grievance Redress Committee binding on the Contractor and Supervising Engineer 		

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		<ul style="list-style-type: none"> - A Code of Conduct (see Appendix F for a sample Code of Conduct) will be prepared and signed by employees of the contractor to inform them of the sanctions for Child Labor - Workers will have access to an accessible participatory work-based grievance redress system with a focal point for reporting their grievances and receiving feedback (see Appendix K for a Sample Grievance Registration Form) 		
General construction activities – Occupational Health and Safety (OHS)	Work-related accidents such as burns falls and cuts may also occur due to human errors, workers not wearing appropriate PPEs required for their assignments, poor installation of equipment like ladders and mechanical faults on equipment as well as poor housekeeping.	<ul style="list-style-type: none"> - Site workers will be provided with PPEs (e.g. hard hats, safety boots, earplugs, reflectors, etc.) - The use of PPEs will be enforced at the site - Potable water will be provided for site workers at all times - Daily toolbox meetings will be organized for site workers - An Environmental, Social, Health, and Safety Officer will be employed by the Contractor to ensure compliance with occupational health and safety protocols on site e.g., wearing of PPEs and facilitating toolbox meetings and ensuring good housekeeping, among other roles 	Contractor	No Separate Cost (<i>Cost to be captured in BOQ</i>)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		<ul style="list-style-type: none"> - Prohibitive, warning, and directional signs will be provided on site - Clear sanctions and rewards for non-compliance and compliance respectively will be provided in the Code of Conduct to be signed by workers - Training of site workers in OHS, as well as hygiene, will be undertaken two times during the construction phase - The Contractor will notify the Supervising Consultant and the relevant authorities including SL-Police, Factories Inspectorate Department, IHPAU, and Local Council of any accident/incident within 12 hours of its occurrence. 		
General construction activities – traffic and road safety	Trucks carrying construction materials and furnishes to be installed may be involved in accidents leading to injuries, fatalities, and/or loss of property including livestock as well as cause traffic congestion. Haulage trucks may also cause noise and air pollution (dust and exhaust fumes) as they drive through untarred local	<ul style="list-style-type: none"> - Ensure that delivery trucks and construction vehicles drive below 20km/hr. speed limit - Trucks transporting friable materials (e.g. sand) will be covered with tarpaulin - The truck conveying construction equipment and materials to the construction zone will carry appropriate warning signals such as red flags and rotating amber lights 	Contractor	No Separate Cost (<i>Cost to be captured in BOQ</i>)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
	roads, rev their engines, and toot their horns.	<ul style="list-style-type: none"> - All construction vehicles will be embossed with identification numbers at the rear, front, and sides for easy identification - The Contractor will be responsible for cleaning up spillage on any road as well as fixing any damage to property, road, and/or utilities within the road space to the satisfaction of regulators and the Supervising Consultant within 24 hours of occurrence - The Contractor will notify the Supervising Consultant and the relevant authorities including SL-Police, IHPAU, and Local Council of any road accident within 12 hours of its occurrence 		
General Construction activities-Community Safety issues	Site workers may be exposed to pathogens including the SARS COV-2 virus (and potentially Ebola virus) can contribute to the community's spread of infectious diseases such as COVID-19. Poor housekeeping can litter the site and its immediate environs creating pools of stagnant water for the breeding of mosquitoes that cause	<ul style="list-style-type: none"> - All employees of Project Consultants, Contractors, and Sub-Contractors will be made to undergo sensitization on COV 19 preventive measures and symptoms based on the WHO guidelines - The Contractor is also required to ensure that construction workers and visitors who will come to the construction site will maintain a social distance of 2 meters. 	Contractor	No Separate Cost (<i>Cost to be captured in BOQ</i>)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
	<p>malaria and other sanitary-related diseases like cholera</p>	<ul style="list-style-type: none"> - The Contractor is required to provide veronica bucket with water, soap, hand sanitizer, and tissue paper for use by the workers at the site daily. - Workers will be provided with nose masks and the wearing of nose masks will be enforced. - An Environmental, Social, Health, and Safety Officer will be employed to ensure good housekeeping on site - 4 colored coded bins will be provided on-site which will be emptied twice a day 		
	<p>Construction equipment and trucks could be involved in accidents leading to injuries, fatalities and loss of property or may cause traffic disruptions.</p> <p>Movement of haulage and construction trucks may disrupt academic activities at KPM Secondary School with noise.</p>	<ul style="list-style-type: none"> - Delivery trucks and construction vehicles will be made to drive below the 20km/hr. speed limit - Material haulage and carting of construction waste will be undertaken before 7.00am and after 3.00pm when the school is not in session - The Contractor will inform the school authorities of any activity that will disrupt academic activities and cause adverse impacts at least 24 hours before its occurrence and undertake at least one (1) road safety awareness session for employees and students of KPM Secondary School - In addition to the formal vehicle registration numbers all construction vehicles, haulage trucks 		

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		<p>and equipment will be clearly embossed with two-digit identification numbers in front, at the back, and sides for easy identification</p> <ul style="list-style-type: none"> - The contractor will emboss the company's phone contact boldly on all vehicles and equipment - The Contractor will notify the Supervising Engineer and the relevant authorities including SL-Police, IHPAU, and Local Council of any road accident within 12 hours of its occurrence 		
<p>General construction activities - GBV/SEA/SH Issues</p>	<p>Site workers may lure young girls, and children and defile or rape them.</p> <p>Workers may also abuse their wives, partners, children, hawkers, petty traders, and food vendors physically or verbally over a misunderstanding over prices of goods and services and other issues.</p>	<ul style="list-style-type: none"> - Contractual Clauses (refer to Appendix E) on mandatory and regular training for workers on required lawful conduct and legal consequences for failure to comply with laws on non-discrimination and GBV will be provided at two times; - Contractual Clauses (see Appendix F with a commitment to cooperate with law enforcement agencies (FSU) investigating cases of gender-based violence will be inserted into the Bidding and Contract documents of the contractor and supervising Consultant - The Contractor will be required to consider alternative work schedules or shifts to accommodate the hiring of more female workers. 	Contractor	No Separate Cost (<i>Cost to be captured in BOQ</i>)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		<ul style="list-style-type: none"> - Contractual clauses (see Appendix F) against rape, defilement, and other Gender-based Violence as well as child and forced labor will be inserted into the contract of the Contractor and Supervising Consultant - Workers on site will sign a Code of Conduct (see Appendix F for sample Code of Conduct) with sanctions on rape defilement, abuse, and another gender-based violence - Two-(2) sensitization workshops will be undertaken for employees of the Contractor/Sub Contractors and Supervising Consultant. - The Ministry of Health and Sanitation will provide referral pathway and contact numbers of the nearest FSU office, One Stop GBV Center (Kinghamman Road Hospital-about 45 kilometers from the site), FSU representative on the Grievance Redress Committee in communities within the immediate project zone - GBV survivors will be guaranteed confidentiality and safety. Investigations and case management will only proceed if the survivor expresses their preference for these options after counseling 		

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		<ul style="list-style-type: none"> - The safety and confidentiality of the survivor will assured at all time during uptake, case management, investigations and reporting - Prohibition posters on sexual exploitation and harassment will be posted on and around the site. - The Contractor will paste the contact numbers FSU office, FSU representative on the Grievance Redress Committee, and GBV Service Providers on site 		
General construction activities – In case of encountering bones and or dead bodies	There is the possibility of the contractor and his workers encountering dead bodies/bones, especially during the digging of trenches for the foundation of structures	<ul style="list-style-type: none"> - Workers will stop work immediately, notify the Supervising Condon off and cordon off the site to the specification of the supervising engineer in the event that they encounter a corpse, grave or any other human remains during the works. - The Supervising Consultant will inform the District Medical Officer about the discovery of the bones/dead bodies - The District Medical Officer (DMO) will call in the MoHS Burial Team to rebury either the body part(s) or corpse at a new location based on the SL- Burial SOP (see attached in Appendix J) - After the reburial, the families of the affected corpse(s) will be notified by MoHS about the relocation and new location 	Ministry of Health and Sanitation	No Separate Cost (<i>Cost to re-burial to be handled by MoHS</i>)

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget (USD)
		- The DMO will then notify the project Supervising Engineer to instruct the Contractor to resume work.		
At the End of Construction	Failure to dismantle equipment and material residue after the execution of works can lead to accidents	<ul style="list-style-type: none"> - All temporary structures erected by Contractors will be dismantled; - Dismantled parts including wood pieces and sandcrete blocks will be arranged according to type and prepared for transportation to Contractors' workshops or sold to dealers for other civil works; - Unwanted wood residue and other waste will be hauled to the approved final disposal site at Waterloo. - All equipment and machinery that are usable will be moved to a new project site or sent to the Contractors packing yard. - Non-usable equipment and metals will be sold as scrap to the scrap dealers 	Contractor	No Separate Cost (<i>Cost to be captured in BOQ</i>)

Table 5.3: Environmental and Social Risks and Mitigation Measures during the Operational Phase

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget USD
General Ebola cemetery operation – Workers OHS issues	Workers at the Ebola cemetery including laborers at the cemetery will be exposed to pathogens including SARS COV-2 virus	<ul style="list-style-type: none"> -Appropriate PPEs including gloves, overalls, masks, face shields, and boots will be provided according to their work requirements -All workers at the Ebola cemetery will be vaccinated against communicable and infectious diseases such as SAR COV-2 and tetanus as recommended by the WHO guidelines -Daily inspections will be undertaken to ensure that workers are inappropriate PPEs. -Workers will be trained in the appropriate wearing and use of PPEs at least twice a year based WHO COVID guidelines on the appropriate use of PPEs and other GIIPs 	WARD C Environmental Health Office	<p>USD 2,000.00</p> <p><i>Cost covers the organization of four (4) occupational health and safety training for workers at the Ebola cemetery for two years @ USD500.00 per year</i></p>
General Facility operation -Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment	Staff of the Ebola cemetery as well as residents of the community may be perpetrators or survivors of rape and other GBV, SEA/SH incidents.	<ul style="list-style-type: none"> - A focal person will be appointed and trained in GBV/SEA/SH to receive GBV/SH/SEA complaints, sort and refer them to the nearest one-stop centers or services providers identified in the communities. - Referral pathway and Contact number of GBV/SEA//SH focal person will be pasted in the communities and on notice boards at the Ebola cemetery -Survivors of GBV/SEA/SH will be given the option to report directly to the nearest GBV Service Provider/health facility for medical 	Environmental and Social Officer (WARD C)	<p>USD 400.00</p> <p><i>Cost covers the sensitization on GBV/SEA/SH issues. for workers at the facility for two years USD 200 per year</i></p>

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget USD
		<p>examination/report or complain through the project for referral.</p> <ul style="list-style-type: none"> -Referral of GBV/SEA/SH for investigation and prosecution will be determined by the survivor's preference. The service providers will ensure the safety and security of the survivor in the process. -Where the perpetrator is a project employee, the project will commence an investigation on the employee in accordance with the accountability framework and CoC and deploy the relevant mitigation measures. - Burial teams, security wardens, and laborers at the Ebola cemetery will be sensitized on GBV/SEA/SH issues, GBV Manual, etc. 		
Ebola Cemetery operation – cleaning of the cemetery and related facilities and structures	Inappropriate cleaning and disinfection methods can expose workers, especially burial team members to infectious diseases, including COVID-19	<ul style="list-style-type: none"> - Cleaning staff will be provided adequate cleaning equipment, materials, and disinfectants e.g., sodium hypochlorite - A dedicated place will be provided within the washroom facility for the burial team to dispose of their PPE's after burial. - SL-SOPs for waste management prepared for the COVID-19 Emergency Response and Health Systems Preparedness Project based on the 	WARD C Environmental Health Officer	USD 1,050.00 <i>*(Cost covers the provision of PPEs e.g., gloves, overalls, nose masks, cutlasses, face shield, and boots for fifteen (15) staff (laborers)</i>

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget USD
		<p>WHO COVID-19 guidelines (see attached in Appendix G) will be implemented at the facility</p> <ul style="list-style-type: none"> - Cleaners will be provided with appropriate PPEs such as garments/gowns or aprons, gloves, eye protection (masks, goggles, or face screens), and boots or closed work shoes - *Cleaners will be trained twice every year in proper infection prevention, control, and health care waste management best practices (including handwashing prior to and after conducting cleaning activities; how to safely use PPEs, etc. 		<i>at the Ebola Cemetery @ USD 70.00 per staff per year for one year.</i>
Collection Storage, Transportation of General Waste	<ul style="list-style-type: none"> - Food residue and other waste will be generated by staff and burial team during the operational phase of the facility - Human waste will also be generated during the operational phase which if not properly treated will expose workers and the general public to pathogens. 	<ul style="list-style-type: none"> - Four (4) color-coded bins (black) will be provided within the facility - Refuse will be collected daily by a private entity and sent to the Waterloo landfill site - Liquid waste (black and grey water) will be channelled into in-situ septic tanks. - Septic tanks will be dislodged at least once a year or when it is full, whichever occurs earlier. 	WARDC Environmental Health Officer	USD 200.00 <i>Cost covers USD 200.00 for four (4) refuse bins (for the collection of general waste) @ USD 50.00 per bin,</i>

**After one year, the cost of PPEs will be integrated into the operational cost of the Ebola Cemetery to be borne by WARD C. Cost of training has been captured above)*

Table 5.4: Environmental and Social Risks and Mitigation Measures during the Decommissioning Phase

Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Responsible Party	Budget USD
Decommissioning	Inappropriate decommissioning of the cemetery in the future, when it is full, can lead to the resurgence of infectious diseases depending on the nature of future pandemics and infectious corpses that will be buried at the cemetery in future	<ul style="list-style-type: none"> - Before decommissioning the cemetery it will not be open to accepting new corpses for burial - Usable equipment will be disinfected and relocated to facilities indicated by MoHS. - The entire premises will be fumigated using trained gangs' inappropriate PPEs from MoHS. - After fumigation, the cemetery will be closed for one week before assigning use or demolishing the facilities on site. - The cemetery may be kept as a historical site or converted to a park as may be agreed among WARDC, MoHS, land owners, surrounding communities, and other relevant stakeholders - No activity involving excavation shall be undertaken on the site after decommissioning 	WARDC/ MoHS	Cost cannot be determined

5.3 Environmental and Social Monitoring

Ministry of Health and Sanitation has a project department-IHPAU. It will be solely responsible for the monitoring of the ESMP during the construction phase and at the end of the decommissioning phase. The Directorate of Environmental Sanitation and the Human Resource Management Office of the Ministry of Health and Sanitation will be responsible for operational phase monitoring.

