

EBRD COVID-19 Resilience Framework - Environmental and Social Assessment Training Programme

PR4 – Health, Safety and Security

Introduction

PR4 recognises the importance of managing health, safety, and security risks to workers, Project-affected communities and consumers associated with Project activities, through applying the hierarchy of risk control (refer to Figure 1).

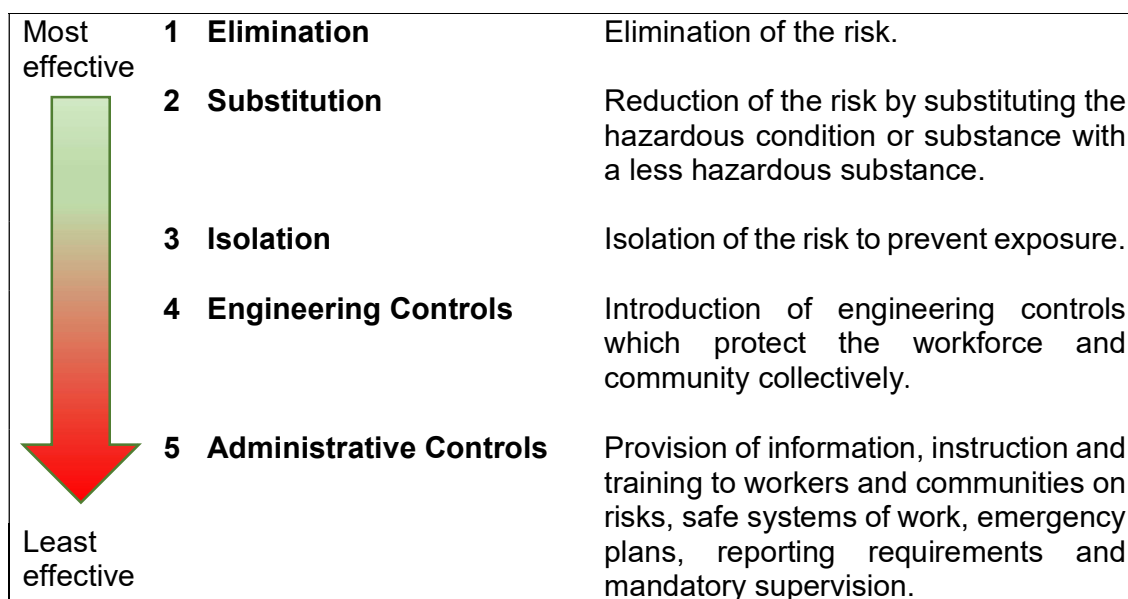


Figure 1 - Hierarchy of Risk Control

The Client has the primary responsibility to provide healthy and safe conditions for their workers and informing, instructing, training, supervising and consulting workers on health and safety (H&S). Workers have the responsibility to cooperate actively with their employer and take care of their own H&S, and the H&S of others.

PR4 requires Clients to apply a level of risk management and control that is equivalent to those specified in European Union (EU Occupational Safety and Health (OSH) standards¹ and Good International Practice (GIP) reference documentation).²

It is important to note that the overall aim of any ESDD assignment, regardless of the specific characteristics of an individual Project, is to:

- identify and assess potentially significant, existing and future, adverse

¹ For example, the OSH Framework Directive (89/391/EEC) which defines the basic obligations of employers and workers.

² For example, International Standards Organization (ISO) 39001 concerning road traffic safety management, or the International Labour Organization guidelines and standards on occupational safety and health.

environmental and social impacts associated with the Client's current operations and the Project;

- assess compliance with applicable laws and EBRD's Environmental and Social Policy (2019);
- determine the measures needed to prevent or minimise and mitigate the adverse impacts; and
- identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project and the current operations.

The ESDD process should be commensurate with, and proportional to, the scale and magnitude of the Project, and the associated environmental and social risks and impacts. The ESDD will cover, in an integrated way, all relevant direct and indirect environmental and social risks and impacts of the Client's operations, the Project and the relevant stages of the Project cycle (e.g. pre-construction, construction, operation, and decommissioning or closure and reinstatement).

The guidance on PR4 is presented across each of the three ESDD tasks:

Task 1 – Review of existing documentation

The following documents should be requested from the Client for review:

- the Client's policies and/or procedures on health, safety and security;
- environmental and social impact assessment reports, or any reports that cover assessment of health and safety risks associated with the Project and the activity of the Client;
- incident and occupational diseases statistics, preferably for at least the last 5 years;
- incident investigation procedures and reports, especially for fatalities or lost time injuries;
- risk assessment procedure and the Project's risk register;
- health, safety and security procedures applicable to the Project including:
 - OHS plan;
 - community safety plan/coordination procedures
 - transport and traffic management plan;
 - influx management plan;
 - security management plan;
 - simultaneous operations plan;
 - permit to work system;
 - working at height;
 - lifting operations and equipment;
 - confined spaces entry and rescue;
 - lone or remote working;
 - energised systems and electrical safety (e.g. lock out, tag out);
 - hazardous materials storage;
 - management of change procedure;
 - health screening;
 - emergency preparedness and response plan;
 - incident reporting and investigation;

- H&S audit reports and the Project's non-conformance log; and
- a copy of the induction training package and briefing provided to workers.

