

Gaza Health Emergency Response Project (P503036)

**United Nations Children’s Fund (UNICEF) and
World Health Organization (WHO)
Environmental and Social Management Tool**

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1 Introduction

The World Bank is financing the Gaza Health Emergency Response Project implemented by UNICEF and WHO to provide lifesaving emergency health services to the population of Gaza.

The Risks and ESS management plan is prepared to cover the three project components, (i) Component 1: Delivery of Essential Maternal, Newborn, Child Health Care Services and Communicable Disease Treatment, implemented by UNICEF (ii) Component 2: Supporting Provision of Emergency Care and Non-Communicable Disease Services, implemented by WHO and (iii) Component 3: Project coordination and monitoring, common to both agencies.

Component 1: Delivery of Essential Maternal, Newborn, Child Health Care Services and Communicable Disease Treatment, implemented by UNICEF Component 1 is implemented by UNICEF and includes the provision of support for the procurement and delivery of supplies for essential maternal, newborn, and child health services and communicable disease treatment in Gaza.

Component 2: Supporting Provision of Emergency Care and Non-Communicable Disease Services, implemented by WHO

Component 2 is implemented by WHO and includes the provision of support to address immediate emergency and trauma care demands and the ongoing need for delivery of non-communicable disease prevention, screening, and treatment services in Gaza.

Part 3: Project Coordination and Monitoring

(a) Provision of support to UNICEF and WHO for the implementation, monitoring and evaluation, and coordination, of each Agency's respective Component including: (i) the Recipient's Indirect Costs; (ii) Direct Costs required to support implementation of the Project; (iii) costs associated with hiring the TPM (UNICEF); and (iv) costs associated with the scale up of an operational grievance redress mechanism for the Project, as well as any other administrative costs, not covered by (i) through (iv) of this paragraph.

The Risks and ESS management plan serves to improve project quality through a risk informed service delivery and system strengthening, by ensuring that the World Bank, UNICEF and WHO environmental and social standards are considered at each phase of the Project. This plan commits UNICEF and WHO to not implement or support any intervention or project likely to have a significant negative or harmful impact on communities, project workers or the environment. Beyond the 'do-no-harm' principle, the Risks and ESS management plan also represents means to maximize environmental and social opportunities, sustainability, and benefits for project-affected stakeholders, striving to 'do-more-good'.

The objectives of the Risks and ESS management plan are to:

- Provide a framework for environmental and social (E&S) risk and impact management of the project;
- Provide clear procedures and methodologies for environmental and social risk screening, and monitoring of environmental and social risk mitigation measures for activities financed by the Project;
- Describe the appropriate roles and responsibilities of UNICEF, WHO, contractors and other stakeholders;

- Outline the reporting procedures on E&S mitigation measures; and,
- Promote positive environmental and social outcomes.

The Risks and ESS management plan is structured in a way that mitigation measures will be streamlined across existing project activities and sub-activities, for efficacy and efficiency purposes, whenever feasible.

UNICEF and WHO have also prepared an Environmental and Social Commitment Plan (ESCP) and a joint Stakeholder Engagement Plan (SEP) that includes a Community Feedback Mechanism (CFM) and communication strategy.

2 Environmental and Social Policies, Regulations, and Laws

This Risks and ESS management plan is prepared to:

- Meet the objectives and requirements of the World Bank’s Environment and Social Standards (ESS), and the EHS Guidelines;
- Meet UNICEF and WHO’s relevant ES policies, procedures, and guidelines for its respective parts of the project; and
- Meet environmental and social laws and regulations of State of Palestine, where applicable.

2.1 State of Palestine Legal Framework

The Gaza Health Emergency Response Project will apply the relevant national laws and policies, as applicable. Where national laws and policies are inconsistent with the World Bank ESF or UNICEF and WHO Environmental and Social Standards, UNICEF and WHO will look to achieve or implement whichever standards are more stringent.

2.2 World Bank Environmental and Social Framework

The World Bank ESF sets out the World Bank’s commitment to sustainable development. It includes a set of ten ESSs that establish the mandatory requirements that the Borrower and the projects must meet through the project life cycle. The standards establish objectives and requirements to avoid, minimize, reduce, and mitigate environmental and social risks and impacts, and to compensate for or offset any residual impacts. The relevant ESS are presented in Table 1. Please see the [Environmental and Social Review Summary](#) for more information.

Table 1 : Relevant World Bank ESS

World Bank ESS	Relevant?
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant
ESS 2: Labour and Working Conditions	Relevant
ESS 3: Resource Efficiency and Pollution Prevention and Management	Relevant
ESS 4: Community Health and Safety	Relevant
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Relevant
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Relevant
ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Relevant
ESS 8: Cultural Heritage	Not Relevant
ESS 9: Financial Intermediaries	Not Relevant
ESS 10: Stakeholder Engagement and Information Disclosure	Relevant

2.3 UNICEF Risks and Environmental and Social Safeguarding Strategy

UNICEF is in the process of developing a comprehensive set of environmental and social safeguarding policies and procedures that will be applicable to all the Projects it implements. The E&S safeguarding policy and procedures will be based on the [Model Approach to Environmental and Social Standards for UN Programming](#) (UN Environment Management Group, 2019).

UNICEF has drafted a policy on ESS, which is now being finalized for adoption. These standards apply to underpin UNICEF's commitment to mainstream social and environmental sustainability to support sustainable development and broadly align with the World Bank ESF. Through application of the UNICEF ESS, UNICEF enhances the consistency, transparency, and accountability of its decision-making and actions, improves performance, and strengthens achievement of sustainable development outcomes. The main objectives of these standards are:

- Strengthen the quality of programming by ensuring a principled approach (service delivery);
- Avoid adverse impacts to people and the environment;
- Minimize, mitigate, and manage adverse impacts where avoidance is not possible;
- Strengthen UNICEF and partner capacities for managing social and environmental risks (system strengthening);
- Ensure full and effective stakeholder engagement;
- Respond to grievances from project-affected people.