Other institutions, namely, SL-EPA, Western Area Rural District Council (WARDC), and Ministry of Labor and Social Security (Factory Inspectors) may undertake ad-hoc monitoring of the environmental, social, health, and safety performance of the project. Relevant legislative instruments such as the Factories Act of 1974, The Local Government Act, of 2004, and the Environmental Protection Agency Act, of 2008 back the oversight and monitoring roles assigned to these agencies.

The World Bank will also undertake implementation support missions and recommend capacity strengthening and other measures in support of good environmental and social governance and industry practices. The monitoring roles of other non-state actors such as the public will also be complementary in ensuring smooth project implementation and sound environmental and social performance by the Contractor.

The environmental and social monitoring roles are presented in Table 5.4.

Table 5:5: Environmental and Social Monitoring Construction Phase

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
General construction activities - Noise and Air Pollution	<ul style="list-style-type: none"> Number of complaints of elevated noise, smoke, and dust levels Odor 	<ul style="list-style-type: none"> Daily 	<ul style="list-style-type: none"> Site Visits Inspections* 	<ul style="list-style-type: none"> MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> SL-EPA Supervising Engineer (Council)
General construction activities – Occupational Health and Safety (OHS)	<ul style="list-style-type: none"> Number, type, place, and time of accidents/incidents and/or near misses Number of OHS and hygiene training programs provided for contractors' employees. 	<ul style="list-style-type: none"> Daily 	<ul style="list-style-type: none"> Site Visits Contractor's Accident Records books Accident/Incident Reports 	<ul style="list-style-type: none"> MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> SL-EPA Supervising Engineer (Council)

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<ul style="list-style-type: none"> • Number of workers on site wearing the appropriate PPEs • Presence of Health and Safety Officer on-site or otherwise • Site workers level of compliance with OHS standards e.g., wearing of PPEs • Presence of First Aid Kits on-site or otherwise • Presence of functional Fire Extinguishers on Site • Presence of functioning handwashing facilities and hand sanitizers on-site or otherwise • Suspected and confirmed COVID-19 cases on site • Number of severe accidents reported to appropriate authorities e.g. IHPAU/MoHS within 12 hours of occurrence 				
General construction activities – General Pollution management	<ul style="list-style-type: none"> • The Presence of mobile toilets and refuse bins • Incidence of open defecation on the site and its environs 	<ul style="list-style-type: none"> • Daily 	<ul style="list-style-type: none"> • Site Visits • Inspections 	<ul style="list-style-type: none"> • MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> • SL-EPA • Supervising Engineer (Council)

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<ul style="list-style-type: none"> • Presence of littering on the site and its immediate environs • Number of times waste is lifted in a week • Clean site 				
General construction activities – Labor issues	<ul style="list-style-type: none"> • Number of Contractor employees with formal Contracts • Presence of under-aged workers (18 years and below) or otherwise • Number and type of employees recruited from the community by gender • Average monthly income of project workers and informal workers by gender • Presence of a code of conduct 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Site Visits • Inspection of Employees' Contracts 	<ul style="list-style-type: none"> • MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> • SL-EPA • Supervising Engineer (Council)
General construction activities – traffic and road safety	<ul style="list-style-type: none"> • Number of road accidents reported e.g. vehicle breakdowns, • Number of spills reported • Response time • Number of severe accidents reported to appropriate authorities e.g. IHPAU/MoHS within 12 hours of occurrence 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Accident Records books • Accident/Incident Reports 	<ul style="list-style-type: none"> • MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> • Supervising Engineer (Council) • SL-Police

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
General Construction activities- Community Safety issues	<ul style="list-style-type: none"> • Uptake point of complaints • The duration between case reporting, feedback, and case completion • The Average time is taken for the settlement of cases 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Grievance Redress Register • ACC Grievance Redress Platform 	<ul style="list-style-type: none"> • MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> • ACC Community Monitors
General construction activities - GBV/SEA/SH Issues	<ul style="list-style-type: none"> • Uptake points of complaints • Number of GBV/SEA/SH cases reported by type • Status of access to SEA/SH services. • Number of workers signing CoC • Number of workers and community sensitization on GBV/SEA/SH risks undertaken. • Number of communities and workers knowledgeable of GBV/SEA/SH Grievance processes and referral pathways. 	<ul style="list-style-type: none"> • Daily 	<ul style="list-style-type: none"> • Grievance Redress Register • ACC Grievance Redress Platform • Presence of Grievance Redress Register at the Ebola cemetery 	<ul style="list-style-type: none"> • MoHS (IHPAU Safeguards Unit) 	<ul style="list-style-type: none"> • SL-EPA • GBV Service Providers • ACC Community Monitors • Sierra Leone - FSU

Table 5:4: Environmental and Social Monitoring Operational Phase

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
General Facility operation – Workers' OHS/labor issues	<ul style="list-style-type: none"> • Number of burial team members and ancillary workers with Formal Contracts • Presence of under-aged workers (18 years and below) or otherwise • Availability and use of PPEs for burial teams and ancillary workers • Arrears of allowances for burial teams, laborers, security men, and ancillary workers or otherwise • Number of cases fraud and abuse of office cases reported 	Monthly	<ul style="list-style-type: none"> • Snap checks at the Ebola cemetery 	<ul style="list-style-type: none"> • MoHS (Directorate Environmental Health and Sanitation) 	<ul style="list-style-type: none"> • NA
General Facility operation - Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment	<ul style="list-style-type: none"> • The number of cases, • Presence of the functional GBV service providers, • Number of workers trained in GBV/SEA/SH • Number of workers who have signed the CoCs and otherwise • Number of workers/community focal persons sensitized and knowledgeable 	Monthly	<ul style="list-style-type: none"> • ACC Platform • Grievance Redress Grievance Register at the Ebola Cemetery 	MoHS (Gender Officer)	<ul style="list-style-type: none"> • FSU • GBV Service Providers

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	in the SEA/SH grievance mechanism and referral pathway				
Health Care Waste Management	<ul style="list-style-type: none"> • Presence of colored-coded bins at the cemetery • Waste placed in appropriate receptacles • Number of times waste is collected • Presence of overflowing receptacles • Availability and use of PPEs by laborers, burial teams, and security wardens at the cemetery • Number of burial team members train in SL-burial SOPs and relevant WHO COVID-19 guidelines • *Number of training programs undertaken for laborers, security wardens, and burial teams • *Number of accidents and/or incidents 	Daily	<ul style="list-style-type: none"> • Inspection 	<ul style="list-style-type: none"> • MoHS (Directorate Environmental Health and Sanitation) 	<ul style="list-style-type: none"> • NA
Emergency Response	<ul style="list-style-type: none"> • Presence of fire installations e.g., fire extinguishers, smoke detectors, etc. at the security post 	Monthly	<ul style="list-style-type: none"> • Inspections 	<ul style="list-style-type: none"> • MoHS (Directorate Environmental Health and Sanitation) 	<ul style="list-style-type: none"> • NA

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<ul style="list-style-type: none"> Number of workers trained in relevant Emergency Response Procedures Number of training programs undertaken Number of fire drills undertaken Number and type of accidents/incidents Number of accidents reported to WARD C Council/MoHS within 12 hours of occurrence 				

*During burials, epidemics, pandemics and disasters
NA- Not Applicable

5.4 Institutional Arrangements for Implementing the ESMP

a. Construction Phase

The Ministry of Health and Sanitation will be responsible for the construction/decommissioning phase environmental and social monitoring and reporting. The Ministry has the Integrated Health Project Administration Unit in charge of the responsibility of fiduciary and procurement under Bank funded projects. The Unit is also responsible for ensuring environmental and social management, monitoring, and reporting of Bank funded projects. IHPAU has a Safeguards Unit staffed with a Social Safeguards Specialist, an Environmental Safeguards Specialist, and a Waste Management Specialist. The IHPAU safeguards unit will be responsible for the construction phase environmental and social monitoring and reporting. The Unit will be solely responsible for the implementation of ESMP during the construction phase. The team at IHPAU will be responsible for:

- i. the insertion of relevant mitigation measures (to cost) in the bidding documents prior to its advertisement;
- ii. the insertion of the environmental and social clauses in the construction and supervision contracts;
- iii. review environmental reports submitted by the project contractors and supervising consultants during the construction phase on the agreed template/frequency/mechanism;

iv. monitoring the environmental, social, health, and safety performance (compliance and non-compliance) of works contractors during the implementation of the works; and

v. Enforcement of the requirements within the ESMP.

For GBV/SEA/SH prevention and response, the Family Support Unit of the Sierra Leone Police Force, the One Stop GBV Center at Kingherman Road Hospital, and the Ministry of Gender and Children Affairs will undertake training and case management. The Works Contractor, in addition to executing the works, will be responsible for honouring the environmental and social clauses in the Contract Document as well as implementing the construction phase mitigation measures in the ESMP.

b. Operational Phase

The Western Area Rural District Council will be responsible for operational phase maintenance including ensuring the provision of PPEs and cleaning materials and sanitary tools/equipment are provided and maintained at the Ebola Cemetery as well as ensuring that safeguards requirements are met at all times. The Council has Environmental Sanitation Officers and Environmental and Social Officers with the duty to ensure that the environmental, social, health, and safety requirements are met at all times at various facilities under the Ministry.

5.5 Environmental and Social Reporting and Disclosure

The Ministry of Health and Sanitation will disclose the ESMP on its website, once it is approved by the project and cleared by the World Bank. Hard copies of the ESMP shall also be placed at the Western Area Rural District Council, SL-EPA, and MoHS Head Office for public viewing throughout the construction phase of the project. The World Bank will disclose the ESMP on the World Bank's External Website.

As part of monitoring the ESMP, it is expected that the safeguards specialists at IHPAU will undertake monthly site visits and prepare monthly reports covering environmental, social, health and safety issues identified on site and immediate project environs using the risks/impacts identified in this report as thematic areas and other emerging ones. The monthly reports of the safeguards will also touch on the status of environmental and social mitigation measures as well as areas of non-compliance, timelines, and responsibility for compliance. The report shall include but not limited to:

- i. Contractors' performance in implementing environmental and social mitigation measures;
- ii. Progress on implementing mitigation measures in relation to the identified impacts;
- iii. Non-Compliance issues;
- iv. Emerging impacts and proposed mitigation measures (if encountered);
- v. A presentation on parameters monitored in the reporting month;
- vi. Complaints/Grievances and their state of resolution; and

- vii. Activities to be taken in the next month.

The Contractor will also dedicate a chapter in their monthly progress report to present the state of the environmental and social safeguards issues on the sub-project. This will be reviewed and validated by the Safeguards Specialists at IHPAU. IHPAU will report on environmental and social issues as part of the quarterly reports to the Bank.

5.6 ESMP Budget and Sources of Funding

The estimated cost for implementing this ESMP and environmental and social monitoring, outside the works contract price is estimated to Nine Thousand, Six Hundred and Fifty United States Dollars (USD 9,650.00). Table 5.5 presents the summary cost estimates and the proposed sources of funding.

Table 5.5: Budget for ESMP Implementation

#	Item	*Amount (USD)	Source of Funding
1.	General Facility Operations – Workers' OHS Issues	2,000.00	Project
2.	General Facility Operations – GBV/SHE/SH	400.00	Project
3.	General Facility Operations – Cleaning	1050.00	Project
4.	General Facility Operations – Waste collection, storage, and transportation	200.00	Project
5.	Transportation and Honorarium for Council Engineer and Environmental Health Officer for Supervision and Monitoring of the Works (@USD 1,000.00 per month for 6 months)	6,000.00	Project
6.	Total	9,650.00	-

**Cost build-up details can be found in Table 5.1 to 5.4*

CHAPTER SIX

6.0 EMERGENCY RESPONSE PROCEDURES ON SITE

Response measures have been proposed for the following emergencies, which may arise during project implementation:

- Fire;
- Medical or Accident; and
- Oil Spills.

6.1 Fire Emergency

6.1.1 Small Fires

Small fires are put out quite safely. A simple fire-fighting procedure to put out a small fire is provided below:

- The first person to sight the fire must sound the fire alarm at the premises of the Ebola cemetery or shout, 'FIRE!! FIRE!! FIRE!'
- Workers trained to use fire extinguishers are permitted to fight fire on site;
- All others must evacuate the area;
- Tackle fire in its very early stages at the source;
- Always put your own and other people's safety first;
- Make sure you can escape if you need to and never let a fire block your exit;
- Never tackle a fire if it is from a position against the prevailing wind direction and if the source cannot be determined. If in an enclosed area such as workshop/office premises, never tackle a fire if it is starting to spread or has spread to other items in the room or if the room is filling with smoke;
- If the situation is solved, the Environment, Social Health, and Safety Officer of the Contractor will investigate the reason for the fire and clean the place; and
- Report to the Supervising Engineer for the necessary precautionary measures to be undertaken.