For Projects which represent a potential major accident or hazard risk the following additional documentation should be requested:

- basis of design;
- health and safety philosophy;
- process safety studies or hazard analysis (hazard identification workshops reports (HAZIDs), hazard and operability study reports (HAZOPs), Quantitative Risk Assessments (QRAs); and
- hazardous area classification drawings.

PR4 Requirement	Issues to consider
<i>General Requirements for Health and Safety Management</i>	
The Client must have a process to identify and assess risk and prevent accidents and ill-health to workers, the public. Where there are specific risks associated with certain work activities that could result in adverse effects on the health, safety and well-being of workers with sensitivities such as age, gender, disability or short or long-term health conditions, the Client will carry out more detailed risk assessment and make adjustments to prevent injury and ill-health. Guided by risk assessment, the Client shall develop plans and protection measures that reflect Good International Practice and the hierarchy of risk control.	Is there a documented process for the identification and assessment of risks to employees, Project workforce and communities? Is a Project risk register available? If yes, then: • Is it comprehensive and does it include risks from both onsite and off-site activities, including risks to communities? <i>NOTE: these may arise from the transport of materials, associated facilities, pipeline connections, etc.</i> • Does it consider risks associated with: ○ contractors, visitors, Project security personnel, or interaction with government security services; ○ work activities that could impact the health of workers with pre-existing sensitivities; ○ natural hazards; ○ industrial action and protests; ○ non-routine and emergency conditions; ○ risks associated with transitioning from one phase of the Project to another (i.e. pre-commissioning into the start of operations)? • Has the risk register been recently updated? • Has the hierarchy of risk control been applied? • Has the Client prepared a set of plans and procedures to respond to the range of risks identified, including community health and safety plans? • Does the Client require all workers to be screened for pre-existing medical conditions?

PR4 Requirement	Issues to consider
The Client will assess Project-related gender-based violence risks of sexual harassment, sexual exploitation and abuse to Project-affected persons and communities.	Has the Client assessed this type of risk to occur and implemented any measures? Are the measures implemented culturally appropriate?
The Client will develop a Project-specific safety and health plan, integrated into the ESMS where appropriate and subject to periodic review to evaluate its effectiveness.	Has a Project-specific safety and health plan been developed? Is the safety and health plan clear, easily understood, defines controls, responsibilities, competencies, monitoring measures and records that are to be generated? Has the safety and health plan been reviewed externally? Has the safety and health plan been updated recently to reflect any changes to the Project?
The Plan must identify risk and protection measures appropriate to the stage, size and nature of the Project in accordance with relevant EU Occupational Safety and Health (OSH) standards and Good International Practice (GIP), where appropriate.	Does the safety and health plan reference any specific EU directives, guidelines or standards (e.g. 89/656/EEC: use of personal protective equipment (PPE), 99/92/EC: risks from explosive atmospheres) or suitable GIP standards e.g. those of ISO, ILO etc.? If no specific references are stated, are the measures adopted aligned with GIP? <i>NOTE: check the proposed measures against suitable ISO, ILO or EU Standards.</i>
The Client will identify a person responsible for OSH who will assist with implementation of the Plan.	Has the Client appointed personnel who have clearly defined OHS responsibilities in line with relevant national requirements or specific industry requirements/GIP? Do they have required qualifications and training that fit the nature and magnitude of Project activities? Are there enough resources to cover all Project sites and the activities of the Client?

PR4 Requirement	Issues to consider
The Plan will be applicable to the Client's non-employee workers, contractors and other third parties engaged in Project work. The Client will ensure that all workers are provided with continued and appropriate supervision to ensure safe use of work equipment and adequate implementation and enforcement of the safety and health procedures and rules.	Are the requirements of the safety and health plan extended to contractors within the Project's supply chain? What steps does the Client take to check, supervise and inspect the safety and health performance of the contractors within the Project's supply chain? <i>NOTE: supervision and inspection measures may be specified in a separate document such as a contractor management plan. The OHS plan should include a reference to the relevant document.</i> What steps does the Client take to ensure workers are adequately supervised?
The Client will provide personal protective equipment at no cost to the workers.	Is a regular process undertaken to identify the PPE needs of the workforce? Is PPE provided to workers free of charge? Is provided PPE adequate for the conditions of work (e.g. extreme temperature conditions, exposure to specific hazards, etc.)? Is PPE used in good condition, a correct size and replaced regularly as required? How does the company monitor and enforce the use of PPE?
The Client will consult workers on OHS matters and monitor the health of workers.	How does the Client consult workers on safety and health matters? <i>NOTE: request copies of recent meeting minutes and other types of evidence the Client can provide to demonstrate that consultation with workers on safety and health matters is regularly taking place.</i>