2.4 WHO Risks and Environmental and Social Safeguarding Strategy

WHO HQ is leading in the preparation of a global Environmental and Social Sustainability framework, the draft was shared with WHO country offices for review and feedback. The draft WHO Environmental and Social Sustainability Framework Standards are: ESSS 1: Community Health, Safety and Security; ESSS 2: Climate Change Risk; ESSS 3: Displacement and Resettlement; ESSS 4: Labour and Working Conditions; ESSS 5: Disaster Risk Reduction; ESSS 6: Resource Efficiency, Pollution Prevention and Waste Management; ESSS 7: Biodiversity Conservation and Sustainable Natural Resource Management; ESSS 8: Indigenous Peoples; ESS 9: Cultural Heritage; ESS 10: Stakeholder Engagement.

WHO adheres to World Bank's Environmental and Social Framework (2018) at the country, regional and global levels at all levels.

3 Assessment and Management of Environmental and Social Risks and Impacts

3.1 Organizational Structure

As per World Bank Operational Policy (OP) 7.30 on Dealing with De Facto Governments, the project will be implemented via Third Party Implementation (TPI), whereby UNICEF is the implementing agency of Component 1 and part of Component 3 and WHO is the implementing agency of Component 2 and part of Component 3 under the one-year grant agreement with the World Bank. As such, UNICEF and WHO will:

- Implement its respective parts of the project, either directly or through oversight of contractors;
- Monitor its respective project targets and results in coordination with the TPM and their respective contractors;
- Handle relevant procurement, financial management, and disbursement management including the preparation of withdrawal applications under the project for its respective parts of the Project; and
- Ensure all reporting requirements as per each Agency's respective Project Grant Agreement at met.

In line with ESF ESS1, UNICEF and WHO, through the Project Coordination Committee and their qualified staff, will ensure adequate resources (from regional offices and/or in-country staff) to support management of ESHS risks and impacts of the Project including: (i) assigning and maintaining E&S capacity including Risk and ESS, and Gender/GBV qualified focal points in the regional hub of each agency, and, (ii) once the situation allows, assign qualified ESHS and SEA/SH/GBV focal points in the Country Office with access to Gaza Strip.

Project Coordination Committee: UNICEF and WHO have established the Project Coordination Committee to support the coordination of project implementation, identification and mitigation of project risks, including environmental and social safeguard risks, review of monitoring results and decision making on implementation adjustments to be responsive to the evolving situation in Gaza. The Committee includes representatives from both agencies and the World Bank and meets on a monthly basis.

UNICEF E&S Focal Points: UNICEF has in place a Risk and ESS focal point and Gender focal point to support the overall implementation of environmental and social safeguards for the Project including risk assessment and management, stakeholder engagement, provision of guidance and advice, as well as capacity building support to relevant stakeholders, as required. UNICEF may leverage other organizational expertise including AAP, SBC, Operations & Supply, and others to support the implementation of the ESMT for its respective parts of the Project, as appropriate. The ESS personnel will be supported by the project staff to conduct the management, reporting and monitoring of environmental and social risk management aspects throughout project implementation.

WHO E&S Focal Points: WHO has in place Risk and ESS focal points as well as a Gender / Prevention of sexual exploitation, abuse and harassment focal point. These individuals will support the overall implementation of environmental and social safeguards for the Project including risk assessment and management, stakeholder engagement, provision of guidance and advice, as well as capacity building support to relevant stakeholders, as required. WHO may leverage other organizational expertise including at Regional Office and Headquarters levels as needed to support the implementation of the ESMT for its

respective parts of the Project, as appropriate. The ESS personnel will be supported by the project staff to conduct the management, reporting and monitoring of environmental and social risk management aspects throughout project implementation.

UNICEF and WHO may combine their efforts and share human resources where required to enhance efficiency.

3.2 Environmental and Social Assessment and Management Tools and Instruments

3.2.1 E&S Assessment and Management Tools

The Environmental and Social Management Tool outlines the assessment of key E&S risks and planned mitigation measures applicable for each component of the Project in Chapter 4. Based on this overarching assessment, UNICEF and WHO have developed supporting management plans and tools including:

- Risk Screening Template (Annex A),
- Labour Management Procedures (LMP) (Annex B),
- Sample Code of Conduct (Annex C).

3.2.2 E&S Screening

Prior to the start of activities, each Agency will conduct a risk screening¹ using the Risk Screening Template² in Annex A. The screening will allow Agencies to: (i) identify the risks and impacts potentially arising from sub-project activities and the associated Environmental and Social Standards (ESS); (ii) establish appropriate Environmental and Social risk category for the sub-projects, and; (iii) specify the type of environmental and social risks management measures to be included in the bidding documents. When needed, UN Agencies will liaise with UNMASS to conduct UXO assessment of the site prior to commencing activities. Activity/site-specific E&S requirements and mitigation measures will be informed by those outlined in Chapter 4 and adapted, as appropriate, and to be incorporated in the relevant contracting arrangements. The relevant management tools and instruments above, including the LMP, MWMP for Component 2, and Code of Conduct will also be incorporated in the contracting arrangements, as appropriate.

3.3 Management of Contractors

3.3.1 Contractors

UNICEF and WHO or their contractors will ensure that:

- Relevant aspects of the ESCP, including, inter-alia, activity-specific environmental and social management tools and Labor Management Procedures requirements are included into the ESHS

¹ Risk screening will be based on desk review and UNMASS UXO assessment, as appropriate, until the security situation allows.