6.1.2 Large Fires

These are fires that cannot be put out by trained fire volunteers and the SNFS will have to be called to fight them. The evacuation procedures to follow include:

- The first person to sight the fire must sound the fire alarm if at the premises or shout, 'FIRE!! FIRE!! FIRE!'
- Evacuate the building or area and report at the ASSEMBLY POINT;
- Immediately notify the Environment, Social Health and Safety Officer of the Contractor and call the National Fire Force;
- Contact numbers of the nearest fire station will be conspicuously displayed at offices, storerooms, workshops, and security posts;

- The Environment, Social Health, and Safety Officer of the Contractor has to check on the remaining workers and carry out a fast, calm, and secured evacuation;
- A head count will be conducted to ensure all workers are safe and present;
- If there have been any casualties, they will be conveyed to the nearest health facility; and
- Keep records of any injuries and the fire event and report to the Supervising Consultant

6.2 Accidents

In the event of any accident or injury, the procedures to follow include:

- If it is a minor accident/injury and the victim can move, he/she should report to the Environment, Social, Health, and Safety Officer of the Contractor;
- The Environment, Social, Health, and Safety Officer of the Contractor, who is trained in administering first aid, will treat the injury;
- He/ She will decide if the victim needs further treatment at the Medical Center and if so will arrange for the victim(s) to be sent to the nearest health facility immediately;
- The Environment, Social Health, and Safety Officer of the Contractor will investigate and take records of the accident/injury including the source and cause of the accident/injury;
- If the accident/injury is such that the victim cannot move by him/herself but can be moved, the workers present should assist the victim to the Environment, Social Health and Safety Officer of the Contractor to administer first aid and arrange for the person to be sent to the nearest health facility immediately. If the accident/injury is such that the victim cannot be moved, the workers present should put him in a stable condition and immediately call the Environment, Social Health and Safety Officer of the Contractor to immediately arrange for medical staff from the nearest health facility to be brought to the site to attend to the victim (s). All accidents and injuries will be recorded by the Environment, Social Health, and Safety Officer of the Contractor and reported to Supervising Consultant.

6.3 Bites

The following should be undertaken in the event of snake bites and stings from scorpions and other reptiles:

- Identify the type of snake/scorpion e.g. color, length (if possible, take a picture from a safe distance)
- Keep calm, sit down in a position where the bite is below the level of the heart, and call for help, if required.
- Undertake the under-listed procedures and inform the Environmental, Social, Health, and Safety Officer:
 - Remove rings and watches before swelling starts;

- Wash the bite with soap and water;
- Cover the bite with a clean, dry dressing;
- Mark the leading edge of tenderness/swelling on the skin and write the time alongside it (or keep the time in mind).
- Transport the victim to the nearest health care facility in a vehicle (the victim should not drive him/herself) for antivenom as soon as possible.

The victim should not undertake the following listed below:

- pick up the snake or try to trap it;
- wait for symptoms to appear if bitten, get medical help right away;
- apply a tourniquet;

- slash the wound with a knife or cut it in any way;
- try to suck out the venom;
- apply ice or immerse the wound in water;
- drink alcohol as a painkiller;
- take pain relievers (such as aspirin, ibuprofen, naproxen); and
- apply electric shock or folk therapies.

6.4. Oil/Solvent Spills

Oil spills may involve spillages of fuel and lubricants which may occur while in storage or use on hard surfaces (concreted/ tiled/paved floor) such as at storage sheds/rooms, workshops, or on the ground.

6.4.1 Spillage on Hard Surface

Immediately contain the spillage using saw dust provided at the site to prevent it from spreading. Collect the used sawdust, wash the surface with a lot of water and disinfectant and report to the Environment, Social Health and Safety Officer of the Contractor who will decide the appropriate disposal of the used sawdust. If the spilled product gets into contact with any part of the body, quickly wash the body part with a lot of clean running water and immediately report it to the Supervising Consultant.

6.4.2 Spillage on the Ground

The following should be undertaken in case of fuel/oil/lubricant or paint spillage on the ground:

- Immediately use a shovel to scoop the contaminated soil into a container.
- Ensure to scoop beyond the contaminated area to ensure no contaminated soil is left uncollected.
- Immediately report to the Environment, Social Health and Safety Officer of the Contractor and dispose of the contaminated soil at the approved landfill site;

- If the spilled product gets into contact with any part of the body, quickly wash the body part with a lot of clean running water and immediately report to the Environment, Health and Safety Officer (of the Contractor); and
- Report the incident to the Supervising Consultant.

CHAPTER SEVEN

7.0 Basis for Grievance Redress Mechanism

The consultation processes showed that the execution of the project will generate environmental and social concerns notably excessive noise and dust generation and accidents involving the workers in the nearby offices and the public. These will create some grievances that must be addressed.

7.1 Grievance Redress Process

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs, and project conditions and scale. In its simplest form, grievance mechanisms can be broken down into the following primary components:

- Receiving and registering a complaint;
- Screening and assessing the complaint;
- Formulating a response;
- Selecting a resolution approach;
- Implementing the approach;
- Announcing the result;
- Tracking and evaluating the results;
- Learning from the experience and communicating back to all parties involved; and
- Preparing timely reports to management on the nature and resolution of grievances.

7.2 Management of Reported Grievances

The procedure for managing grievances should be as follows:

- The affected person will file his/ her/their grievance(s), relating to any issue, verbally, in writing, or via telephone (number yet to be established)
- To the project environmental and social officer of MoHS (see Appendix F for a Sample Grievance Redress Form for recording grievances). Where such is written, the grievance note should be signed and dated by the aggrieved person. Where complaints are received via phone, the call recipient should document all details;
- Where the affected person is unable to write, the focal persons will write the note on the aggrieved person's behalf;
- Any informal grievances will also be documented
- The Anonymity and confidentiality of persons who lodge grievances will be protected.

7.3 Monitoring Complaints

The Social Safeguards Specialist at IHPAU will be responsible for:

- Providing the Grievance Redress Reports detailing the number and status of complaints;
- Any outstanding issues to be addressed;
- Monthly reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints, and initiator of such action.

7.4 Grievance Redress Institutions

A four-tier grievance redress mechanism has been designed in the event of dissatisfaction with any aspects of project implementation. These are:

7.4.1 Community/Facility Level Focal Persons

Two focal persons (one male; one female) will be nominated to act as community focal persons. Their roles will be to receive and transmit grievances to the Sub Project Redress Committee and provide feedback to aggrieved parties. They will also provide information about the project to the general public. The focal persons will be the first point of contact between the project and the general public and staff.

During the operational phase of the project, the focal person at Western Area District Council Cemetery will be maintained.

Upon notification of a grievance, a Focal Person shall complete the Complaint Form and also the Grievance Registration Form (see Appendix J for Sample Grievance Form), which will be given to the aggrieved party. If the grievance is within the remit of the focal persons, they will resolve it and document the resolution in the Closeout Form to be co-signed by the aggrieved party and sent to the Sub Project Grievance Redress Committee. If the grievance is beyond the focal person, they will escalate it to the Sub Project Grievance Redress Committee within 2 days.

Alternatively, the ACC Community Monitor in the project beneficiary community can be contacted to receive and record grievances.

7.4.2 Sub-Project Grievance Redress Committee (GRC)

A Sub-Project Grievance Redress Committee will be set up by the project. The committee will receive, investigate and provide feedback on grievances that are beyond the Focal Person or when aggrieved persons are not satisfied with the feedback, they receive from the Focal Person upon lodging a grievance with him/her. The committee will be made up of:

- A representative of the MoHS (Social Safeguards Specialist at IHPAU);
- The Supervising Consultant;
- A representative of the Western Area Rural District Council (WARD C);
- A representative of Kissi Town;
- A women representative from Kissi Town;
- A representative of the Aggrieved Party;

- A representative of FSU;
- A representative of a local GBV Service Provider;

The functions of the grievance redress committee will be to receive, investigate and resolve issues with the Contractor. The aggrieved party or parties is/are required to channel their grievances to the GRC through any means including verbal narration, telephone calls, text messages, and letters. The Committee will sit as and when complaints are lodged. The grievance redress process, at this level, shall follow the chain below in resolving grievances, including introducing any other initiatives that could complement the effectiveness of the process:

- i. Receive grievances (logging);
- ii. Acknowledgment of grievances;
- iii. Verification, investigation, negotiations, and actions;
- iv. Monitoring and evaluation;
- v. Provide Feedback to parties;
- vi. Agreement secured, and
- vii. Signing off.

Grievance will be received and transmitted to an official form and the applicant will be duly notified within 3 days of lodging a complaint. If the grievance can be resolved by the Grievance Committee, corrective actions will be determined. After the case is evaluated and corrective action determined, the proposed solutions or corrective/preventive actions shall be discussed with the complainant together with the timeframe for the implementation of the corrective/compensation measures. If the resolution of the grievance requires a commitment beyond the Grievance Redress Committee, the members shall coordinate and consult with relevant authorities. The party responsible for implementing the corrective measures shall be recorded in the Grievance Closeout Form. Once an agreement has been reached between the applicant and the party responsible for the corrective actions, the applicant will be asked to sign off the grievance closeout form. If the applicant remains dissatisfied with the outcome, additional corrective action will be agreed on and carried out by the responsible party. The Grievance Redress Committee will have to address the grievance it receives within 5 working days.

7.4.3 Project Level Grievance Redress Committee

If the Sub Project Level Grievance Redress Committee fails to resolve a grievance, a second appeal shall be lodged at the Project Level GRC domiciled in the EOC. The Project Level Grievance Redress Committee shall follow similar processes as the Sub Project Level GRC. The Project Level GRC will consist of:

- The CMO-Chairman;
- A representative of the One Health Platform;
- A head of IHPAU;

- A representative of the Ministry of Women Children and Social Protection;
- Social Safeguards Expert at IHPAU - Secretary and Focal Person;
- Representative FSU of SL-Police;
- National level GBV Service Provider; and
- Representative of the PAPs.

If the Project Level Grievance Redress Committee fails to resolve an issue, then the aggrieved person can petition the Ministry of Health and Sanitation. Duration for resolving a grievance at the Grievance Redress Committee at the EOC shall normally be a maximum of twenty (20) working days. The Committee shall seek guidance and refer specialized cases to the relevant State Authorities. All GBV/SEA/H issues will be reported to FSU of the SL-Police for investigation and prosecution.

7.4.4 Honourable Minister, Minister of Health and Sanitation

Aggrieved parties who are dissatisfied with the outcome of the first two processes can petition the Honourable Minister, Ministry of Health, and Sanitation directly.

7.4.5 The Courts

It is anticipated that the number of cases, which may need to be referred for redress, will be relatively small and that only the first and second tiers of the redress mechanism may need to be activated. The mediation process shall be confidential, transparent, and objective, as well as accountable, easy, fast, accurate, and participatory. However, if the aggrieved party is not satisfied with the outcomes from the three tiers he/she/they have the right to go to the law court at their own expense.

7.5 Anti-Corruption Commission (ACC) Platform

Grievance may also be filed via the ACC Report Center. The Anti-Corruption Commission was created through the Anti-Corruption Act, of 2000 as an independent commission to investigate government corruption. The establishing Act was amended in 2008 to provide protection for whistle-blowers. The Commission investigates and provides feedback on matters of perceived corruption bribery and abuse of office. Although the headquarters is in Freetown, the Commission has District Coordinators, who act as focal persons in the various Councils as well as Community Monitors stationed in various communities-who to receive and record complaints from aggrieved parties/whistleblowers and submit them to their respective District Coordinators and receive feedback from same to aggrieved party/parties.

The Commission has a digital platform with a report center that can be reached on a toll-free hotline (515) using text messaging, voice, and video calls. The platform receives sorts and tracks grievances and provides feedback to aggrieved parties after investigations. The system can also generate status reports of lodged complaints on demand.

Persons with grievances/concerns or evidence of poor service delivery, discriminatory practices, bribery, GBV/SEA/SH, perceived corruption, and abuse of office under the project can also submit their grievances via the Commission's electronic platform (Report Center) for the necessary investigations and actions to be taken by the appropriate government agencies and NGOs. The platform also provides feedback via its electronic loop or the District Coordinators and Community Monitors. The ACC Community Monitors have been trained under the COVID-19 Emergency Preparedness and Response Project on how to receive, sort and transmit grievances.

7.6 Grievance Redress Mechanisms for GBV Survivors

The proposal is to report any GBV/SEA/SH to the trained GBV/SEA/SH focal persons at the community level, FSU representative on the Sub Project Grievance Redress Committee, and or the nearest GBV Service Provider or FSU office for the necessary investigations and survival support services. Community Focal Persons will ensure confidentiality and refer survivors to the nearest FSU Office or GBV Service Provider if the survivor indicates a preference for investigations and/or case management. Contact numbers of the nearest GBV Service Provider, FSU representatives as well as that of the nearest FSU offices will be displayed at various places on site and within the project environs together with posters and flyers to encourage GBV survivors to come out and report cases of GBV. Reporting a GBV/SEA/SH incident will be at the discretion of the survivor. The nearest One Stop GBV Center that provides comprehensive GBV services including medical, legal, and psychosocial service is located at Kingharman Road Hospital in Freetown (about 45 kilometers from the Cemetery Site).

IHPAU Social Specialist will follow up to monitor and confirm the status and quality of service provision to the survivors.