PR4 Requirement	Issues to consider
Workers and Project affected communities should be supplied with relevant information, instruction and training relating to health and safety hazards, risks, protective and preventive measures and emergency arrangements that are necessary for their health and safety throughout the Project.	Have affected communities been provided with timely, clear and accessible information associated with the key H&S risks associated with the Project? Has the Client informed local communities about how to respond in an emergency, and who they should contact if they have a concern? Are workers being provided with information, instruction or training on: • key H&S hazards, risks and general and individual control measures; • required safety and health monitoring (air quality, dust, temperature, vibration, radiation, etc.); • required permits and authorisations to undertake certain types of work and the competency requirements for activities such as confined space entry, machinery operation, and others; • emergency response measures; • how to report unsafe acts and unsafe conditions; • accident reporting procedures; • their right to stop work if they feel an activity or task is unsafe? • first aiders in their work area;
The Client will investigate any accident, injury, ill-health or any significant³ 'near-miss' that results during the Project. The results of the investigation shall be analysed to adopt measures to prevent reoccurrence and, where required by law, notify and cooperate with the relevant authorities. The Client will ensure appropriate financial compensation for any persons suffering injury or ill-health that is caused by Project activities.	Is there an incident investigation procedure? Does the procedure include details of notification and ongoing consultation with the safety and health regulator? Does the procedure require the Client to identify the root causes of incidents? Does the procedure require the inclusion of investigators who are independent of the Client? Are investigation reports detailed, consider appropriate contributing factors, and include information provided by those involved? Have the report's recommended actions been implemented?

³ Significant is considered to mean a 'near-miss' that could have resulted in a fatality, someone receiving hospital treatment or having to take time off work.

PR4 Requirement	Issues to consider
<i>Specific Requirements for Infrastructure, Building, and Equipment Design and Safety</i>	
The Client will incorporate health and safety considerations into all phases of development for the structural elements/components of the Project in accordance with GIP. This extends to ensuring access for all (including people with an impairment or disability) to communal spaces.	What national and international standards have been used to incorporate H&S considerations into the design? Has the design of structural elements of the Project been reviewed and inspected by competent and qualified professionals? <i>NOTE: qualified architects, engineers and contractors without experience of high-rise construction may not necessarily be competent to work on high-rise development.</i>
Third-party life and fire safety audits will be undertaken for all new public buildings and their major refurbishment, prior to their commissioning or use.	Have new build or major refurbished public buildings been subject to an independent fire safety audit?
When structural elements or components, such as dams, tailings dams or ash ponds, are situated in high risk locations and their failure or malfunction may threaten the health and safety of workers and communities, the Client will engage one or more qualified experts with relevant and recognised experience in similar Projects, separate from those responsible for the design and construction.	Does the Project contain structural elements? If yes, has the Client appointed independent review by a competent and qualified expert with experience of similar structural elements to verify the safety and structural integrity? Has the assessment been repeated through all stages where design changes may have occurred? For buildings with communal areas, has access for all people, including those with a disability, been considered and provided or alternative methods offered?

PR4 Requirement	Issues to consider
<i>Specific Requirements for Hazardous Materials Safety</i>	
The Client will prevent or reduce worker and community exposure to hazardous materials (including hazardous waste) by adopting the hierarchy of risk control. The Client will apply the hierarchy by, in order of preference: 1. eliminating – removing the use of the material 2. substituting – using a less hazardous material 3. isolating - removing access or preventing proximity to the hazardous material.	Has the Client identified the potential use, presence and risks of hazardous materials? If yes, then has the Client: • identified required volumes and storage requirements for hazardous materials; • adopted the hierarchy of risk control; • identified the location of the material, that is safe and appropriate, and noted it on drawings or a register; • restricted access to the material; • provided appropriate safety signs including mandatory PPE requirements, hazards and emergency actions; • provided eye wash or safety showers in immediate area or other appropriate safety measures; • appropriately labelled and segregated materials in clearly marked storage facility; • provided adequate secondary containment; • implemented a permit to work system; • informed workers of the risks and control measures required; • Provided Material Safety Data Sheets in the local language or languages of the employed workforce (in case of presence of foreign and migrant labour); and • Assessed and implemented health surveillance requirements.
Where use of such materials cannot be avoided, the Client will take the necessary measures for safe handling, storage, transport and disposal in accordance with GIP including the implementation of measures to avoid or reduce Project-affected community exposure.	Has the Client adequately assessed the risks of hazardous materials posed by its storage, handling, transportation and disposal? Is there a process of monitoring to check that the controls have been implemented and effective? <i>NOTE: this could include regular inspections of storage areas and checking there is a register of the types and quantities of all hazardous materials on site.</i>

PR4 Requirement	Issues to consider
<i>Specific Requirements for Product Safety</i>	
Where products are manufactured or traded, the Client will ensure product safety through good design and manufacturing processes, as well as adequate storage, handling and transportation for the product distribution.	Is this relevant to the Project? If yes, has the Client identified and evaluated risks to consumers associated with its products throughout their lifecycle?
GIP will be followed, including general safety requirements specific to the product safety standards and codes of practice in a given business sector and country.	Does the Client have documented policies and procedures for communicating with consumers and effective processes for product withdrawal/ recall, where a product is unexpectedly found to be potentially hazardous to health?
	Has there been any such product withdrawal/ recall in the past and how was this managed?
<i>Specific Requirements for Health and Safety Risks in Community Services</i>	
Where the Project involves provision of services to communities, the Client will ensure the safety and quality of such services and implement appropriate quality management systems to make sure that such services do not pose risks to workers or community health and safety.	For Projects providing services to communities:
Where the Project involves the provision of public services, to the extent possible, the Client will incorporate the principles of universal access (access to disabled people).	• Has the Client implemented a quality management system? • Has the system been externally audited and certified? Has the Client incorporated universal access into the Project's design? <i>NOTE: ask the Client if any consultation has taken place with suitable organisations in relation to the provision of disabled access.</i>