² Annex A is meant for screening ES requirements relevant to supplies, the Annex will be updated to address civil works if deemed necessary during the implementation. Given the scope of activities under the current financing, ESMP checklists and ESMPs will not be required.

specifications of the bidding and procurement documents with all implementing partners, contractors, and sub-contractors, including those for all sub-projects by contractors selected for the specific sub-projects.

- Contractors comply and cause sub-contractors to comply with the ESHS specifications of their respective contracts and report on them in line with the requirements of the ESCP and ESMT.
- Relevant project workers sign a code of conduct (Annex X) to uphold ethical standards and relevant E&S obligations and national legislation, prior to carrying out activities on the Project.

3.3.2 Third Party Monitoring Agent

A Third-Party Monitoring Agent (TPMA) will be engaged for the Project. The Terms of Reference (ToR) for the TPMA has been prepared by UNICEF and agreed with WHO and the World Bank. The TPMA will provide independent review of Project implementation and verification of Project results and adherence to all Environmental & Social requirements addressed in the ESCP and all ESHS instruments. Please see section 3.4 for more details.

3.4 Monitoring and Reporting

UNICEF and WHO will monitor the overall implementation of the ESMT for their respective parts of the project. Agencies will also monitor the environmental and social performance of their respective contractors.

As the security situation allows, monitoring will cover:

- Monitoring of ESMT implementation, including monitoring of mitigation measures and monitoring of contractor environmental and social performance
- Training of project staff and contractors, as applicable
- UNICEF & WHO CFM channels

Each agency will prepare and submit to the Bank regular monitoring reports for their respective parts of the Project on the ESHS performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents requirement under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism (also referred to as CFM) and summary of or contractor reports.

UNICEF and WHO will primarily rely on regular reports from the TPM and contractors to monitor the implementation of their environmental and social performance. When the security situation allows, UNICEF and WHO will complement the TPM's work by conducting field monitoring visits.

Contractors are responsible for monitoring and reporting on the implementation of the environmental and social requirements at project sites and by sub-contractors (if relevant). Regular monitoring reports on the ESHS performance will include, but are not limited to, the implementation of the activity specific environmental and social management tool/measures related to medical waste management, labour and occupational health and safety, community health and safety, and GM implementation, as applicable.

The **Third-Party Monitoring Agent** will provide an independent review of Project implementation and

verification of Project results and adherence to all Environmental & Social requirements addressed in the ESCP and all ESHS instruments, including through, inter alia: periodic site visits, assessment of local context and conditions, interviews, awareness raising, training and preparation of reports. Each monitoring report prepared by the TPMA shall cover a period of three (3) months. UNICEF will ensure that the TPMA quarterly reports are shared simultaneously with the Bank upon its delivery to UNICEF and in accordance with the Grant Agreement.

Significant Event Reporting

Contractors are responsible for reporting all E&S incidents and accidents to the respective agency in a timely manner, as outlined in the ESCP.

UNICEF and WHO will notify the Association no later than 48 hours after learning of and confirming any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, accidents that result in death, serious or multiple injury, among others.

Subsequently, at the Association’s request, the relevant Agency shall prepare a report within 15 days on the incident or accident and propose any measures to address it and prevent its recurrence to the extent that the cause of the significant event is within the scope of the Agency’s control.

4 Potential Environmental and Social Risks and Mitigation Measures

The following chapter outlines the risks and mitigation measures that UNICEF, WHO and their partners will implement to manage the potential adverse impacts on the people and on the environment and to improve the overall environmental and social performance of the project. The World Bank has assessed the overall Environmental and Social Risk Classification for the Project to be Substantial. UNICEF and WHO align with the Project E&S Risks classification. The below summarizes the detailed risks and mitigation measures based on this classification. The proposed mitigation measures are expected to be operationalized before the start of any activity, and will be integrated in agreements and contracts with, respectively, UNICEF and WHO’s contractors.

4.1 UNICEF Risk and ESS Management Plan (Component 1)

4.1.1 WB ESS 2: Labor and working conditions (Workers Risk Management) (ref. Annex A on LMP)

RISK DESCRIPTION	MITIGATION MEASURE	RESPONSIBLE ENTITY
1. Child and forced labor Risk rating: Moderate	1.1 Ensure the existence of contractual requirements on prevention of child labour with a minimum age of 18	Contractors
	1.2 Provide workers with contracts in accordance with national labour laws and procedures	Contractors

	1.3 Train and sensitize contractors on the Code of Conduct (CoC), with a focus on child labor and forced labor	UNICEF
	1.4 Ensure subcontractors are trained and sensitized on the Code of Conduct, with a focus on child labor and forced labor	Contractors
	1.5 Submit the signed CoC, including for subcontracted workers	Contractors
2. Discrimination Risk rating: Low	2 2.1 Require fair treatment of workers, non-discrimination, and equal opportunities and ensure all stakeholders are treated with respect, equal chances, and dignity	Contractors
	2.2 Train and sensitize contractors on the Code of Conduct, with a focus on discrimination	UNICEF
	2.3 Ensure subcontractors are trained and sensitized on the Code of Conduct, with a focus on discrimination	Contractors
	2.4 Submit the signed CoC, including for subcontracted workers	Contractors
3. GBV related risks (e.g., SEA/SH incidents) Risk rating: Moderate	3.1 Maintain safe and accessible reporting mechanisms in consultation with women and girls	UNICEF & Contractors
	3.2 Include a Prevention of Sexual Exploitation and Abuse (PSEA) requirement in contractual agreements	Contractors
	3.3 Train and sensitize contractors on the Code of Conduct, with a focus on PSEA, GBV risk mitigation, and how to safely handle incident reporting and management	UNICEF
	3.4 Ensure subcontractors are trained and sensitized on the Code of Conduct, with a focus on PSEA, GBV risk mitigation and how to safely handle incident reporting and management	Contractors
	3.5 Submit the signed CoC, including for subcontracted workers	Contractors
4. Other risks related to the safety of services, including child safeguarding/human right violations Risk rating: Moderate	4.1 Implement security protocols, in accordance with United Nations Security Management System (UNSMS)	UNICEF & Contractors
	4.2 When the security situation allows, train contractors on child rights, child protection and child safeguarding – ensure participants are aware of how to prevent, identify and respond to the	UNICEF