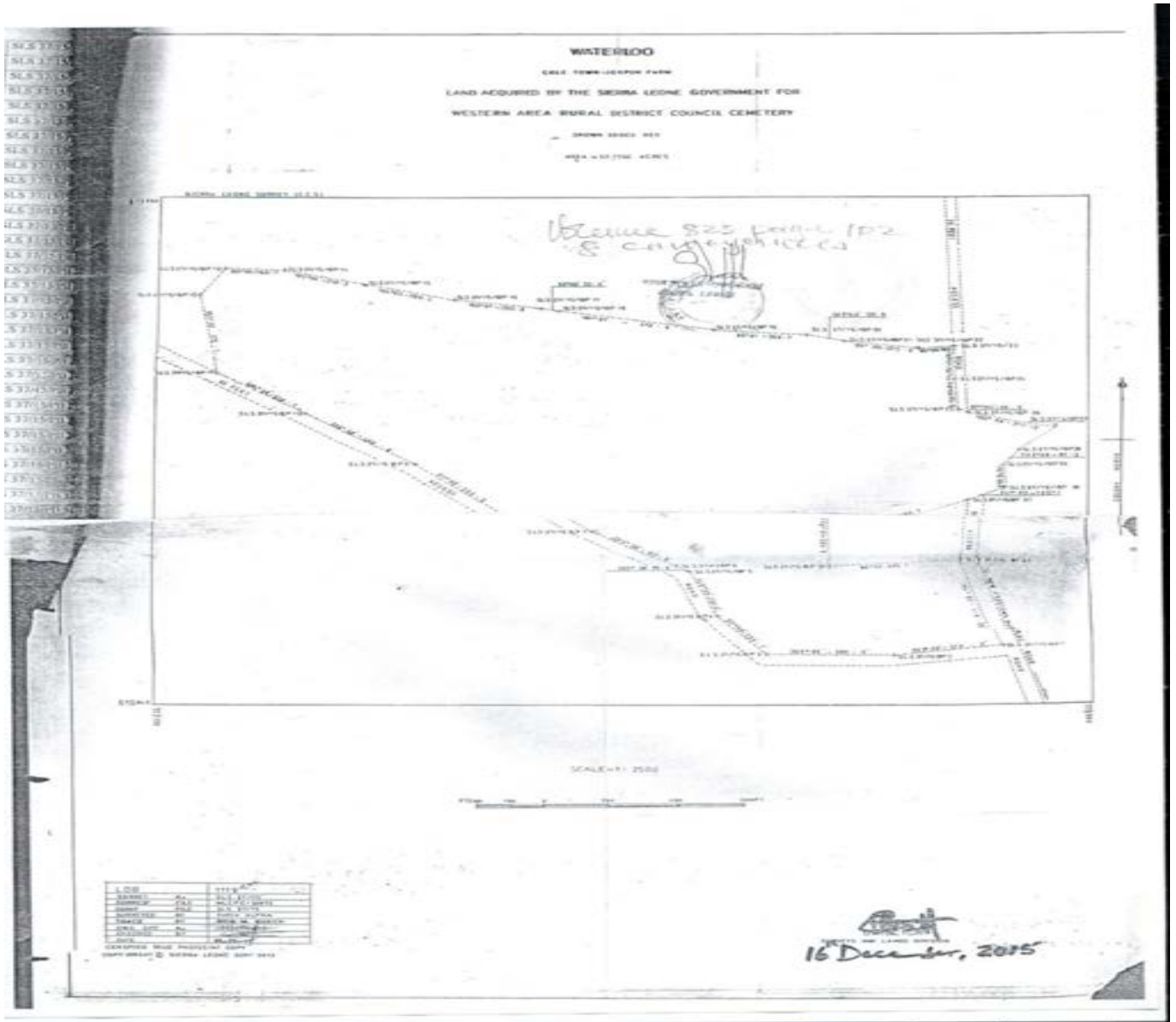
7.7 Grievance Redress Mechanisms for Workers on Site

The proposal is to establish a hotline that aggrieved workers can call to register their grievances directly to the management level personnel of the Construction Firm that will be implementing the works. This contact number must be advertised so that workers are aware of it and encourage to use it without being intimidated or targeted for negative feedback. Workers may also lodge their grievance in writing or verbally through the Environment, Social, Health and Safety Officer of the Contractor or to the Supervising Engineer.

When aggrieved party/parties is/are not satisfied with the outcome from management, he/she/they can petition the Minister for Labor and Social Welfare. If the above institutions fail to deliver satisfactory outcomes for the aggrieved party/parties, he/she/they can precede to the law court. Similar processes and timelines for resolving community grievances are proposed for the workers' grievance system.

APPENDICIES

APPENDIX A: SITE PLAN



APPENDIX B: LOCATIONAL MAP-EBOLA CEMETERY



APPENDIX C: SITE AND ITS ENVIRONS



APPENDIX D: PICTURES

Plate 1: Site Visit to Ebola Cemetery with Official of WARDC



Plate 2: A Section of Ebola Cemetery with Graves



Plate 3: Natural Drainage that Empties into the Creek



Plate 4: The Creek about 100 meters North of the Site



Plate 5: People walking through the Cemetery (Thoroughfare)



Plate 6: Dilapidated Two-Seater Toilet formerly used by Burial Teams



Plate 7- KPM Secondary School - Land mark



Plate 8: Meeting with Officials at WARD C



Plate 9: Community Meeting



Plate 10: Community Meeting



APPENDIX E: CONSULTATION SHEETS

CONSULTATIONS WITH BOLIMA COMMUNITY ON THE COVID-19 RESPONSE PROJECT – FENCING OF WARD CEMETERY, WATERLOO.		
MINUTES OF MEETING		
Date: Saturday, 14th December, 2021	Location: Bolima Cemetery, Waterloo, WARRDC	Time: 11:30 am
Attendees: 17		
AGENDA		
1.00	INTRODUCTION	
2.00	ISSUES	
3.00	CLOSING	

Minute No.	Minute	Action By
1.0	<p>INTRODUCTION</p> <p>The meeting commenced at 11:30am with a silent prayer. Then there was self-introduction of all attendees. The IHPAU Safeguards Team was made up of Mrs. Juliana Kamanda-Senior, Social Safeguards Specialist, Head of the Environmental and Social Safeguards Unit of Integrated Health Project Administration (IHPAU) of the Ministry Health and Sanitation, Dr. Emmanuel Abeke, Environmental and Social Safeguards Technical Advisor at IHPAU, and Francis Koroma – Environmental Safeguard Specialist at IHPAU.</p> <p>Afterwards, the Headman, Ward Committee Chairman, Youth Chairman and including key Stakeholders including women of the Bolima Community did self-introduction.</p> <p>The purpose of the meeting was introduced by Mrs. Juliana Kamanda-Senior, Social Safeguards Specialist, Head of the Environmental and Social Safeguards Unit of IHPAU. She told attendees that the meeting was to discuss issues relating to the proposed Fencing of the WARD CEMETERY at Bolima Community. She went further to explain the reasons for fencing of the Bolima Cemetery due to encroachment of the cemetery land, the land dispute between families which has now been solved by the purchase of the entire cemetery area (52 Acres) from 3 families by the Government of Sierra Leone through the Ministry of Finance. He then referred the details on the role of IHPAU Safeguards team in World Bank Projects. Key risks/issues (1) people passing through the cemetery and (2) friends of the dead found within the cemetery compound.</p> <p>Dr. Abeke explained the scope of the project to the attendees. He indicated that the Ministry of Health and Sanitation together with the WARD C intends to Fence the WARD C Bolima Cemetery with support from the World Bank COVID-19 Response Project. The project will involve (a) excavation ie. Land clearing and earthwork, (b) Ground Blinding with concrete, (c) Concrete Work ie. Construction of retaining wall, (d) Still Bending (e) Cement Block Moulding and Laying and construction of WASH facilities and erection of Solar Lighting facilities at strategic locations within the</p>	

Minutes of Consultations with Residents of Bolima Cemetery in WARD C 14th December, 2021

Minute No.	Minute	Action By
	<p>Cemetery Compound. The construction works will take 6 months.</p> <p>He indicated that the proposed works would be associated with some risks, adverse impacts and inconvenience during construction phase. He further mentioned that some of the inconveniences, adverse impacts and risks might include intermittent noise and air pollution, accidents and more importantly, Gender Based Violence. He indicated that these adverse environmental and social impacts are likely to affect workers, visitors and residents of the project vicinity. Hence, their presence at the meeting to discuss these issues and jointly find solutions/common grounds to these adverse impacts and inconveniences. He revealed that the meeting is part of the consultation aspect of the Environmental and Social Assessment, which must be completed before the project can take off.</p>	
2.0	<p>ISSUES DISCUSSED</p> <p>Inconveniences Dr. Abeka also indicated that some level of inconveniences would be created due to the blocking of the access road passing through the cemetery. When asked "How many people use the Cemetery Access Road?", response: all of representative claim to use the access road and went further to state that they have other alternative roads, which can be used to access their communities (Bolina, Korea, Jopo Farm, etc.). Dr. Abeka asked another question, "What can we do for people to access the communities around the cemetery?" response 1: PRO Osman, the fencing of the cemetery is a very important, because it will reduce risks posed by criminals who use the cemetery for meetings and attacking people. It is simple to use the other access road. Response 2: all including the aged, youth and women agreed to use the other access road at the back of the cemetery.</p> <p>Livelihoods Youth are found within the Cemetery helping with the cleaning, digging of graves and providing security at the cemetery. This Youth are commonly called "Friends of the Dead". Dr. Abeka asked, how can the Friends of the Dead be useful towards the Construction and Operation Phase of the propose project? Response 1. Mr. Julius Mattia representing the WARDC suggested that they can be used as unskilled labourers during</p>	<p>IHPAU Safeguards Unit/Community</p> <p>IHPAU Safeguards Unit</p>

Minutes of Consultations with Residents of Bolina Cemetery in WARDC 1st December 2021

Minute No.	Minute	Action By
	<p>Construction Phase and Cemetery Security during Operational Phase. Response 2. Mr. Abu Bakarr Kargbo – Headman of the Bolima Community support Mr. Mattia's view and stress the need to engage the youth " Friends of the Dead". Response 3. Mr. John Obi Metzger – Youth Chairman of Bolima Community also stressed the need to support the Youth and explained the economic challenges Youth in the Bolima Community encounter.</p> <p>Dr. Abeka in response to the Council Rep, Headman and Youth Chairman supports their views and went further to explain that it will be great economic loss and security implication if the youth " Friends of the Dead" are not fully engaged during the construction and operational phase. He went further to explain that the IHPAU Safeguard Team will engage WARDC, MoHS and World Bank Safeguard Team for the possible engagement of these youths.</p> <p>Accidents and Incidents</p> <p>Dr. Abeka indicated that during the construction phase, accidents might also occur involving the Contractor's equipment and haulage trucks. These can lead to injuries and possibly death. He further mentioned that they should report such accident to the focal persons. He also mentioned the setting up of a grievance redress committee prior to the commencement of works. It will have representation from the community, WARDC, the Supervising Consultant, Contractor, Women representative from the community, representative of complaints among others. The recommendations of the Grievance Redress Committee will be binding on the Contractor.</p> <p>He went on to say that, the Grievance Redress Committee would investigate and resolve minor cases referred to it by the focal persons and report to the Social Safeguards Specialist at IHPAU. If they fail to do so, the matter will be referred to IHPAU where a panel will put together to look into it and resolve it. Contacts of the IHPAU Social Safeguards Specialist, focal persons and Community Grievance Redress Committee member will be displayed at strategic locations in the community and other vantage points in the Community so that people are aware and take complaints to them when necessary.</p> <p>He made it clear the Contractor will be responsible repairing/compensating for all damages and infractions arising out of his/her activities. These may include damage to shops, ruminants and hospital bills of people injured by construction</p>	

-4-

Minutes of Consultations with Residents of Bolima Cemetery in WARDC 14th December, 2023

Minute No.	Minute	Action By
	<p>vehicles and equipment, so they should report any accident or incident to the nominated focal persons for the necessary investigation and actions to be undertaken.</p> <p>Safety Dr. Abeka, stated that a Health Safety Officer will be appointed by the contractor to ensure that accidents are minimized and receive and investigate accidents/incidents.</p> <p>He explained that if for nothing residents will feel more comfortable reporting grievances to the community focal persons than the Health and Safety Officer of the Contractor.</p> <p>Gender Based Violence (GBV) Issues Dr. Abeka also explained that the risk of Gender Based Violence that may arise out of project implementation. He said that the site workers would be in the community for only a short time. They may lure young girls, women, and rape and defile them. When this happens, he stressed, the need to notify the authorities. He further explained that focal persons (one male and one female) would be nominated from the communities (Bolina, Korea, Jago Farm, etc) to receive grievances including those related to GBV/SEA/SH. The Principal Environmental Health Officer, Mr. Julius Mator should submit names of focal persons from the different communities to be collecting GBV related complains. These focal persons will be trained by the INPAU Safeguards Unit on how to receive and handle GBV/SEA/SH cases. He advised the group that the focal persons should be well known, accessible and respected in the community.</p> <p>Mrs. Kamanda interjected and indicated that although survivors have an option to choose whether they want to proceed with the case or not, GBV cases should be reported within 24 hours of their occurrence at least so they can be documented by INPAU. Documentation shall be anonymous. She further added that verbal and other forms of abuses and bad behavior by site workers should also be reported to the focal persons.</p> <p>Mrs. Kamanda also emphasized that GBV issues, notably, defilement and rape are serious crimes and not reporting and properly dealing with they can have serious implications for the project including suspension of the rehabilitation works and other projects in the health portfolio. Therefore, they should not shield</p>	<p>Principal Environmental Health Officer/ WARDC/Chairman of the District Council</p> <p>INPAU Safeguards Unit</p>

Minutes of Consultations with Residents of Bolina Cemetery in WARDC 14th December, 2023

Minute No.	Minute	Action By
	<p>perpetrators and attack survivors over the fear that they will lose the project, if they speak up. Rather by covering up for perpetrators, they risk losing the project.</p> <p><u>ESMP and Disclosure Issues</u> Mrs. Kamanda told the gathering that the process of consultation is part of the Environmental and Social Assessment. The discussions will be captured in a report called the Environmental and Social Management Plan, which is reviewed and approved by the World Bank. Copies will be made available at WARDC and even here at the facility for anybody who wants to read to do so upon approval by the World Bank.</p>	
3.0	<p><u>CLOSING</u> After opportunity was given to each participant to ask a question, the IHPAU team thanked participants and the meeting ended at 13.16 pm.</p>	