PR4 Requirement	Issues to consider
<i>Specific Requirements for Traffic and Road Safety</i>	
The Client will identify, assess and monitor road safety risks to workers and communities throughout the Project life-cycle and, where appropriate, will develop measures and plans to address them. For Projects that operate moving equipment on public roads and other forms of infrastructure, the Client will seek to prevent the occurrence of incidents and injuries to members of the public. The Client will take into consideration relevant EU road and traffic safety management standards, identify road safety measures and incorporate road safety components into the Project design to mitigate potential road safety impacts on communities.	Have the risks associated with Project's transporting workers and materials on roads been assessed? <i>NOTE: this may include dangerous driving conditions, use of remote roads, poor road quality, lack of communication facilities along the road, long journeys, road accidents involving injuries to workers and other road users, spillage of hazardous materials, etc.</i> Does the assessment consider risks to communities and other sensitivities along transport routes? <i>NOTE: this may include Project vehicles driving through busy residential areas, school crossings, railway crossings, deterioration of communal roads due to transportation of heavy equipment and materials, etc.</i> Does the Project require a traffic management plan and has one been developed? Are roads and pedestrians within the site kept apart as much as possible? Does the risk assessment include details of driver's regular breaks and overnight stops along the transport route? How are traffic and transport movements being monitored? Does the Project involve the transport of dangerous goods? If yes, has the Project implemented suitable risk control measures? <i>NOTE: this may include EU Industry Guidelines on the Transport of Dangerous Goods.</i>⁴ Does the Project involve the construction or alteration of public roads including construction of significant junctions or site entrance / exits onto public roads? If yes, has the Project undertake a road safety audit or inspection in line with EU Road and Traffic Safety Management Standards, or other suitable EU National guidelines?⁵

⁴ EU Industry Guidelines on the Transport of Dangerous Goods, Available at:

https://ec.europa.eu/transport/road_safety/topics/dangerous_goods_en

⁵ EU National Road Safety Guidelines by country, Available at: https://ec.europa.eu/transport/road_safety/topics/dangerous_goods_en

https://ec.europa.eu/transport/road_safety/topics/infrastructure/national-guidelines_en

PR4 Requirement	Issues to consider
For Clients with vehicles or fleets of vehicles (owned or leased), the Client will introduce GIP arrangements to manage road and traffic risks and will provide training to workers on driver and vehicle safety. The Client will ensure regular maintenance of all Project vehicles.	Does the Client have: • a documented risk control measure based on a suitable standard, such as ISO 39001:2012 or the UN Road Safety Strategy;⁶ • a driver training system that also applies to sub-contractor workers; and • a system of undertaking regular vehicle maintenance in accordance with the manufacturer's specifications; and • any systems that monitor the location of Project vehicles and their adherence to approved journey plans; speed limits; use of fuel; timely and sufficient rest breaks for drivers, etc. Is there an adequate procedure in place for regular inspection and maintenance of Project vehicles? <i>Note: for Projects involving a fleet of more than 50 vehicles, a detailed Road and Traffic Safety Questionnaire (refer to the links to additional guidance in this document) needs to be completed by the Client.</i> Are mechanics competent and qualified to work on the type of vehicles being maintained? <i>NOTE: a car mechanic may not be competent to inspect and maintain certain safety critical systems on other vehicles, such as the hydraulic brake systems on a large truck.</i>
Specific Requirements for Natural Hazards	
The Client will identify and assess the potential risks caused by natural hazards, such as earthquakes, droughts, landslides or floods as these relate to the Project. The Client will avoid and/or minimize risks caused by natural hazards or land use changes to which the Project's activities may contribute.	Has the Client assessed Project risks associated with all potential natural hazards including the Project's location, existing geological and hydrological information, climactic conditions and historical fluctuations, and records of natural disasters? Is the Project located in an area that could be vulnerable to climate change? If yes, has the Client assessed climate change risks, and identified suitable climate resilience and adaptation measures?

⁶ United Nations (2018), Road Safety Strategy, Available at: <https://www.who.int/roadsafety/publications/UN-RoadSafetyStrategy-EN.pdf?ua=1>

PR4 Requirement	Issues to consider
<i>Specific Requirements for Exposure to Disease</i>	
The Client will develop mitigation in consultation with the relevant authorities to minimise worker and community exposure to disease. The approach must consider vulnerable groups who may be at higher risk from disease and adapt measures to reflect the increased risk.	Could workers and communities be exposed to potential diseases associated with the Project? <i>NOTE: these may involve diseases associated with working in remote locations and presence of disease-carrying animals and/or venomous insects and reptiles, poor sanitary conditions on site, poor accommodation conditions, lack of clean water, etc.)</i> Has the Client developed a plan to prevent and minimise worker's and communities exposure to disease? If yes, has the Client consulted with relevant authorities and included their recommendations? Does the plan include specific measures for vulnerable groups? <i>NOTE: refer to the definition of vulnerability used in PR1.</i>
The Client will take measures to avoid or minimise transmission of communicable diseases that may be associated with the influx of Project workers. This includes measures to prevent gender-based risks that may be associated with the influx of labour.	Is the Project likely cause an influx of people into the area looking for work? If yes, have measures been implemented to prevent the spread of any disease? <i>NOTE: this may include medical screening prior to their arrival at the Project site, regular health checks; regular prophylaxis and vaccinations, regular disinfection of commonly used areas, awareness raising campaigns, etc.</i> Do these measures include specific controls to prevent gender-based risks occurring, including those related to sex workers and prostitution?
Where specific diseases are endemic in Project-affected communities, the Client is encouraged to identify opportunities throughout the Project life-cycle to improve conditions that could help reduce their incidence, both among the workers and Project-affected communities.	Is the Project being undertaken in an area where specific diseases are common? <i>NOTE: this could include malaria or HIV/AIDS.</i> If yes, has the Client considered how it can help workers and communities improve the current health situation? <i>NOTE: this may include raising awareness, providing screening and treatment programmes.</i>