	above, including identification of local resources to support vulnerable and at-risk children, and referral/reporting mechanisms when CR/CP/CS violations occur	
<p>5. Inappropriate working conditions and OHS</p> <p><i>E.g., including, inter alia, occupational health and safety on project workers, and healthcare workers at hospital/health care facilities facing infectious disease risks, improper handling of vaccine, laboratory testing, and improper handling, disposal, and transport of medical waste</i></p> <p>Risk rating: Substantial</p>	5.1 Provide workers with contracts in accordance with national labour laws and procedures	Contractors
	5.2 If the security situation allows, ensure adequate provision of hygiene facilities (toilets, hand-washing basins), resting areas, etc. separated by gender, as needed	Contractors
	5.3 Provide PPE as suitable to the technical task and related hazards of each worker, without cost to the worker	Contractors
	5.4 Provide First Aid equipment and facilities in accordance with the national labour laws and procedures	Contractors
	5.5 Require all workplace health and safety incidents to be properly recorded in a register and reported to UNICEF in compliance with the terms set in the ESCP	Contractors
	5.6 If the security situation allows, provide workers with proper communication channels in areas of poor connectivity	Contractors
	5.7 Provide training on Occupational Health and Safety	Contractors
	5.8 Provide training on safe handling of medical supplies	
	5.9 On risks related to inadequate Medical Waste Management for project workers, ref. ESS 3 (risk #1)	UNICEF and/or Contractors
<p>6. Road safety</p> <p>Risk rating: Substantial</p>	6.1 Implement security protocols, in accordance with UNSMS	UNICEF & Contractors
	6.2 Ensure workers are trained on road safety measures (included in CoC)	Contractors
	6.3 Require all vehicle drivers to have appropriate licenses	Contractors
	6.4 Use well maintained vehicles, trucks, and equipment	Contractors
	6.5 Require UNICEF personnel to comply with UNICEF's vehicle fleet and road safety/management policies, procedures, and guidelines	UNICEF
7. Exposure to anthropogenic hazards:	7.1 Implement security protocols, in accordance with UNSMS	UNICEF & Contractors

<ul style="list-style-type: none"> - Terrorism - Armed conflict - Crime - Civil unrest - Human rights violations (including child safeguarding) <p>Exposure to natural hazards:</p> <ul style="list-style-type: none"> - Epidemic/pandemic (communicable disease outbreak) - Drought - Heatwaves - Floods <p>Risk rating: Substantial</p>	7.2 Ensure partners are timely informed of any conflict related or natural related event in the project areas and adjust activity implementation accordingly	UNICEF
	7.3 Regularly conduct consultations with relevant authorities	UNICEF & Contractors
	7.4 Provide PPE for risks related to the security situation and to the spread of communicable diseases, without cost to the worker	UNICEF & Contractors
	7.5 If the security situation allows, provide workers with proper communication channels in areas of poor connectivity	UNICEF & Contractors
	7.6 Whenever feasible, liaise with the United Nations Agency for Mine Action Services (UNMAS) to assess and confirm that no unexploded ordnances (UXO) are present in place prior to commencing the works – and inform partners accordingly	UNICEF

4.1.2 WB ESS 3: Resource Efficiency and Pollution Prevention and Management

RISK DESCRIPTION	MITIGATION MEASURE	RESPONSIBLE ENTITY
<p>1. Waste:</p> <ul style="list-style-type: none"> - Solid - Chemical - Infectious - Pharmaceutical <p><i>E.g., labs materials and tests, obsolete vaccines, medical consumables, and associated healthcare and hazardous waste (from emergency care) waste, and its handling, disposal and transfer</i></p> <p>Risk rating: Substantial</p>	1.1 Where feasible and when the security situation allows, obtain information on the medical waste management practices of the targeted Health Facilities (HFs) and collaborate with waste management authorities to apply waste management regulations and promote environmental sustainability.	UNICEF
	1.2 When the security situation allows, train the HF personnel on how to: <ul style="list-style-type: none"> - Collect and properly manage all solid and liquid wastes in a timely manner - Deposit or discharge toxic liquids, chemicals, fuels, lubricants, and bitumen into adequate containers for salvage or subsequent removal to off-site locations - Label waste using easily understandable symbols - Follow safety guidelines for the storage, transport, and distribution of hazardous materials including waste to minimize the potential for misuse, spills, and accidental human exposure 	UNICEF and/or Contractors