Recorder: Emmanuel Abeka (IHPAU)

Approved by:

IHPAU Representative:

Julyana Kamanda
Head of Safeguards
Name

J. Kamanda
Signature

28/1/22
Date

Chief Administrator, WARDC
ALHASSAN KILLAH
Name

Alhassan Killah
Signature

28-01-22
Date

Name

Signature

Date

Community Representative:

Name *ABU BAKARR KARGBO*
VILLAGE HEAD - BOLIMA

Signature

Abu Bakarr Kargbo

Date 28-01-2022

APPENDIX F: CONTRACTUAL CLAUSES

In order to ensure the proposed mitigation measures are implemented by the Contractor as well as other responsible parties, the following Contractual Clauses are to be inserted into the Works Contract for the Contractor executing the works:

General

1. In addition to these general conditions, the Contractor shall comply with any specific Environmental and Social Management Plan (ESMP) for the works for which he/she is responsible. The Contractor shall inform himself about such an ESMP and prepare his work strategy and plan to fully incorporate relevant provisions of that ESMP. If the Contractor fails to implement the approved ESMP after written instruction by the Supervising Engineer to fulfil his obligation within the requested time, the client reserves the right to arrange through the SE for execution of the missing action by a third party on account of the Contractor.
2. Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an EMSP. In general, these measures shall include but not be limited to:
 - *Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, vibrating equipment, temporary access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities.*
 - *Ensure that noise levels emanating from machinery, vehicles, and noisy construction activities (e.g. excavation) are kept at a minimum for the safety, health, and protection of workers within the vicinity of high noise levels and nearby communities.*
 - *Prevent oils, lubricants and wastewater used or produced during the execution of works from entering rivers, streams, and other natural water bodies/reservoirs, and also ensures that stagnant water in uncovered trenches is treated in the best way to avoid creating possible breeding grounds for mosquitoes.*
 - *Upon discovery of ancient heritage, relics or anything that might or believed to be of archaeological or historical importance during the execution of works,' immediately report such findings to the Supervising Engineer so that the appropriate authorities may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.*
 - *Implement soil erosion control measures to avoid surface run off and prevents siltation, etc.*
 - *Ensure that garbage, sanitation and drinking water facilities are provided for construction workers.*

- *Ensure that, in as much as possible, local materials are used to avoid importation of foreign material and long-distance transportation.*
 - *Ensure public safety and meet traffic safety requirements for the operation of work to avoid accidents.*
3. The Contractor shall indicate the period within which he/she shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.
 4. The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan/strategy to ensure effective feedback of monitoring information to project management so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.
 5. Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the client will appoint an officer to oversee the compliance with these environmental, social, health and safety conditions and any proposed mitigation measures. State authorities such as the Environmental Protection Agency and Sierra Leone Fire Force, Western Area Rural District Council (WARDC) and Ministry of Works and Public Assets may carry out similar inspection duties. In all cases, as directed by the Supervising Engineer, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy of rehabilitation/mitigation carried out on the biophysical and social environment resulting from implementation of any works.

Water Resources and Waste Management

6. All vessels (drums, containers, bags, etc.) containing oil/ fuel/ construction materials and other hazardous chemicals shall be bonded in order to contain spillage. All waste containers litter and any other waste generated during construction shall be collected and disposed of at designated disposal sites in line with the Council/national waste management regulations.
7. Wash water from washing equipment shall not be discharged into drains
8. Used oil from maintenance works shall be collected and disposed-off appropriately at designated sites or be reused or sold for re-use locally.
9. Site spoils and temporary stockpiles shall be located away from the drainage system and surface run off shall be directed away from stockpiles to prevent erosion.
10. The Contractor shall at all costs avoid conflicting with water demands of local communities.
11. Abstraction of water from wetlands shall be avoided.
12. There shall be no sourcing of materials within at 200 meters from the banks of any waterbody
13. No construction water, containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses and waterbodies.

Disposal of Unusable Elements

14. Unusable materials and construction elements such as electro-mechanical equipment, pipes, cables, accessories and demolished structures will be disposed of in a manner approved by the Supervising Engineer (SE). The Contractor has to agree with the SE which elements are to be surrendered to the Client's premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.
15. Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.
16. Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.
17. Left over materials will be collected and used for other purposes.

Health and Safety

18. The Contractor shall appoint a qualified environment, social, and health and safety officer to enforce environmental, social, health and safety regulations on site and ensure compliance with the Project ESMP on site.
19. In advance of the construction work, the Contractor shall mount an awareness and hygiene campaigns.
20. Workers and local residents/students shall be sensitized on health and safety risks associated with the works including prevention of COVID-19, HIV-AIDS, Malaria, Fire Prevention and Containment as well as Community/Occupational Health and Safety
21. The Contractor shall make available all his/her employees for all OHS and Emergency Preparedness Training/Demonstration Programs organized under the project.
22. Adequate warning, directional and prohibitory signs etc. shall be provided at appropriate locations on and around the site.
23. Construction vehicles shall not exceed maximum speed limit of 20km per hour.

Gender Based Violence, Sexual Exploitation and Abuse/ Sexual Harassment, HIV/AIDs and STI Awareness

24. The Contractor shall clearly state in his contracts with employees and third-party suppliers that he does not condone physical abuse, rape, defilement, illicit sexual behaviours and other gender based violence together with sanctions for breaching these provisions.
25. The Contractor shall report any incidence of rape, defilement or other Gender Based Violence and illicit sexual affairs to the nearest FSU, the SE and Environmental and Social Officer of MoHS within 12 hours of receiving such as a report.
26. The Contractor shall support (including availing employees to support GBV investigations and providing compensation for survivors) GBV/SEA/SH investigations, persecution and survivor rehabilitation, if his/her employees are under investigation or found guilty of GBV/SEA/SH.

27. The Contractor shall make available all his/her employees for all HIV/AIDS and Gender Based Violence Sensitization Programs organized under the project.
28. The Contractor shall have a Code of Conduct to be signed and explained to their workers in a language well understood. The Code of Conduct will include all punitive measures for any violations.

Contractor's Environment and Social Management Plan

29. Within 4 weeks of signing the Contract, the Contractor shall prepare an ESMP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an ESMP for the works. The Contractor's ESMP will serve two main purposes:
 - *For the Contractor, for internal purposes, to ensure that all measures are in place for adequate HSE management, and as an operational manual for his staff.*
 - *For the Client, supported where necessary by a SE, to ensure that the Contractor is fully prepared for the adequate management of the HSE aspects of the project, and as a basis for monitoring of the Contractor's HSE performance.*
30. The Contractor's ESMP shall provide at least:
 - *A description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in the ESMP;*
 - *A description of specific mitigation measures that will be implemented in order to minimize adverse impacts;*
 - *A description of all planned monitoring activities and the reporting thereof; and*
 - *The internal organizational, management and reporting mechanisms put in place for such.*
31. The Contractor's ESMP will be reviewed and approved by the Environmental and Social Officer before start of the works. This review should demonstrate if the Contractor's ESMP covers all the identified impacts and has defined appropriate measures to counteract any potential impacts.

Environmental and Social Reporting

32. The Contractor shall prepare bi-weekly progress reports to the SE on compliance with these general conditions, the project ESMP, and his own ESMP. A format for a Contractor ESMP report is given below. It is expected that the Contractor's reports will include information on:
 - *HSE management actions/measures taken, including approvals sought from local or national authorities;*
 - *Problems encountered in relation to HSE aspects (incidents, including delays, cost consequences, etc. as a result thereof)*

- *Changes of assumptions, conditions, measures, designs, and actual works in relation to HSE aspects; and*
 - *Observations, concerns raised and/or decisions taken about HSE management during site meetings*
33. Reporting of significant HSE incidents must be done within 24 hours. Such incident reporting shall, therefore, be done individually.
34. The Contractor shall keep his own records on health, safety and welfare of persons, and damage to property. These records shall include such records, as well as copies of incident reports, as appendixes to the bi-weekly reports.
35. Details on the environmental and social performance will be reported to the Client through monthly progress reports.

Labor Relations

36. The Contractor shall not employ minors (below 18 years) as part of his casual or permanent employees
37. The Contractor shall not engage in forced labor of kind including forcing employees to work on statutory holidays
38. The Contractor shall not procure goods or services from third party suppliers that that engage child or forced labor
39. The Contractor in his recruitment shall not discriminate by gender, religion and ethnicity etc.
40. The Contractor shall familiarise himself with the Regulation of Wages and Industrial Relations Act 1971 (No 18) and other labor related laws in Sierra Leone and work within these laws.
41. All workers shall be given contracts specifying their tasks, responsibilities and Conditions of Service in line with Sierra Leone Labor Laws
42. The Contractor shall set up a fair and transparent work-based grievance redress system headed by a management member and protect aggrieved employees against discrimination and persecution.
43. The Contractor shall prepare a Code of Conduct to be signed by all employees, after it being explained to them in a language they understand, to guide employees inter and intra personal relationships. The Code of Conduct shall specify sanctions for assault, abuse, rape defilement and other gender-based violence as well as rewards and sanction for working with/out PPEs among others.

Community Relations

44. The Contractor shall inform organizations and households in the project zone of any impending disruptions at least a week ahead. The notice shall be repeated 24 hours ahead of the planned disruption.

Cost of Compliance

45. It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental Management Conditions" in the Bill of Quantities covers these costs. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable environmental and social impact.

Sanction

46. In application of the contractual agreements, the lack of respect of the environmental and social clauses, duly observed by the Contractor, could be a justification for termination of the contract.

APPENDIX G: SAMPLE CODE OF CONDUCT

All the employees of the Contractor and support staff of Supervising Consultant shall adhere to the following Code of Conduct during the execution of the project:

1. Compliance with Applicable Laws, Rules and Regulations

- a. All employees shall perform their duties in accordance with the Regulation of Wages Industrial Relation Act, 1971 (No.18) and other applicable labor laws in Sierra Leone.
- b. Employees/key experts will enjoy freedom of association and expression as defined in the Constitution of Sierra Leone and express in the Regulation of Wages Industrial Relation Act, 1971 (No.18) and other labor laws in Sierra Leone.
- c. The Organization will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery.
- d. The Organization shall not permit any activity that fails to stand the closest possible public scrutiny.
- e. Employees uncertain about the application or interpretation of any legal requirements should refer the matter to appropriate line supervisor or the Ministry of Labor Social Security
- f. Workers/employees who falsify their ages will be summarily dismissed as the company does not tolerate child and forced labor.
- g. The company will not tolerate any form of child or forced labor from any sub-contractor/employee who practice forced or child labor
- h. Employees are required to report suspected cases of child or forced labor on site to IHPAU Social Safeguards Specialist, FSU or Ministry of Labor and Social Security

2. Compliance with Applicable Health and Safety Requirements

- a. All employees' have the right and duty to ensure safe working conditions to the extent of exercising control over tools, equipment, machinery and processes and to express their views on working conditions that may affect their safety and health. Sub-contractors will do same for their employees
- b. Employees of the Contractor shall be responsible for removing themselves from danger as much as possible whenever they have good reason to believe that there is an imminent and serious danger to their safety or health. They should have the duty so to inform their supervisor immediately.
- c. Employees/key experts will be provided with the appropriate protective gear for the operations or activities and request for same before engaging in any activity associated with the works.
- d. No worker shall be allowed to undertake any work without wearing approved protective clothing/gear.
- e. Workers shall use and take care of personal protective equipment, protective clothing and facilities placed at their disposal and not misuse anything provided for their own protection or the protection of others
- f. First time offenders who are not in the appropriate protective gear will receive a verbal caution, second time offenders will receive a formal written caution, while multiple offenders will receive sanctions ranging from suspensions to dismissal.
- g. Except in an emergency, employees, unless duly authorized, should not interfere with, remove, alter or displace any safety device or other appliance furnished for their protection or the protection of others, or interfere with any method or process adopted with a view to avoiding accidents and injury to health.
- h. Every employee shall take reasonable care for their own safety and health and that of other persons who may be affected by their acts or omissions at work;
- i. Workers shall report to their immediate supervisor, and Health and Safety Officer, any situation which they believe presents a risk and which they cannot properly deal with themselves;
- j. Damaged or faulty electrical equipment such as power sockets, leads and appliances are removed from service.
- k. Damaged or faulty equipment should be replaced, or repaired by a qualified person as soon as possible.
- l. Power points should be protected by safety-shutters, or all vacant power points be covered by plastic plug protectors.
- m. Electrical appliances and leads should be kept away from water.

- n. All machines and vehicles should be turned off when not in use
- o. All employees shall comply with all the safety and health measures prescribed by the employer. Employees should not operate or interfere with plant and equipment that they have not been duly authorized to operate, maintain or use.
- p. Employees should not sleep or rest in dangerous places such as scaffolds, railway tracks, garages, or in the vicinity of fires, dangerous or toxic substances, running machines or vehicles and heavy equipment.
- q. Supervisors should not assign employees to undertake activities that the later do not have necessary competence, training or certification or that has not been stated in their contract with the Company.
- r. Employees should not undertake any assigned activity for which you do not have necessary competence, training or certification or that has not been stated in their contract with the Company.
- s. Every employee is encouraged to contribute by integrating environmental sustainability issues as they relate to our industry into our business planning, strategies and decision-making.
- t. Employees shall avail themselves for all OHS, COVID-19/HIV/AIDS Gender Based Violence, Emergency Preparedness Training/Sensitization Programs organized under the project.
- u. All Company employees should strive to conserve resources and reduce waste through re-use and other energy conservation measures.