PR4 Requirement	Issues to consider
Specific Requirements for Emergency Preparedness and Response	
The Client will be prepared to prevent and respond to incidents, accidents and emergency situations likely to occur as a result of Project activity.	What are the potential emergency situations that may occur? <i>NOTE: this may include climatic conditions, failure of storage tanks or pipes, political unrest, etc.</i>
	Has the Client developed an Emergency Response Plan (ERP) for all these events? Does the ERP include details of applicable national regulatory requirements?
The Client will identify and assess major accident hazards, and will take all measures necessary to prevent major accidents or limit their risks on workers, communities and the environment, with a view to ensuring high levels of protection to people and the environment in a consistent and effective manner. Such measures will be identified in a major-accident prevention/emergency preparedness policy and an appropriate management plan, integrated into the Client's overall ESMS.	Does the Project involve the significant use, transport, storage, production or disposal of hazardous substances? <i>NOTE: these may include substances that are toxic, flammable or ionising.</i>
	If yes, has a major accident hazard assessment been completed and appropriate prevent policies and plans been implemented? <i>NOTE: EU Directive 96/82/EC includes in Annex 1⁷, the criteria for facilities considered a source of major accident hazards (e.g. >10 tonnes ammonium nitrate, >10 tonnes of flammable gas) etc. If the Project meets one, or more, of these criteria then a major accident hazard assessment is required.</i>
	Have Project risks been assessed using a suitable methodology such as a HAZID, HAZOP, QRA, etc.?
	Has the assessment been conducted by individuals with a mixture of skills and competencies?
	Does the assessment consider escalation scenarios and risks from nearby facilities and industries?
	Does the assessment and ERP consider major hazards to the environment?
	Has the assessment and ERP included lessons learned from other global major accidents?
	Has the assessment and ERP been reviewed or

⁷ EU Directive 96/82/EC including Annex1, Available at <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex:31996L0082>

	approved by national authorities? Has the assessment and ERP been reviewed and updated to reflect changes to the Project?
PR4 Requirement	Issues to consider
Where a major-accident risk is present, the Client will assist and cooperate with the relevant authorities and the community in their preparations to respond effectively to emergency situations. If local authorities or responders have little or no capacity to respond effectively, the Client will play an active role in preparing for and responding to emergencies associated with the Project, and will provide adequate evidence to demonstrate capacity to respond to reasonably predictable incidents, either directly or indirectly.	Does the ERP describe the resources that are available to respond to an emergency? Has the Client communicated with relevant authorities (such as government departments, regional fire and police authorities) and included details of their involvement and communication protocols in the ERP? If local authorities do not have sufficient resources to respond to an emergency, then does the Client have the resources available? Has the Client provided information on the actions to be taken in the event of an emergency and consulted with communities regarding the type of major accidents that may occur? Has the process of consultation encouraged community feedback? How has the Client modified their response arrangements using this feedback?
<i>Specific Requirements for Security</i>	
The Client will assess Project security threats to workers and communities. When the Client retains employees or contractors to provide security, it will assess risks posed by these security arrangements to those within and outside the Project site.	Has the Client conducted a risk assessment of security threats to the business operations that may affect workers and communities (e.g. terrorist acts, etc.)? Has an assessment been carried out to assess the risks posed by the inappropriate behaviour of security personnel to affected communities? Are there clear rules of engagement that describe actions to be taken by security personnel in certain situations? <i>NOTE: this could include dealing with large crowds of protestors, worker strikes, unauthorised entry and intrusions, etc.?</i>
If security services are the responsibility of the relevant governmental authorities, the Client will collaborate, to the extent permitted, with the responsible government	Are security services armed? If yes, is this justified and legal under national legislation? Does the Project involve the use of security forces provided by the government?

authority to achieve outcomes that are consistent with this PR.	If yes, what steps has the Client taken to achieve the outcomes consistent with PR4?
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PR4 Requirement	Issues to consider
The Client will (i) make reasonable inquiries to verify that the employees or contracted workers retained by the Client to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and Project-affected communities; and (iii) require them to act within the applicable law and any requirements set out in PR2 and any other PRs as specified by the Client.	Has the Client ensured that security personnel are effectively screened, trained?
The Client will investigate any allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and where necessary report unlawful and abusive acts to public authorities and to the EBRD.	Has the Client committed to investigate any allegations made against security personnel?