4.1.3 WB ESS 4: Community Health and Safety

RISK DESCRIPTION	MITIGATION MEASURE	RESPONSIBLE ENTITY
<p>1. Exposure to road accidents and incidents caused by project workers</p> <p>Risk rating: Low</p>	Ref. ESS 2 (risk #7) and ESS 3 (risk #1)	Contractors
<p>2. Exposure to anthropogenic hazards:</p> <ul style="list-style-type: none"> - Terrorism - Armed conflict - Crime - Civil unrest - Human (including child) rights violations <p>Exposure to natural hazards:</p> <ul style="list-style-type: none"> - Epidemic/pandemic (communicable disease outbreak) - Drought - Heatwaves - Floods <p>Risk rating: Substantial</p>	Ref. ESS 2 (risk #8)	Ref. ESS 2 (risk #8)
<p>3. Other risks related to the inadequate MWM</p> <p>Risk rating: Substantial</p>	Ref. ESS 3 (risk #1)	Ref. ESS 3 (risk #1)
<p>4. Health risks specific to the proximity between project workers and the targeted communities – transmission of communicable diseases</p> <p>Risk rating: Moderate</p>	<p>4.1 Ensure the utilization of PPEs, as appropriate, to prevent/reduce the spread of any infections and communicable disease outbreaks</p>	UNICEF & Contractors
	<p>4.2 When the security situation allows, sensitize the community on importance of the routine immunization and campaigns and provide information on how to access vaccinations</p>	UNICEF & Contractors

<p>5. GBV related risks (e.g., SEA/SH incidents) and other risks related to child safeguarding/human right violations</p> <p><i>E.g., increase in stigma and isolation of people seeking sensitive treatments</i></p> <p>Risk rating: Moderate</p>	<p>5.1 Ref. ESS 2 (risk #4 and #5)</p>	<p>Ref. ESS 2 (risk #4 and #5)</p>
<p>6. Risks of social exclusion/tensions at community level</p> <p><i>E.g., focus on comparatively marginalized groups such as women headed household and widows, persons with disabilities, the elderly and the poor</i></p> <p>Risk rating: Moderate</p>	<p>6.1 Ref. ESS 2 (risk #2, #3 and #4) and ESS 10</p>	<p>Ref. ESS 2 (risk #2, #3 and #4) and ESS 10</p>

4.1.4 WB ESS 10: Stakeholder Engagement and Information Disclosure

Risks related to ESS 10 mainly refer to the lack of/limited awareness of the GM and project acceptance, ownership, sustainability, and accountability. Key mitigation measures, including engagement strategies, consultation and disclosure requirements and the community feedback mechanism are detailed in the Stakeholder Engagement Plan (SEP). A summary of consultation and disclosure requirements and the CFM are provided below. For more information, please refer to the SEP.

Consultation and Disclosure Requirements

For each subproject, UNICEF and WHO will engage with affected communities, including host communities, through the process of stakeholder engagement described in the SEP. UNICEF and WHO will initiate consultations with individuals and communities that might be affected by the subproject, directly from the start of the project. The purpose of the consultations will be to: (i) inform stakeholders about the activities to be undertaken, possible impacts, and (ii) document and address their concerns. Consultation summaries should be prepared, including who was consulted, where and when, what concerns were expressed, and how these concerns were addressed. Furthermore, all stakeholders participating to the consultation will be informed on the Project Community Feedback Mechanism (CFM) and where/how complaints can be made.

The consultation process will take into account the sociocultural context of the State of Palestine. Consultations can take the form of focus groups, discussions with elders/community leaders, or interviews, where/when the security context allows. If applicable, separate consultations will be done for women to ensure that any special concerns and needs are considered before and during the project implementation. In light of the fragility, conflict, and violence (FCV) context of the State of Palestine, UNICEF and WHO will ensure that Project Affected Person (PAPs) are not exposed to risks as part of their participation in consultations, for example by avoiding large meetings, and not disclosing personal information/photos.

Community Feedback Mechanism (CFM)

UNICEF will apply the Project Community Feedback Mechanism (CFM) detailed in the Project **Stakeholder Engagement Plan (SEP)**, to all subprojects. The CFM is gender and age-inclusive and responsive and address potential access barriers to women, the elderly, the disabled, youth and other potentially marginalized groups as appropriate to the Project. The CFM will not impede access to judicial or administrative remedies as may be relevant or applicable and will be readily accessible to all stakeholders at no cost and without retribution.

Information about the Grievance Mechanism and how to make a complaint and/or grievance must be communicated during the stakeholder engagement process and placed at prominent places for the information of the key stakeholders.

The CFM also handles anonymous complaints, though the extent to which action can be taken to address them will depend on the information the caller is willing to provide. Where the complainant is not satisfied with the resolution, grievances can also be escalated. The CFM system has agreed referral pathways for GBV cases/complaints to refer them to the appropriate channels. Please refer to the SEP for details on the CFM process.

4.2 WHO’s Risk and ESS Management Plan (Component 2)

4.2.1 WB ESS 2: Labor and working conditions (Workers Risk Management) (ref. Annex A on LMP)

RISK DESCRIPTION	MITIGATION MEASURE	RESPONSIBLE ENTITY
1. Child and forced labour Risk rating: Moderate	1.1 Ensuring the contractual requirements are existed on prevention the child (with minimum age of 18) and forced labour including the application of CoC requirements, awareness sessions on the requirements where needed.	WHO & Contractors
	1.2 Ensure subcontractors are trained and sensitized on the Code of Conduct.	Contractors
	1.3 Submit the signed CoC, including for subcontracted workers	Contractors
2. Discrimination Risk rating:	2.1 Require fair treatment of workers, non-discrimination, and equal opportunities and	Contractors