3. Use of Illegal Substances

- a. No employee/key expert/sub-contractor shall report to work under the influence of alcohol or any substance considered as illegal under the laws of Sierra Leone including marijuana.
- b. No employee shall smoke, consume alcohol or illegal substances while on duty, including lunches and during overtime meals, or on company property.
- a. Officers and directors may authorize, in advance, the consumption of alcohol for special occasions or for certain business meetings as long as such use is limited and does not violate other legal requirements.
- b. No employee shall under any circumstance engage in any work related to the organization under the influence of Alcohol or illegal substances even if consumption is permitted under the exception described above.
- c. Employees who violate this smoking and alcohol conduct standard may have their contract terminated.

4. Non- Discrimination

- a. Discrimination against any job applicant or employee on the grounds of color, race, religion, age, nationality, sex, marital or family status, ethnic affiliation, pregnancy, sexual orientation, disability or other reason is prohibited.
- b. In certain cases, however, the requirements of safety regulations relating to specific positions/activities within a construction business will take precedence over clause 4(a).
- c. We do not employ any person below the legal minimum age (18 years) and will require commitments from suppliers and subcontractors to refrain from such practices
- d. Workers are not to undertake any assigned activity for which they do not have necessary competence, training or certification or that has not been stated in their contract with the Company.
- e. Recruitment, job transfer and progression, remuneration and training and award of discretionary bonuses when applicable are determined solely by the application of objective criteria, fair and unprejudiced opinion, personal performance and merit.
- d. Recruitments, transfers, training, maternity leave and standard terms and conditions will be done in accordance within line Sierra Leone Labor laws.
- e. Employees who perceive that they have been discriminated against can seek redress through their supervisor, Environmental, Health and Safety Officer, management and/or the Ministry of Labor and Social Welfare

5. Interaction with Community

- a. The Company strives to cultivate a local identity in each of its host communities by setting good corporate citizenship standards, while respecting local sensitivities.
- b. The Company will regularly contribute to the economic and social development of communities, and expects all employees to promote human rights and respectful community involvement anywhere it operates.
- c. Employees should comply with the norms, laws, rules and regulations applicable to the host communities except in cases where they are in conflict with that of Sierra Leonean laws.
- d. In a case where an employee perceives that the laws, rules and regulations of host communities are in conflict with that of the company, employees are to refer such cases to their supervisor, Environment, Health and Safety Officer or manager for further clarification at the Ministry of Labor and Social Security

6. Sexual Harassment

Sexual Harassment would be considered as unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes

situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the survivor

- a. Sexual harassment is unlawful.
- b. This company does not tolerate sexual harassment in any form.
- c. Every employee has a responsibility to ensure that sexual harassment does not occur.
- d. No employee shall under any circumstance sexually engage another either by the use of words or actions. Some acts that may be considered as sexual include;
 - *an unwelcome sexual advance*
 - *a request for sexual favors*
 - *unwelcome comments about someone's sex life or physical appearance*
 - *sexually offensive comments, stories or jokes*
 - *displaying sexually offensive photos, pinups or calendars, reading matter or objects*
 - *sexual propositions or continued requests for dates*
 - *physical contact such as touching or fondling, or unnecessary brushing up against someone*
 - *Indecent assault, defilement or rape (these are criminal offences).*
- e. Any employee who believes he or she has been a target/survivor of sexual harassment is encouraged to inform the offending person orally or in writing that such conduct is unwelcome and offensive and must stop or to report the unwelcome conduct as soon as possible to a supervisor, management or the IHPAU Social Safeguards Specialist officer, FSU representative on the Project Grievance Redress Committee or the nearest FSU of the Sierra Leone Police Force
- f. Reports of sexual harassment will be treated promptly, seriously and confidentially.
- g. Complainants have the right to determine how a complaint will be treated and knowledge of the outcome of investigations.
- h. Anyone found to have sexually harassed another person will be handed over to the Family Support Unit of the Sierra Leone Police Force.
- i. No employee will be treated unfairly as a result of making a complaint of sexual harassment. Immediate disciplinary action will be taken against anyone who victimizes or retaliates against someone who has made a complaint of sexual harassment.

- j. For the purposes of reporting and dealing with sexual harassment and crimes, the Company will provide a hot line to a management level personnel for reporting cases of sexual abuse and harassment.
- k. Rape, defilement and assault cases shall be reported to FSU of the Sierra Leone Police Force by survivor or other employees'

7. Violence or Exploitation

- a. No employee shall bear any weapon on site unless he/she has been authorized and have a legitimate business reason to do so. Even so, this will have to be with the permission of the appropriate supervisor, manager and conformity with the laws of Sierra Leone.
- b. The company is committed to maintaining a safe and secure workplace and working environment. Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, and similar activities are not tolerated.
- c. Employees who engage in acts or threats of violence, outside of self-defense, shall be dismissed and handed over to the Sierra Leone Police Force.
- d. Employees are expected to treat all individuals with respect, tolerance, dignity and without prejudice to create a mutually respectful and positive working environment.

8. Protection of Children

- a. As much as possible, employees' are to avoid bringing any person under 18 to work on the project site) unless with permission from Environment, Health and Safety Officer.
- b. Every employee shall himself be responsible for the safety and wellbeing of any person under age 18 years brought to work by them. *Physical contact with children can be misconstrued both by the recipient and by those who observe it, and should occur only when completely nonsexual and otherwise appropriate, and never in private.*
- c. One-on-one meetings with a child or young person are best held in a Public area; in a room where the interaction can be (or is being) observed; or in a room with the door left open, and another employee or supervisor is notified about the meeting.
- d. Avoid any covert or overt sexual behaviors with children on site. This includes seductive speech or gestures as well as physical contact that exploits, abuses, or harasses.
- e. Employees are to provide safe environments for children and youth at all times on site

9. Sanitation Requirement

- a. The company shall provide and maintain sanitary facilities (according to building regulations) for all employees to ensure their total health and safety. All such facilities shall be labelled with inscription in English for the understanding of every employee.
- b. Every employee/key expert shall be responsible for the appropriate use of sanitary facilities including toilets, bathrooms and refuse bins/skip containers where provided.
- c. No employee shall resort to other inappropriate means of defecation or urination (open defecation or indiscriminate disposal of refuse or urination on the company's compound or project site) apart from what has been prescribed by the company.
- d. Any act of indecency with respect to the use of sanitary facilities shall attract punitive actions including suspensions or even dismissals.

10. Avoidance of Conflict of Interest

- a. The Company expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Organization.
- b. Employees/key experts must not use their positions or the knowledge gained as a result of their positions for private or personal advantage.
- c. Regardless of the circumstances, if employees sense that a course of action they have been pursued, or are presently pursuing, or are contemplating pursuing may make it difficult to perform the work objectively, they should immediately communicate all the facts to their supervisor.
- d. An Employee or a member of his or her immediate family shall not receive improper personal benefits as a result of his or her position in the Company.
- e. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company should be disclosed promptly to supervisors/ managers.

11. Protection and Proper Use of Property

- a. All employees unless otherwise directed are responsible for the proper acquisition, use, maintenance and disposal of company assets (e.g., materials, equipment, tools, real property, information, data, intellectual property and funds) and services. Acquisition of assets should be in compliance with procurement standards of the company.
- b. Any act of theft, carelessness, and waste on the part of an employee shall attract sanctions including the termination of one's work contract.
- c. Every employee shall do their part to protect the company's assets and ensure their efficient use.

- d. Unless otherwise permitted by management, Company guidelines and procedures, the appropriation of Company property by employees for personal use, or for resale is strictly prohibited.
- e. Similarly, you are not permitted to use your authority over other employees to use Company resources for personal benefit.
- f. On termination of and at any other time during your employment when requested you must hand over Company's assets and records stored in whatever format or medium.
- g. The Company strictly prohibits any access, usage or disclosure of employees' personal data without legitimate authorization. Employees should note that the Company reserves the right to retrieve their e-mails transmitted via the Company e-mail accounts and to monitor your use of the Internet.
- h. Every employee shall use company assets only for legal and ethical activities.

12. Report of Violation of Code of Conduct

- a. Employees should promote ethical behavior and encourage other employees to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation.
- b. In order to protect our organization from unethical or illegal activity, it is your duty and obligation at all times to be watchful of the practices that you see occurring around you, to take reasonable steps to prevent or detect improper conduct, and to report any suspicion of fraudulent, abusive, unethical or illegal activity.
- c. All reports of misconduct or unethical behavior, conflict of interest, or illegal activity be are to handle such cases as confidential and be treated seriously and discreetly.
- d. Employees may report anonymously should that be their preference.
- e. In the event of a grievance being raised to a manager relating to discriminatory behavior or harassment, the manager must notify Human Resources immediately, irrespective of how trivial the complaint may appear.

13. Non-Retaliation

- a. The company will not tolerate any act of retaliation against anyone who, in good faith, reports known or suspected unethical or illegal misconduct, seeks advice, raises a concern, or provides information in an internal or external investigation or legal proceeding pertaining to the company.
- b. Allegations of retaliation will be investigated, as appropriate.
- c. Acts of retaliation (which may include firing or laying off, demoting, denying overtime or promotion, disciplining, denying benefits, failing to hire or rehire, intimidation or making threats) may lead to disciplinary action against the

person responsible for the retaliation, up to and including termination of contract.

- d. Any employee who believes he/she has experienced retaliation, should report to his/her supervisor, manager or the Social Safeguards Specialist at IHPAU.
- e. Any false accusation of retaliation would attract disciplinary actions even to the extent of termination of contract.

Implementation of Code of Conduct

- a. The Environment, Health and Safety Officer of the Contractor will be responsible for implementing and enforcing the Code of Conduct, while monitoring
- b. The following measures will be adopted to implement the Code of Conduct:
 - The Consultant will ensure that all employees/key experts and sub-contractors are given copies of the Code of Conduct for reference.
 - All employees on the assignment will be made to sign the Code of Conduct.

APPENDIX H: STANDARD OPERATING PROCEDURES FOR HEALTH CARE WASTE MANAGEMENT-COVID-19: SIERRA LEONE

Introduction

COVID -19 spreads through direct contact and droplets to an infected person. One way of preventing the spread of the virus is by practicing proper waste management especially from respiratory excreta of the infected person.

There is no evidence that direct, unprotected human contact during the handling of health care waste has resulted in the transmission of the COVID-19 virus. However, all health care waste produced during the care of COVID 19 patients should be collected safely in designated containers and bags, treated, and then safely disposed of or treated, or both, preferably on-site.

The safe handling of waste generated through the care of patients with COVID- 19 is based on three main principles:

- 1) Segregation, safe containment and packaging of waste should be performed as close as possible to the point of generation.
- 2) Limit the number of personnel handling generated waste before and after primary containment.
- 3) Always use appropriate personal protective equipment (PPE) and procedures for handling waste until final treatment and disposal.

Objective of the SoP

The main objective of this SoP is to outline in a concise manner directives to personnel, charged with the responsibility of collecting, storage, transportation and disposal of health care waste to prevent the transmission of COVID -19 emanating from these wastes

SCENARIOS:

SCENARIO 1. Management of COVID-19 WASTE at the quarantine homes, Isolation, laboratory and treatment centers in phases one and two of the outbreak.

SCENARIO 2. Management of COVID-19 health care waste in the event of community spread of the disease.

SCENARIO 1.

A. WHAT NEEDS TREATMENT AND DISPOSAL

- Respiratory secretion, used masks, paper tissues, gauze and any other materials used during cough and sneezing
- Disposable needles and syringes and disposable or non-reusable protective clothing
- Treatment materials and dressings

- Non-reusable gloves

- Laboratory supplies and biological samples
- Used disinfectants

SCENARIO 1.

C. AT COLLECTION POINTS

- Place non-sharps solid waste in the biohazard bag. Bags should not be filled beyond two thirds full to allow safe closure.
- Carefully place sharps waste in appropriate disposable sharps container and close the container. Containers should not be filled beyond three thirds full to allow safe closure.
- Prepare filled bags and sharps containers for onsite inactivation
- Place closed sharps containers in a biohazard bag.
- Close the bag with a method that will not tear or puncture the bag (e.g., tying the neck of bag with a goose-neck knot) and will ensure no leaks.
- Apply disinfectant (wipe or spray) to the outside surface of the closed bag.
- Place the wiped/sprayed closed bag into a second biohazard bag.
- Close the bag with a method that will not tear or puncture the outer bag and will ensure no leaks (e.g., tying the neck of bag with a knot).
- Apply disinfectant (wipe or spray) to the outside surface of the secondary bag.
- Store the disinfected closed bags in a designated area to await removal.
- Follow recommended procedures for disinfecting visibly soiled PPE and taking off PPE.
- The healthcare workers wearing PPE should spray or wipe the outside surfaces of double-bagged waste disinfectant immediately before removing waste from the room.
- Upon removing the double-bagged waste from the patient's room, the healthcare worker should place the double-bagged waste in a designated transport cart (for onsite inactivation or a rigid outer receptacle)
- The designated container should be located at the periphery of the area for taking off PPE so that removal from the area is efficient and does not create a risk of recontamination of the outer container.
- Environmental cleaning personnel removing the waste from the care area should only handle the outer container/transport cart and should never open the container or handle the double-bagged waste.
- For onsite treatment, disinfection personnel wearing appropriate PPE should
- Safely transfer waste in a transport cart to dedicated waste autoclave room or secured storage location or incineration area.

SCENARIO 1.

D. AT DISPOSAL POINTS

Select Site for disposal of COVID- 19 Contaminated solid Waste

- Select a disposal point (incinerator/burning pit) on the health facility grounds
- Disposal point should be fenced
- It should be located away from the normal traffic flow and should be fenced, should have a lockable door, the site should not be in public view or in an area where it will attract crowd.

SCENARIO 1.