A list of queries should be compiled following the review of all documentation received during Task 1, including any gaps in the material provided. Use the 'Task 1 Key Findings' format presented in Module 1 of this training programme.

Task 2 – Site visit and discussions

The site visit and discussions should be used as an opportunity to observe the acts of workers, check procedures are followed, confirm how safe operations are being implemented and discuss the list of queries compiled during Task 1. Take notes on the quality of the induction process you should be asked to complete, as soon as you arrive at the site. The induction should cover the nature of activities conducted at site and present details of hazards present, indicate the actions to be taken and ones to avoid, details of the alarm system and tests that may take place during your time on site, and where to move to in the event of an emergency. During Task 2, you may need to meet with the following (these meetings should be organised in advance):

- **Project Director** – for a brief introduction associated with the purpose and scope of your visit, and to discuss the Client's approach to the management of key H&S risks. You can also use this session to request the availability of other Client representatives that you need to meet, and to thank them for their general support.
- **Health and Safety Manager/Chief or Technical Engineer** – to discuss the technical aspects and approaches to H&S including organisational responsibilities, the key hazards on site and actual control measures implemented onsite, the Project's risk register, activities undertaken by contractors and relevant monitoring activities. This meeting should include a

site tour and be used to check the manager's understanding of health and safety, the types of hazards present, risk control measures, and what constitutes 'GIP' and their general experience in applying GIP to similar Projects.

- **Contractor Health and Safety Manager or Site Manager** - to explore how the contractors present are assessing and managing risks and coordinating their activities with other personnel present on site; what are the contractors' emergency plans and procedures for specific sites; and to understand how the Project monitors contractor's health and safety performance, and the type of support they are providing to contractors.
- **Health, Safety and Environment (HSE) Inspectors or Site Supervisor** - to check the competency of individuals undertaking routine inspections, to assess their understanding of GIP, to check they have the level of support and resources required, and to explore their own understanding of the key H&S risks.
- **Emergency Response Team** - to check there is clear understanding of emergency response arrangements, responsibilities and communication, and that they have the necessary level of resources.
- **Competent Persons and Workers** – who are qualified to undertake or control specific high-risk activities such as electricians, riggers/slingers, and drivers of heavy goods vehicles, to discuss their training and awareness of risks.
- **Interview with Workers** – to discuss their understanding of risks, their individual H&S responsibilities and training they have received.
- **Project Security Manager** – to inquire about Project security threats and relevant arrangements adopted by the Project/the Client (e.g. security fences; CCTV; intrusion and movement detection systems; armed security personnel; rules of engagement, etc.), identify and discuss recent security incidents, and also to understand how security personnel have been screened and provided with training.

NOTE: the questions in this section may need to be modified to reflect the current status of the Project.

Interview with the Health and Safety Manager/Chief or Technical Engineer

The Health and Safety Manager/Chief or Technical Engineer should be interviewed, to clarify the list of queries generated during Task 1. During this meeting, the following questions could be asked:

1. Please provide an outline your organisations' approach to health and safety?
2. Is the Project's health and safety performance improving and how is this being communicated to the Project's senior management team?
3. How has the Project's senior management team encouraged a culture of health and safety? *NOTE: this may be from completing senior management walkovers, attending H&S meetings, H&S leadership initiatives and communications or rewarding good H&S practice.*
4. What standards and guidelines have informed the design and approach to health and safety?
5. Do you have dedicated health facilities available to workers at each Project site? *NOTE: request to see these facilities and check the register of those who have recently attended.*

6. How has the requirement for these resources been defined?
7. Do you require any additional resources in the future as the Project proceeds into the next stage (i.e. from construction into operations)?
8. How are individual health and safety responsibilities to personnel defined?
9. What actions are you undertaking to monitor the effectiveness of the controls measures to prevent worker exposure to workplace hazards? *NOTE: this include monitoring for air quality, dust, temperature, vibration, radiation, etc.*
10. Do all personnel involved in the Project have a valid medical fitness to work certificate and what are the requirements/procedures for medical fitness tests?
11. How do you encourage personnel to stop other people's work if they observe a situation that is not safe?
12. How do personnel record and report unsafe acts or unsafe conditions at work?
13. How is the health and safety performance of your contractors being monitored and managed? *NOTE: this discussion should cover how health and safety issues are taken into consideration during contractor selection, induction before any construction works are undertaken, during the works until their demobilisation.*
14. How do you consider/reference check a contractors' health and safety performance before appointing?
15. What support are you providing to your contractors?
16. What happens if a contractor's health and safety performance is below the required standard or you have observed concerns with their workforce?
17. Will individual contractor's health and safety performance at the end of their contract be reported back to them to build their capacity?

Interview with the Contractor Health and Safety Manager or Site manager

If possible, a Contractor Health and Safety Manager or Site Manager should be interviewed, without the Client present, to explore the level of support and direction provided by the Client. During this meeting, the following questions could be asked:

1. Please describe your company's role in the Project, and your organisations' health and safety responsibilities? *NOTE: check they clearly understand what their responsibility is and what is the Client's. Does this match what is contained in the Client's documents?*
2. How are health and safety arrangements coordinated with the Client and other contractors? *NOTE: ask if there are regular meetings, defined methods of communication, combined inspections?*
3. In your view, do you have enough resources to manage health and safety risks effectively at all Project sites and locations?
4. Does your own senior management provide you with sufficient support?
5. How does the Client provide support to your organisation?
6. Have you checked that your own organisations' personnel all have valid medical fitness to work certificate and appropriate training to undertake work safely?
7. Are there are any health and safety issues you would like to discuss?