Low	ensure all stakeholders are treated with respect, equal chances, and dignity	
	2.2 Train and sensitize contractors on the Code of Conduct, with a focus on discrimination	WHO
	2.3 Submit the signed CoC, including subcontracted workers	Contractors
3.GBV related risks (e.g., SEA/SH incidents) Risk rating: Moderate	3.1 Maintain safe and accessible reporting mechanisms in consultation with women and girls	WHO & Contractors
	3.2 Include a PSEA requirement in contractual agreements	Contractors
	3.3 Train and sensitize contractors and subcontractors on the Code of Conduct, with a focus on PSEA, GBV risk mitigation, and how to submit a complaint safely and confidentially.	WHO
	3.4 Submit the signed CoC, including subcontracted workers	Contractors
4.Other risks related to the safety of services, including child safeguarding/human right violations Risk rating: Moderate	4.1 Implement security protocols, in accordance with United Nations Security Management System (UNSMS)	WHO& Contractors
	4.2 When security allows, train contractors on child rights, child protection and child safeguarding	WHO
5. Risks of exposure to health risks while handling medical specimens, including inadequate measures, and understanding of OHS. Risk rating: Substantial	5.1 Provide workers with contracts in accordance with national labor laws and procedures	Contractors
	5.2 Provide adequate provision of PPE hygiene and waste management materials (trolleys, pins, safety boxes and hand-washing soaps) for waste management workers.	WHO/Contractors
	5.3 Provide PPE as suitable to the technical task and related hazards of each worker, without cost to the worker	Contractors
	5.4 Provide First Aid equipment and facilities in accordance with the national labor law	Contractors
	5.5 Require all workplace health and safety incidents to be properly recorded in a	Contractors

	register and reported to WHO and the World Bank as per the ESCP	
	5.6 Provide training on Occupational Health and Safety	Suppliers
	5.7 If the security allows, ensure adequate provision of hygiene materials (including soap, liquid soap, chlorine, etc..) to the targeted health facilities	WHO
6. Road safety Risk rating: Substantial	6.1 Implement security protocols, in accordance with UNSMS	WHO & Suppliers
	6.2 Ensure workers are trained on road safety measures (included in CoC)	Suppliers
	6.3 Require all vehicle drivers to have appropriate licenses	Suppliers
	6.4 Use well maintained vehicles, trucks, and equipment	Suppliers
7. Exposure to anthropogenic hazards: -Terrorism -Armed conflict -Crime -Civil unrest -Human rights violations (including child safeguarding) Exposure to natural hazards: -Epidemic/pandemic (communicable disease outbreak) -Drought -Heatwaves -Floods Risk rating: Substantial	7.1 Implement security protocols, in accordance with United Nations Security Management System (UNSMS).	WHO & Suppliers
	7.2 Ensure partners are timely informed of any conflict related or natural related event in the project areas and adjust activity implementation accordingly	WHO
	7.3 Regularly conduct consultations with relevant authorities	WHO & Suppliers
	7.4 Provide PPE for risks related to the security situation, without cost to the worker	WHO & Suppliers
	7.5 Include awareness sessions on Environmental and Social standards and climate change and its effect on the health systems in all capacity building sessions.	WHO

4.2.2 WB ESS 3: Resource Efficiency and Pollution Prevention and Management

RISK DESCRIPTION	MITIGATION MEASURE	RESPONSIBLE ENTITY
1.Waste: Solid Chemical Infectious	1.1 Where feasible and when the security situation allows, obtain information on the medical waste management practices of the targeted Health Facilities (HFs)	WHO/Environmental specialist

<p>Pharmaceutical</p> <p><i>E.g., labs materials and tests, obsolete vaccines, medical consumables, and associated healthcare and hazardous waste (from emergency care) waste, and its handling, disposal, and transfer</i></p> <p>Risk rating: Substantial</p>	<p>1.2 Where feasible and when the security situation allows, train the HF personnel on how to:</p> <p>Collect and properly manage all solid and liquid waste in a timely manner.</p> <p>Deposit or discharge toxic liquids, chemicals, fuels, lubricants, and bitumen into adequate containers for salvage or subsequent removal to off-site locations.</p> <p>Label waste using easily understandable symbols or pins of different colors.</p> <p>Follow safety guidelines for the storage, transport, and distribution of hazardous materials including waste to minimize the potential for misuse, spills, and accidental human exposure</p>	<p>WHO& Contractors</p>
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4.2.2 WB ESS 4: Community Health and Safety

RISK DESCRIPTION	MITIGATION MEASURE	RESPONSIBLE ENTITY
<p>1. Exposure to road accidents and incidents caused by project workers</p> <p>Risk rating: Low</p>	<p>1.1 Where necessary, signs and instructions on the relevant safe working procedures are provided in the work areas, in Arabic language as required,</p>	<p>Contractors</p>
	<p>1.2 Project CFM channels availability for workers in which the handling and response to such grievances is implemented with high priority.</p>	<p>WHO/Contractors</p>
	<p>1.3 Project workers (irrespective of contracts being full-time, part-time, or temporary) to be covered by insurance against occupational incidents as determined in the applicable labor law</p>	<p>WHO/Contractors</p>
	<p>1.4 Workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken, and reported to WHO and the World Bank maximum within 48 hours in compliance with the terms set in the project ESCP.</p>	<p>WHO/Contractors</p>
<p>2. Exposure to anthropogenic hazards: Terrorism</p>	<p>2.1 Coordination with authorities to assess the security risks and avoid operating in high-risk areas or environment</p>	<p>WHO</p>

Armed conflict Crime Civil unrest Human (including child) rights violations . Exposure to natural hazards: Epidemic/pandemic (communicable disease outbreak) Drought Heatwaves Floods Risk rating: Substantial	2.2 Including the security issues, risks, and mitigations during the stakeholders' engagement activities.	WHO
	2.3 Any concerns or grievances about the security issues will be received, monitored, documented, and addressed through the grievance mechanism	WHO
3.Other risks related to the inadequate MWM Risk rating: Substantial	3.1 When the security situation allows, implement appropriate measures following the local regulations as well as the MWMP that has been developed based on Environment, Health and Safety (EHS) Guidelines of the World Bank and Good International Industry Practice (GIIP), in addition to the applicable WHO guidance documents and other best international practices to prevent or minimize such adverse impacts.	WHO
	3.2 When the security situation allows, Monitoring of the implementation of adequate waste management practices during the various project stages and the necessary corrective/preventive actions will be determined and tracked.	WHO/TPM
	3.3 When the security situation allows, Training on IPC and waste management requirements will be provided under the Project to HCWs involved in the supported healthcare facilities or activities.	WHO
	3.4 When the security situation allows, supported healthcare facilities will be provided with waste management supplies and PPE for appropriate protection from any adverse impacts	WHO
4.Inadequate quality of the supplies Risk rating:	4.1 Ensure that end user and post distribution monitoring is conducted on the delivered supplies and on the recipients.	WHO