E. PROCEDURES FOR HANDLING LIQUID WASTE (BODY FLUIDS INCLUDING BLOOD, URINE, VOMIT, FAECES)

- Primary handling of liquid waste should occur in the patient's room and be performed by the primary healthcare workers wearing recommended PPE as designated in the guidance for Isolation, Treatment and Quarantine Facilities.
- Pour waste, avoiding splashing by pouring from a low level, into the toilet.
- Close the lid first, and then flush toilet.
- Clean and disinfect flush handles, toilet seat, and lid surfaces with chlorine
- Discard cleaning cloths in biohazard bags.
- Discard emesis and portable toileting containers as solid waste.
- Follow recommended procedures for disinfecting visibly soiled PPE and removal of PPE.

SCENARIO 1.

F. ON-SITE TRANSPORTATION

- 1) Wear an appropriate set of PPE and heavy duty/rubber gloves and goggles when handling infectious waste.
- 2) Infectious solid waste should not be transported by hand due to the risk of accident or injury from infectious material or incorrectly disposed sharps.
- 3) Use a covered trolley or a wheeled bin with a lid to reduce the potential for exposure
- 4) Collect wastes including sharp containers (puncture resistant safety boxes) from all generating points at least twice a day or when containers are $\frac{3}{4}$ full or whenever necessary
- 5) For infectious waste generated in laboratories (e.g. specimens and specimen's containers, pipettes, etc.), pre-treat by autoclaving or chemical disinfection prior to transporting it for final treatment/disposal
- 6) Start with non- infectious waste followed by infectious waste

- 7) After each use, all surfaces of the trolleys or bins should be disinfected with 0.5 % chlorine solution
- 8) Wash hands properly after removing PPE

SCENARIO 1.

G. TREATMENT OF COVID 19-CONTAMINATED WASTE

- Wear appropriate PPE
- Recommended Disposal Methods: Disinfect liquid waste (including patient reparatory excreta) with 2% chlorine solution and then dispose of in an isolated latrine or toilet set aside for COVID 19 cases. (NB: Avoid splashing when disposing of liquid infectious waste)
- Burning is the recommended method for disposal of other COVID 19-contaminated waste. Using an incinerator or a pit for burning can make a safe and inexpensive disposal system.
- There should be well trained staff to manage waste generated at Isolation, Treatment and Quarantine Facilities.
- Decontaminate the area in case of spillage around the incinerator/burning pit with 0.5% chlorine solution
- Conduct regular cleanliness, decontamination, maintenance and repairs of the incinerator
- Decontaminate any used receptacles
- Remove ashes from the incinerator and put in the ash pit
- Put a layer of soil on top of ashes
- Wash hands after removal of PPE

SCENARIO 2.

Management of COVID-19 waste at community level

- If the number of positive COVID-19 cases increases and there is evidence of community spread and where there is widespread use of face masks and proper disposal is observed within communities, all households and citizenry should be encouraged to segregate waste at all point of generation.
- Risk communication
- Training and Selection of Youth Groups and waste collectors should be conducted across the country.
- Locally made incinerators should be utilised at the designated dump sites for incineration of used masks and PPEs

APPENDIX I: INFECTION PREVENTION AND CONTROL PROPOTOL

(Adapted from the Center for Disease Control Interim Infection Prevention and Control Recommendations for patients with confirmed COVID-19 or persons under investigation for COVID-19 in Healthcare Settings)

HEALTH CARE SETTINGS

1. Minimize Chance of Exposure (to staff, other patients, and visitors)

- Upon arrival, make sure patients with symptoms of any respiratory infection to a separate, isolated and well-ventilated section of the health care facility to wait, and issue a facemask
- During the visit, make sure all patients adhere to respiratory hygiene, cough etiquette, hand hygiene and isolation procedures. Provide oral instructions on registration and ongoing reminders with the use of simple signs with images in local languages
- Provide alcohol-based hand sanitizer (60-95% alcohol), tissues and facemasks in waiting rooms and patient rooms
- Isolate patients as much as possible. If separate rooms are not available, separate all patients by curtains. Only place together in the same room patients who are all definitively infected with COVID-19. No other patients can be placed in the same room.

2. Adhere to Standard Precautions

- Train all staff and volunteers to undertake standard precautions - assume everyone is potentially infected and behave accordingly
- Minimize contact between patients and other persons in the facility: health care professionals should be the only persons having contact with patients and this should be restricted to essential personnel only
- A decision to stop isolation precautions should be made on a case-by-case basis, in conjunction with local health authorities.

3. Training of Personnel

- Train all staff and volunteers in the symptoms of COVID-19, how it is spread and how to protect themselves. Train on correct use and disposal of personal protective equipment (PPE), including gloves, gowns, facemasks, eye protection and respirators (if available) and check that they understand
- Train cleaning staff on most effective process for cleaning the facility: use a high-alcohol based cleaner to wipe down all surfaces; wash instruments with soap and water and then wipe down with high-alcohol based cleaner; dispose of rubbish by burning etc.

4. Manage Visitor Access and Movement

- Establish procedures for managing, monitoring, and training visitors
- All visitors must follow respiratory hygiene precautions while in the common areas of the facility, otherwise they should be removed

- Restrict visitors from entering rooms of known or suspected cases of COVID-19 patients' Alternative communications should be encouraged, for example by use of mobile phones. Exceptions only for end-of-life situation and children requiring emotional care. At these times, PPE should be used by visitors.
- All visitors should be scheduled and controlled, and once inside the facility, instructed to limit their movement.
- Visitors should be asked to watch out for symptoms and report signs of acute illness for at least 14 days.

CONSTRUCTION SETTINGS IN AREAS OF CONFIRMED CASES OF COVID-19

1. Minimize Chance of Exposure

- Any worker showing symptoms of respiratory illness (fever + cold or cough) and has potentially been exposed to COVID-19 should be immediately removed from the site and tested for the virus at the nearest local hospital
- Close co-workers and those sharing accommodations with such a worker should also be removed from the site and tested
- Project management must identify the closest hospital that has testing facilities in place, refer workers, and pay for the test if it is not free
- Persons under investigation for COVID-19 should not return to work at the project site until cleared by test results. During this time, they should continue to be paid daily wages
- If a worker is found to have COVID-19, wages should continue to be paid during the worker's convalescence (whether at home or in a hospital)
- If project workers live at home, any worker with a family member who has a confirmed or suspected case of COVID-19 should be quarantined from the project site for 14 days, and continued to be paid daily wages, even if they have no symptoms.

2. Training of Staff and Precautions

- Train all staff in the signs and symptoms of COVID-19, how it is spread, how to protect themselves and the need to be tested if they have symptoms. Allow Q&A and dispel any myths.
- Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing
- Supply face masks and other relevant PPE to all project workers at the entrance to the project site. Any persons with signs of respiratory illness that is not accompanied by fever should be mandated to wear a face mask
- Provide hand washing facilities, hand soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks, via the use of simple signs with images in local languages

- Train all workers in respiratory hygiene, cough etiquette and hand hygiene using demonstrations and participatory methods
- Train cleaning staff in effective cleaning procedures and disposal of rubbish

3. Managing Access and Spread

- Should a case of COVID-19 be confirmed in a worker on the project site, visitors should be restricted from the site and worker groups should be isolated from each other as much as possible
- Extensive cleaning procedures with high-alcohol content cleaners should be undertaken in the area of the site where the worker was present, prior to any further work being undertaken in that area.

APPENDIX J: SIERRA LEONE BURIAL STANDARD OPERATING PROCEDURES



**REPUBLIC OF SIERRA LEONE
REPUBLIC OF SIERRA LEONE
MINISTRY OF HEALTH AND SANITATION**

**STANDARD OPERATING PROCEDURE FOR SAFE, DIGNIFIED MEDICAL BURIALS OF
COVID -19 CORPSES**

Introduction

To date there is no evidence of persons having become infected from exposure to the bodies of persons who died from COVID-19;

Only the lungs of patients with pandemic influenza, if handled improperly during an autopsy, can be infectious. Otherwise, cadavers do not transmit disease.

However Safe, dignified medical burial is an important part of the current COVID-19 outbreak control measures.

The Ministry of Health and Sanitation has developed these Standard Operating Procedures (SOPs) for safe, dignified medical burial

Purpose

The primary purpose of the Standard Operational Procedures (SOPs) is to provide operational guidance on:

1. Dignified, safe medical burial procedures,
2. Classification of deaths,
3. Engagement of families and communities,
4. Disposal of potentially contaminated materials

Scope and Responsibilities

- Scope: These SOPs apply to burial teams and all personnel involved in disposal of dead bodies.
- Responsibilities: The burial team coordinators, supervisors, and members of the burial teams shall adhere to the provisions of these SOPs when conducting burials during the COVID -19 Disease outbreak.

Objectives

1. To prevent infection
2. To provide dignified cremation of the deceased

Team composition for handling the dead body

There should be a minimum of 4 trained people (physically able) in the team comprising of:

1. The health workers attending the patient prior to demise should pack and seal the dead body.
2. Two red cross volunteers or family members to help transfer the body to the cremation site. They should use N95 face mask and gloves to prevent infection.
3. One Health Officer to support family members and oversee the infection control measures

Family members should be discouraged to handle the body sealed in a body bag. However, if they wish, they should follow a proper instruction to handle the body and use N95 mask for extra precaution. Religious representatives shall be allowed to join family members for performing rituals.

Step 1: Preparation of disinfectants

Disinfectant solutions must be prepared on the same day

1% bleaching (chlorine) solution for disinfection of body and body bags.

Step 2: List of essential equipment/materials

Body bags

1. Two impermeable and robust plastic bags that can fit maximum body size and height
 2. One cloth bag (opaque) should be able to hold 80 -120 kilos
- Materials to prevent infections.

Hand hygiene

1. Alcohol-based hand rub solution (recommended)
2. Clean running water, soap and towels (recommended)

Equipment

1. Stretcher
2. One hand sanitizer (alcohol hand-rub/spray)
3. Leak-proof and puncture resistant sharps container (sharp box)
4. Two leak-proof infectious waste bags: one for disposable material (destruction) and one for reusable materials (disinfection)

Personal Protective Equipment (PPE)

1. Disposable gloves (non-sterile)
2. Heavy duty gloves
3. Disposable coverall suit
4. Face protection: goggles/face shield
5. N95 mask
6. Footwear:
 - Gumboots
 - Shoe cover

Strategy for Safe Medical Burials procedures

- All deaths must be reported to the health authority immediately.
- Trained investigator (surveillance team) must determine the status of the deceased using the standard case definition.

- Deaths are classified as Confirmed, Probable, Suspect, or Not a case.

SOPs for Safe Burials

- All bodies will be immediately removed by the burial team to the mortuary without swabbing.
- Complete case investigation for all deaths will be carried out.
- In all instances, deaths should be registered with the birth and deaths office in accordance with the vital statistics system.

Application of Standard Case Definitions

Confirmed Case: Someone with COVID -19 positive laboratory test results that died.

- Action: Do not collect swab; conduct safe dignified medical burial immediately.

Probable Case: The death of any person who cared for someone with COVID 19.

- Action: conduct safe dignified medical burial immediately.

Application of Standard Case Definitions

Suspect Case: Any death that is unexplained OR any person who died with symptoms that meet the COVID 19 case definition (fever plus 3 or more COVID 19 symptoms).

- Action: No swabbing; conduct safe dignified medical burial immediately.
- Non-Ebola death: Any death with an obvious cause (such as a car accident, burns, or other pre-existing medical condition); no link to an COVID-19 case; and no signs or symptoms of COVID 19.
- Action: Do not collect a swab sample. In high transmission areas, conduct safe dignified medical burial immediately; in no or low transmission area, the body can be buried by the families and community.

Burial Procedure - Family Engagement

- Upon arrival at the house, the burial team supervisor should introduce him/herself and other team members.
- A community leader or counsellor should be included in the discussion with the family.
- Express condolences for the family's loss.
- Counsel the family about why special steps (safe medical burial) need to be taken.
- The burial team should be aware of the family's cultural practices and religious beliefs and help the family understand why some practices cannot be done because they place the family or others at risk for exposure.
- Family and community members can pray for the deceased while the body is being removed, from a safe distance.
- If they wish, allow the family to give any objects to be buried with the body (e.g., clothing or personal objects).
- Inform the family of exactly where the body will be taken and if they are planning on viewing the burial what time the burial team will be arriving at the cemetery.

- Inform the family that a coffin can be used if they supply one. There is no need to disinfect the body before transfer to the mortuary area;
- Body bags are not necessary, although they may be used for other reasons (e.g. excessive body fluid leakage); and
- Few mourners (not more than 10, including religious leaders) could be allowed to attend the medical burial.

Standard Operating Procedure for Safe Burials

- Mourners are required to maintain a safe distance of at least six feet from the grave site.
- Following the burial, when the grave is filled in with soil, the family could place a memorial mark at or near the grave site.
- Facility for Hand washing with soap and water should be available at the cemetery.
- No burial should occur after 1800 hrs or 6PM.

Precautions

- The burial team will have 2 vehicles, 1 vehicle is for transporting the burial team and supplies; and 2nd vehicle transports the bodies but must have a separate front cab where the burial team and driver will not be exposed to the bodies
- There is no need to disinfect the body before transfer to the mortuary area;
- Body bags are not necessary, although they may be used for other reasons (e.g. excessive body fluid leakage); and
- Appropriate PPE must be available, including face shield (preferably) or goggles, gloves and boots.
- The burial team should not touch dead bodies of suspect, probable, or confirmed COVID 19 cases without PPEs.
- All materials such as mattress, bedding including blankets and bed nets, clothes used by the deceased should be collected and burnt at a safe distance away from the house.
- The belongings of the deceased person do not need to be burned or otherwise disposed of. They should be cleaned with a detergent followed by disinfection with a solution of at least 70% ethanol or 0.1% (1000 ppm) bleach.
- Clothing and other fabric belonging to the deceased should be machine washed with warm water at 60–90°C (140–194°F) and laundry detergent.