Interview with a Health and Safety Inspector/Site Supervisor

If the Project uses Health and Safety Inspectors or a Site Supervisor then one, or more, should be interviewed to clarify any applicable queries generated during Task

1. During this meeting, the following questions could be asked:
 1. Please provide a summary of your previous professional experience and your responsibilities for this Project?
 2. How many people are there completing similar work to yourself?
 3. What areas or facilities are being regularly inspected?
 4. How were these locations defined?
 5. Are any facilities of suppliers also inspected?
 6. What training have you received for this specific Project?
 7. Does the inspection team have sufficient skills and experience?
 8. Do you have enough inspectors and resources? *NOTE: resources may include gas meters, noise monitoring equipment, CCTV, etc.*
 9. Can you describe/confirm the action you take if you observe any worker or contractor undertaking a task which is unsafe, or in results in an unsafe condition?
 10. What inspection records are being generated? *NOTE: review a sample of the inspection records to check they are sufficiently detailed and comprehensive.*
 11. How are your findings or recommendations being tracked to ensure they are being implemented?

Interview with the Emergency Response Team

A variety of personnel may be part of the Project's Emergency Response Team. If possible, interview a representative who is part of the Emergency Response Team and ask the following questions:

1. What emergency situations are you prepared for and what training has been provided to you?
2. Please provide a summary of the approach used to prepare the ERP, scenarios considered, and an overview of the resources you have available?
3. How have you defined the level of resources required to respond to an emergency?
4. How has the split in emergency response responsibilities between different organisations been defined? *NOTE: the Client should have identified how responsibilities for emergency response are divided amongst the Client, workers, suppliers, government departments, and potentially private companies available to provide specific types of emergency response resources. Compare the answers given to the content of the ERP.*
5. What training activities have you conducted to ensure that people are aware of what actions to take and their emergency response responsibilities?
6. What checks have you completed to ensure that third-party organisations (including government departments) have the resources available to respond in an emergency and what coordination have you had with these agencies?
7. What emergency response drills have been undertaken?
8. Are drill scenarios modified to reflect the different scenarios that could occur?
9. What will happen if an emergency arises that the Project cannot respond to, due to the scale and magnitude of the incident?
10. How are emergencies identified and responded to, outside of normal hours of work?
11. Are there any facilities or industries located close to Project facilities and infrastructure that could be affected by an emergency? If yes, have they been contacted and taken into consideration during preparation of the ERP and

training activities?

Interview with Competent Persons and Workers

The following questions could be asked

1. What are the required skills, qualifications and experience for your role?
2. Has the Client provided any training? If yes, how was the training provided, what did it cover, and did you have to pay for it?
3. Did you receive a formal certificate for the training you received?
4. What are the main hazards associated with your job, and what controls are in place to prevent an incident?
5. How are non-competent persons prevented from undertaking the activities that you are authorised to complete?

Interview with Workers

Ideally interviews with workers should be conducted without any Client or contractor management being present. *NOTE: refer to the PR2 guidance for additional questions to be asked during worker interviews.*

1. Please provide a summary of your role and activities?
2. Are you aware about hazards and risks associated with the Project and with your specific tasks?
3. What are your H&S responsibilities?
4. Did you receive a health and safety induction prior to starting work on this Project?
5. Have you received any training since your induction?
6. Was the training provided easy for all workers to understand?
7. How could it be improved?
8. Do you have adequate PPE that fits your size, your health status (such as vision and hearing aids) and the general conditions of work?
9. Is the PPE being provided good quality?
10. Is the PPE free of charge?
11. Is it easy to get replacement PPE if it becomes damaged or unusable?
12. Are you comfortable to work in your current environment in relation to the temperature, rain/snow, excessive heat, etc.?
13. Would you feel able to stop other people's work if you observed a situation that was not safe?
14. Do you know how to record and report unsafe acts at work?
15. Do you have a valid medical fitness to work certificate?
16. Do you have access to occupational health and safety advice?
17. Do you know what to do in the event of a fire, or spillage of hazardous material?
18. Are there any other health and safety issues you would like to discuss?

Interview with the Project Security Manager

The person responsible for maintaining security at Project facilities and infrastructure should be interviewed. During this meeting, the following questions could be asked:

1. Please provide an overview of the Project's current security risks, threats and arrangements? *NOTE: this should include details of private companies involved, the responsibilities (if any) of government departments, and the*

equipment such as firearms and CCTV being used.

2. Are you aware of EBRD's specific requirements associated with security?
3. Have you had any security incidents? If yes, please provide details.
4. How have you checked that security personnel have not been involved in a past abuses?
5. What training on the rules of force and the rules of engagement have you provided?
6. Have you had any complaints raised by local people associated with the behaviour of security personnel?