Low	4.2 Ensure the recipients of the supplies (health workers, end users, etc.) are aware of the available grievance mechanism and know how to access it	
5. Health risks specific to the proximity between project workers and the targeted communities. Risk rating: Moderate	5.1 Ensure the utilization of PPE, as appropriate, to reduce the spread of any infections and prevent the outbreaks	WHO & Contractors
6. GBV related risks (e.g., SEA/SH incidents) and other risks related to child safeguarding/human right violations. <i>E.g., increase in stigma and isolation of people seeking sensitive treatments.</i> Risk rating: Moderate	6.1 Contractual obligations to reduce SEA/SH risks and enforcement of CoC requirements on the contractors and contracted staff.	WHO
	6.2 When the security situation allows, enhanced multi-sectoral coordination, training, and monitoring mechanism to implement SEA/SH mitigation measures in an effective manner.	WHO
	6.3 When the security situation allows, training to Project workers on the GBV, SEA/SH risks and applicable mitigations.	WHO
	6.4 Strengthening CFM to effectively handle SEA/SH complaints through collaboration with NGOs with the expertise to address cases of SEA/SH.	WHO
7. Risks of social exclusion/tensions at community level <i>E.g., focus on comparatively marginalized groups such as women headed household and widows, persons with disabilities, the elderly and the poor</i> Risk rating: Moderate	7.1 Determination of needs and requirements will be performed by the WHO in cooperation with the relevant health authorities with transparent criteria and public communication of the project services, benefits, supported facilities, and any other benefits.	WHO
	7.2 The distribution of benefits will cover all governates and the Project will work with the relevant authorities towards ensuring all citizens will have equal opportunities in getting the project benefits including the recruitment chances.	WHO
	7.3 Strengthen communication with stakeholders, at all levels, during the various Project stages.	WHO
	7.4 Widely disseminating the CFM channels that enable affected community members or beneficiaries to send his/her grievance	WHO

4.2.3 WB ESS 10: Stakeholder Engagement and Information Disclosure

For Component 2, the same measures as described in section 4.1.4 will be applied in relation to ESS10.

5 Capacity Building and Training

UNICEF and WHO have the responsibility for ensuring systems are in place so that relevant employees, contractors, and other workers are aware of the environmental and social requirements for project implementation, including the ESMT.

The design of training activities shall take into account differing levels of capacity, responsibility, ability, language skills, literacy and risk exposure. UNICEF and WHO will continue to report on the status of capacity building activities as part of regular progress reporting. Contractors will report on the implementation of capacity building activities as part of their regular progress reports to UNICEF and ensure that persons under their control performing tasks related to environmental and social risk management have relevant training or experience.

5.1 UNICEF Training and Capacity Building

The following capacity building and training programmes will be in place, as part of capacity building activities of UNICEF staff and contractors:

- PSEA, GBV risk mitigation, Child Safeguarding policies and procedures, risk mitigation measures and reporting mechanism;
- Occupational Health, Safety and Environment, road safety measures, and security;
- Code of Conduct, with a focus on all the listed risks;
- Community engagement and right based approach to ensure that they will understand Charter of the United Nations and UNICEF's core values;
- Accountability to affected population and CFM principles, mechanisms, reporting and counseling.

5.2 WHO Training and Capacity Building

The following capacity building and training programmes will be in place as part of capacity building activities of WHO staff and contractors:

- SEA/SH risk mitigation.
- Occupational health and safety.
- Waste management at health facilities.
- Stakeholder engagement and CFM principles and mechanism.
- Community health and safety).

Annex A. Screening Tool for E&S Risks

UNICEF and WHO will use this form to screen for the potential environmental and social risks and impacts of a proposed sub-project. The form will allow UNICEF and WHO to: (i) identify the risks and impacts potentially arising from sub-project activities and the associated Environmental and Social Standards (ESS); (ii) establish appropriate Environmental and Social risk category for the sub-projects, and; (iii) specify the type of environmental and social risks management measures required.

This Annex is meant to be utilized for screening ES requirements relevant to supplies; it will be updated to address civil works, if deemed necessary during the implementation.

The Screening Form is not a substitute for project-specific environmental and social assessments or specific mitigation plans

Subproject Name	
Subproject Location	
Implementation stage of subproject	
Risk level (low, moderate, substantial or high) with brief justification	
Date of screening	
Consultation Summary	
Observations/Comments	
Signature of responsible ESS Specialist	
Approved by management Dep Rep/Section Chief	

Exclusion list:

The first step in addressing a subproject's environmental and social risks and impacts is to recommend for exclusion as ineligible for UNICEF support all subprojects that include any of the following attributes:

- Production or activities involving harmful or exploitative forms of forced labour/harmful child labour or safety concerns for workers and communities.
- Activities involving production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Activities involving production or trade in weapons and munitions.
- Activities that have engagement with gambling, casinos, and equivalent enterprises.
- Activities that have linkages to trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species of Wild Fauna and Flora.
- Activities that include production or trade in radioactive materials.
- Production or trade in or use of un-bonded asbestos fibers.
- Activities that involve production or trade in wood or other forestry products from unmanaged forests.
- Activities that have production, trade or use of products containing Polychlorinated Biphenyls.
- Activities that have production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals.
- Activities that support production or trade in pharmaceuticals subject to international phase outs or bans.
- Activities that support production or trade in pesticides / herbicides subject to international phase outs or bans.