Safe Body Preparation and Removal

1. Before touching the body, the burial team will put on full PPE (gloves, goggles or face shield, masks, suit, and rubber boots or shoe covers). Thick rubber gloves should be used for the second pair (or outer layer) of gloves.
2. Health care workers or mortuary staff preparing the body (e.g. washing the body, tidying hair, trimming nails, or shaving) should wear appropriate PPE.
3. Give the family clear instructions not to touch or kiss the body but can view it.

4. Embalming is not recommended to avoid excessive manipulation of the body.
5. Adults >60 years and immunosuppressed persons should not directly interact with the body.

Steps for removing Body

- Transport the body to the burial site as soon as possible.
- Remember that the community is watching and if the team's actions seem to be disrespectful, this will discourage the community from reporting further deaths.
- Safely remove personal protective equipment in the appropriate steps outlined by the WHO.
- The burial team supervisor should always accompany the burial team to ensure that the safety precautions remain secure during the journey.

How to transport the Body Safely

- Any member of the burial team who touch or carry the body during transport should wear the same personal protective equipment.
- Plan to take the shortest route possible for security purposes and to limit any possibility of disease transmission through accidental contact.
- Take a closed container or sprayer with strong (0.5%) chlorine (1:10 bleach) solution in the event of any accidental contact with the body or infectious body fluids. Also use it to clean up spills in the transport vehicle.

How to prepare Burial Site 1

- The grave should be at least 2.4 meters (8 feet) deep and be dug by a grave digger before the burial teams arrive with the bodies.
- All medical burials will take place in designated sites approved by local communities.
- The burial site should be 30 meters (almost 100 feet) from any water source and 500 meters from the nearest habitat.
- Burial depth should be at least 15 meters (50 feet) above ground water table.
- Before removing the bodies from the back of the vehicle, the burial team will dress in unused personal protective equipment.

How to prepare Burial Site 2

- The burial team will carefully place the body in a designated pre-dug grave, slowly lowering the coffin or body bag into the grave.
- Only 1 body will be placed in each grave.
- All of the clothes or other objects that were given by the family should be buried with the body.
- If a plaque or grave marker was provided by the family when the body was being collected, the burial team should mark the grave with this identification.

How to prepare Burial Site 3

If the family or mourners do not attend the medical burial, the burial team supervisor should inform the family of the exact location of the grave in the cemetery.

The used personal protective equipment and other medical waste should be burned in a designated area for safe burning at the cemetery every day.

How to disinfect the Vehicle after Transporting the Body

- No special transport equipment or vehicle is required for the transportation of corpse.
- Rinse the interior of the vehicle where the body was carried with strong (0.5%) chlorine (1:10 bleach solution).
- Let it soak for 10 minutes.
- Rinse well with clean water and let the vehicle air-dry. Be sure to rinse well because the solution is corrosive to the vehicle.

Check List

- Use Safe Burial Practices
- Prepare the Body Safely
- Transport the Body Safely
- Prepare Burial Site
- Disinfect the Vehicle after Transporting the Body

APPENDIX K: GRIEVANCE REGISTRATION FORM

GRIEVANCE REGISTRATION FORM (FORM A) – For Complainant

Confidentiality Required: Yes No:

Name (Complainant) Optional:.....

Contact Information (house number/ mobile phone):.....

Nature of Grievance or Complaint:.....

Details of Grievance:.....

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Name (Receiver):..... Signature:..... Date:.....

Name (Filer):..... Signature:..... Date:.....

Relationship of Filer to Complainant (if different from Complainant):
.....
.....

APPENDIX L: CHANCE FIND PROCEDURE

Project Contractors will be responsible for familiarizing themselves with the “Chance Find” Procedure presented below in case a cultural heritage resource is uncovered during excavation and other aspects of the civil works.

- i. Stop working in the zone immediately following the discovery of a material of cultural, archeological, historical, paleontological or other cultural significance;
- ii. Report ‘the Find’ to the Supervising Consultant;
- iii. The Supervising Engineer shall verify the item or resource and notify the relevant Authorities e.g. Western Area Rural District Council, Ministry of Health and Sanitation, Ministry of Tourism and Cultural Affairs and other relevant stakeholders about “the Find”;
- iv. The Contractor shall cordon off the area and provide security to prevent unauthorized entry
- v. Prevent, penalize and report any unauthorized person found within the inner perimeter of the restricted zone obtaining the cultural heritage resource; and
- vi. The Contractor shall re-start work in the area only upon approval b the Council and/or the appropriate State Agency(ies).

APPENDIX M: LAND ACQUISITION AND OWNERSHIP DOCUMENTS

26 Calmount Road,
Waterloo
Western Rural
Freetown
31st August, 2017
Tel: 078-025-868/079-127-216

The Francis John Family
89[#] Main Motor Road
Congo Town
Freetown
Tel: 076-624-444/088-624-444

The Minister of Lands Country Planning
& the Environment
3rd Floor Youyi Building
Brookfields
Freetown

Dear Madam,

**Re: AGREEMENT MADE BETWEEN THE KING FAMILY AND THE
FRANCIS JOHN FAMILY FOR THE BURIAL SITE AT WATERLOO**

As you are aware, 52.725 acres of land was surveyed and taken over by Government at the above location for burial of Ebola victims during the outbreak in 2014. This same site is being used for burial of victims following the mudslide and flooding incidents within the Freetown area on the 14th August, 2017.

While Government is using the land unhindered, the ownership of the said property became an issue of contention between the Francis John family and the King Family. This conflict exacerbated to an extent that payment for the said land was stalled. In the quest to arrive at an amicable settlement with a view to facilitating payment, a meeting between the two families was held under the watchful eyes of the Western Rural District Council (WRDC). Without prejudice to earlier discussions, the meeting resolved that, whatever Government agrees to pay for the said land is shared between the two families on a 50-50 basis (that is, the Francis John family receives 50% and the King family 50%).

As you are further aware, we the undersigned, accompanied by family members and other stakeholders including Chairman Western Rural District

Council (WRDC) held a meeting with you on 30th August, 2017 and reported the outcome of the meeting.

The purpose of this letter is to inform you that:


(a) Both the Francis John and King families have resolved that the purchase price of the land is shared between us on a 50/50 basis.


(b) That the purchase price is paid into a bank account designated by the Western Rural District Council (WRDC) for onward transmission to the two families.

We look up to Government's usual support in matters of this nature.

Yours faithfully,

 31/8/17
Alton Sammy Sawyerr

 31/08/17
Samuel Enitor King

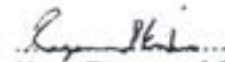
 31/08/17
Frarian E.B. Rosenior


Ola E. King


Rep: Francis John family

Rep: King family

Witnessed by:  31-8-17
Leslie O. Willenzle


Hon. Raymond Kabia

Guarantor:


Mr. Alhassan Cole
Chairman, WRDC

cc: The Attorney-General and Minister of Justice
The Minister, Ministry of Finance & Economic Development
The Minister Local Government and Rural Development
The Minister of Health and Sanitation
The Secretary to President
The Financial Secretary
The Chief of Staff
Chief Administrator, Western Rural District Council
Permanent Secretary, MLCPE
Director of Surveys and Lands, MLCPE
Director of Country Planning, MLCPE

WESTERN AREA RURAL DISTRICT COUNCIL



12/11 /2019

The Permanent Secretary
Ministry of Local Government and Rural Development
6th Floor
Youyi Building
Brookfield
Freetown.

Dear Sir,

REQUEST FOR FINAL COMPENSATION PAYMENT FOR THE EBOLA CEMETARY LAND AT WATERLOO.

You may recall sometime in the year 2017 the government of Sierra Leone through your Ministry express interest in securing a vast acreages of land in the Western Area Rural District for the burial of the Ebola Victims and Mudslide.

Sir, according to the agreement a total sum of Three Billion Leones (3,000,000,000) should be paid as compensation for the land. But as at date a total sum of Two Billion Five Hundred Million Leones (2,500,000,000) has been paid to the land Holding families and remaining a total sum of Five Hundred Million Leones (500,000,000) to be paid to the Land holding families as compensation for the Land.

Thanks for your understanding and swift action.

Yours Faithfully

Aminata P. Kargbo
(chief Administrator)

CC
Chairman-WARD-C
Finance Officer-WARDC
Lands Committee Chairman

December

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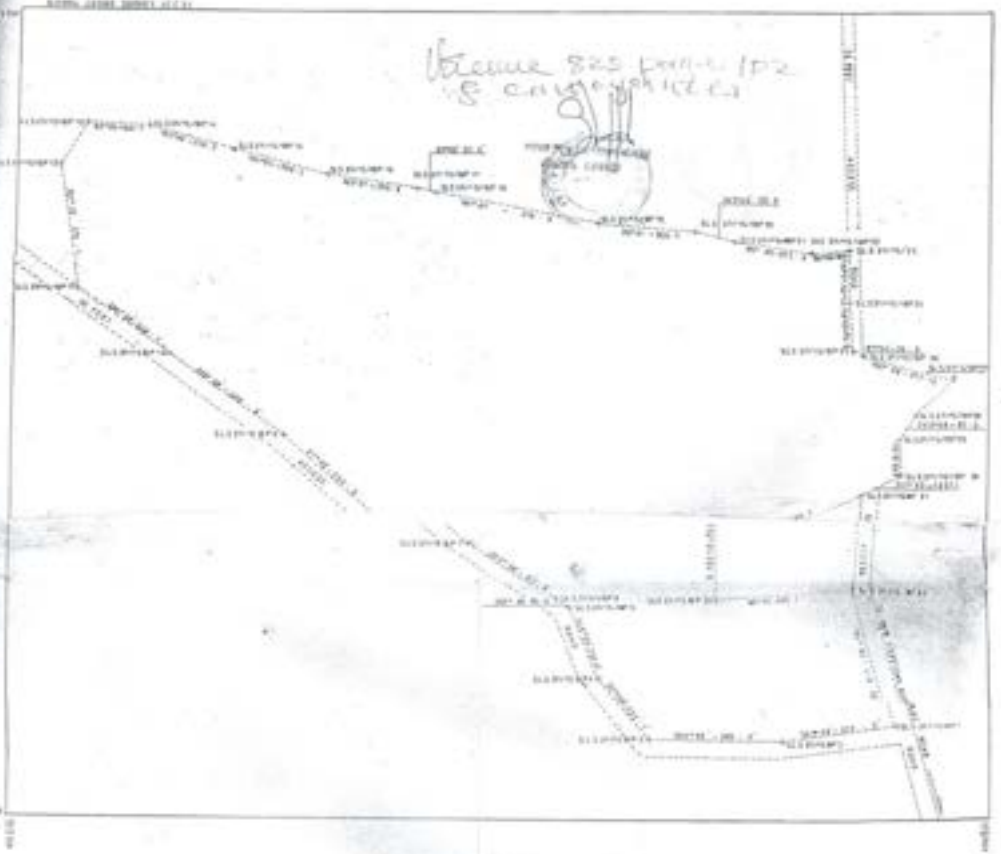
THIS CONVEYANCE is made this ^{16th} day of *January* in the year of Our Lord Two Thousand and Nineteen Between MR. SAMUEL ENITOR KING of No. 14th, Clarke Street, Tengbeh Town, Freetown AND FRARIAN EKOW ROSENIOR for and on behalf of MRS. JOSEPHINE E. THOMAS (NEE JOHN) AND LEROY SMITHE of No. 152 Off Wilkinson Road, Bangali Drive Freetown both in the Western Area of the Republic of Sierra Leone (hereinafter referred to as "THE VENDORS" which expression where the context so admits shall include their heirs, assigns successors in title) of the One Part AND THE GOVERNMENT OF THE REPUBLIC OF SIERRA LEONE Represented by the Minister of Lands Housing and the Environment, Youyi Building Brookfields, Freetown in the Western Area of the Republic of Sierra Leone (hereinafter referred to as "THE PURCHASER" which expression where the context so admits shall include his successors- in-office and assigns) of the Other Part.

WHEREAS:

1. CHARLIE THEOPHILUS KING (Deceased Intestate) late of No. 3, Young Street, Waterloo in the Western Area of the Republic of Sierra Leone died on the 22nd day of October, 2014 at Connaught Hospital, Freetown in the Western Area of the Republic of Sierra Leone and was survived by his Son and next-of-kin Mr. Samuel Enitor King (the Administrator/Vendor herein).
2. That on the 30th day of April 2015, the High Court of Sierra Leone Probate Division granted Mr. Samuel Enitor King (the Son, next-of-kin and Vendor herein) Letters of Administration in respect of the Estate of the Deceased Intestate.
3. By the said Letters of Administration aforesaid Mr. Samuel Enitor King became the Administrator to the Estate of CHARLIE THEOPHILUS KING (Deceased Intestate) to administer the Personal and Real Estate and effect which by law devolves to and vest in the Son, Next-of-kin and beneficiary.
4. Mr. Samuel Enitor King the Vendor herein as Administrator/Attorney became seised of or otherwise sufficiently entitle to the freehold and hereditaments situate lying and being at Pa Loko Road, Jorpoh Farm, Cole Town Koya Rural District in the Western Area of the Republic of Sierra Leone.

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WATERLOO
 1995 1000-10000 PLAN
 LAND ACQUIRED BY THE SEBINA LEONE GOVERNMENT FOR
 WESTERN AREA RURAL DISTRICT COUNCIL CEMETERY
 1:10000 SCALE
 1995-10-10-1000



NO.	DESCRIPTION	DATE	BY
1	ISSUED	1995-10-10	...
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 SURVEYOR GENERAL
 16 December, 2015