Site Visit

During the site visit a range of areas should be inspected, including construction works, warehouses and Project storage areas, locations where hazardous materials are stored, worker accommodation facilities (including those used by sub-contractor organisations) and health clinics. The site visit should in particular target areas and activities that may potentially result in injuries and fatalities (e.g. areas at height; excavation and trenches; lifting operations and equipment; confined spaces; electrical and mechanical equipment; machinery and moving parts and objects; traffic areas, etc.).

The site visit should be used to check that the actual approach to manage risks reflects what the Client has committed to in the Project documentation. The site visit should also be used to check all hazards and risks have been identified and that the control measures and H&S performance are aligned with GIP.

Digital photos should be taken of good, and bad practice, to present a balanced view on the Project's current H&S status. The site visit is also an excellent opportunity to provide informal training to the Client's team and point out any concerns that you identify and indicate the actions required, as you proceed through the different locations.

NOTE: Before leaving complete the checklist overleaf to ensure that the EBRD's key requirements under PR4 have been covered

Task 3 – Analysis and reporting using the EBRD format

The findings of Task 1 and 2 need to be analysed and presented using EBRD's Reporting Framework presented in Module 3 of this training programme.

During the analysis of the data collected consider the following:

- Has the Client demonstrated that they have actively applied the hierarchy of risk control, prioritising elimination of risk and only resorting to PPE use to protect the worker as a measure of last resort?
- Are senior management actively leading the safety culture of the Project?
- Has the Client made adequate efforts to identify and assess Project hazards and risks?
- Did the assessment consider worker sensitivities and the environmental setting

of the site?

- Based upon a review of recent records and your site observations, are there specific areas where H&S management should be improved? *NOTE: this could include general housekeeping to prevent slips and trips, management of heavy goods vehicles, preventing workers from being exposed to hazardous substances, welding activities, record keeping, etc.*
- Are the Project's inspectors missing issues that you have identified as a problem? If yes, could this be due to their lack of experience and understanding of how GIP should be applied? Should any additional training be provided to the inspectors?
- Is the Client effectively monitoring the health and safety performance of their contractors?
- Is the Client actively supporting and helping them to improve?
- If the Project represents a major accident hazard, was the risk assessment sufficiently detailed using a qualitative method?
- Have they assessed a suitable range of emergency scenarios, including the potential for escalation to occur?
- Are the emergency response arrangements sufficient?
- Are emergency response responsibilities clearly defined, covering communication, response and other activities?
- Do you feel that emergency resources are sufficient?
- Are emergency resources available at the site sufficient to protect the safety of local communities?

Additional guidance, tools and reference documents

Additional EBRD guidance on the implementation of PR4 is provided here:

- Road Safety Toolkit: <https://www.roadrisktoolkit.com>
- Traffic and Road Safety Questionnaire (refer to Appendix A)
- Road Safety Audit (refer to Appendix B)

EBRD COVID-19 Resilience Framework - Local Environmental and Social Due Diligence Skills Capacity Building

PR4 – Health, Safety and Security

Please confirm all of the actions have been completed		Yes / No
<i>Leadership and organisation</i>		
4.1	The commitment of the Client's senior management team to health, safety and security has been discussed with the Client. Examples of how they are actively involved have been recorded.	
4.2	Responsibilities for health and safety for the Project, and the actions to be taken in an emergency, have been discussed.	
<i>Applicable standards, obligations and GIP</i>		
4.3	The Client has been asked what health, safety and security compliance standards are being applied, and how compliance is being monitored.	
<i>Existing documentation relevant to health, safety and security</i>		
4.4	Key documents describing the way in which health, safety and security is being managed have been reviewed.	
<i>Applying the hierarchy of risk control</i>		
4.5	The Client has been asked to demonstrate how the hierarchy of risk control has been applied, including examples of how hazards have been eliminated, substituted or isolated with administrative controls and protecting the worker with PPE being the final option.	
<i>Training, awareness, competence and resources</i>		
4.6	The approach to delivering induction and on-going training to workers has been discussed.	
4.7	The Client has been asked how they have increased the awareness of health and safety risks associated with the Project to workers, and affected communities.	
4.8	The adequacy of existing health, safety and security resources has been discussed with the Client.	

<i>Managing risk</i>		
4.9	The Client's approach to managing contractors has been checked, including: • how contractors are selected and whether H&S and security performance is considered prior to their selection; • how contractors are monitored and supervised; • what training and support will be provided to contractors to build their capacity if their performance needs to be improved; • what action the Project will take if contractor performance is not meeting requirements; • how contractor performance will be evaluated at the end of their contract and how this will be reported back to the contractor to build their capacity.	
4.10	The site visit has been completed and the application of the Project's health, safety and security procedures and plans has been checked.	
4.11	Emergency response measures have been discussed and the scenarios identified checked against the Project's current set of activities.	
4.12	The location of any nearby industrial activities close to Project facilities and infrastructure has been discussed with the Client, to check if they have considered relevant sources of risks, and also the potential to share emergency response resources in the event of a major accident.	
<i>Monitoring and performance evaluation</i>		
4.13	The Client has been asked how health, safety and security performance is monitored, including the specific measures to monitor the health of workers and local communities.	
4.14	Arrangements for monitoring applicable hazards in the working environment have been checked. <i>NOTE: this may include air quality, dust, temperature, vibration, radiation, etc.</i>	
4.15	The way in which the Client's senior management team review the health, safety and security performance of the Project has been discussed.	