- Activities that support production or trade in ozone depleting substances subject to international phase out.
- Activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such people.
- Investments in extractive industries; commercial logging.
- Dams, or projects involving allocation or conveyance of water, including inter-basin water transfers or activities resulting in significant changes to water quality or availability.
- Subprojects with high environment or high social risks.
- Activities that would significantly convert natural habitats or significantly alter potentially important biodiversity and/or cultural heritage areas.
- Activities that would require land acquisition and/or restrictions on land use.
- Activities in disputed areas.

Question	Answer		Comments	Relevant ESS
	Y	N		
Does the subproject involve civil works including new construction, expansion, upgrading or rehabilitation of existing infrastructure?				ESS1
Does the subproject involve the recruitment of workers including direct, contracted, primary supply, and/or community workers?				ESS2
Has the subproject included a review of applicable labour national requirements?				ESS2
Will the activity require a larger contractor workforce?				ESS2
Does the subproject have appropriate OHS procedures in place, road safety measures and an adequate supply of PPE (where necessary)?				ESS2
Does the subproject include a risk of child and/or forced labour?				ESS2
Is there any other security risk to project workers triggered by project activities?				ESS2
Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk?				ESS2/ESS4
Is the subproject associated with any external waste management facilities such as a sanitary landfill, incinerator, or wastewater treatment plant?				ESS3
Does the subproject have an adequate system in place (capacity, processes and management) to address waste (hazardous and non hazardous)?				ESS3
Would the potential outcomes of the project be sensitive or vulnerable to potential impacts of climate change?				ESS3
Is there a risk that the selection of the activity location or beneficiaries will lead to community tensions or conflict, including discrimination?				ESS4
Will the activity include payments or cash transfers?				ESS4
Does the subproject involve use of security or military personnel during construction and/or operation of healthcare facilities and related activities?				ESS4
Can the activity contribute to the spread of disease (e.g., health facilities)?				ESS4
Is there any other security risk to the community triggered by project activities, including exposure to road accidents and incidents caused by project workers?				ESS4
Could the project expose more people to natural hazards or make some people more vulnerable to natural hazards?				ESS4
Does the subproject have a GM in place, to which all workers and beneficiaries, and local communities have access, designed to respond quickly and effectively?				ESS10

Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?				ESS10
Are women likely to participate in decision-making processes in regard to the subproject?				ESS10
Is there a risk that exclusion of beneficiaries leads to grievances?				ESS10

Conclusions of the screening:

1. Indicate the proposed environmental and social risk ratings⁵ (Substantial, Moderate or Low), and provide justifications.
2. Indicate the proposed environmental and social risk management requirements that must be integrated in the contracts (responsibilities, resources, timeline).

Annex B. Labour Management Procedures (LMP)

The Labour Management Procedures (LMP) are prepared in line with the requirements of World Bank's ESS2: Labour and Working Conditions. The purpose of the LMP is to facilitate planning and implementation of the project's labour requirements. The LMP describes the requirements and expectations in terms of compliance, reporting, roles and responsibilities, monitoring and training with respect to labour and working conditions in the project.

These procedures apply to all project workers including direct and contracted employed by the project. The LMP sets out the project's approach to meeting national requirements as well as the objectives of UNICEF's and WHO's respective Social and Environmental Standards and Procedures and the World Bank's Environmental and Social Framework.

The key objectives of the LMP include:

- Promote health and safety at work,
- Promote fair and equitable labour practices for the fair treatment, non-discrimination and equal opportunity of workers engaged under the project.
- Prevent the use of all forms of forced and child labour.
- Protect project workers' rights and ensure the management and control of activities that may pose labour-related risks.
- Protect project workers with accessible means to raise workplace concerns.
- Prevent any form of workplace GBV/SEA/SH.

The LMP has been prepared based on the potential labour risk impacts and mitigation measures outlined in Section 4.1.1 of the ESMT. The LMP is a living document and will be reviewed and updated throughout development and implementation of the project.

National Legislation

State of Palestine has drafted policies and established institutions and responsibilities for labor management, joined international conventions and developed sector legislation and procedures.

Contracted workers will be governed by the Local Labor Law policies. In cases where the National Labor Code does not meet appropriate standards, ESS2 will apply.

Grievance Mechanism for Project Workers

Each agency will require its contracted workers to establish and/or maintain a grievance mechanism for their own workers. In the absence of an available GM at the contractor level, project workers (as well as all project stakeholders) may access the Community Feedback Mechanism as described in Chapter 4 of the ESMT as well as in the Stakeholder Engagement Plan.

UNICEF Overview of Labor Use on the Project (Components 1 & 3)

UNICEF Direct Workers

Direct workers include all persons engaged directly by UNICEF to work specifically in relation to the project. They include current and new UNICEF staff members and consultants³, who will be assigned to work on the Project.

UNICEF will be responsible for day-to-day coordination of the Project activities, including:

- Carrying out Project financial management and procurement activities.
- Monitoring and evaluating Project activities and preparing Project progress reports
- Ensuring compliance with the Environmental and Social Commitment Plan (ESCP) requirements and environmental and social instruments referred to therein; and
- Coordinating with other stakeholders on Project implementation.

UNICEF Contracted Workers

UNICEF will engage contractors, and/or service providers to implement activities under Component 1 of the Project to deliver and monitor the provision of equipment, medical and non-medical supplies, micronutrients for pregnant women and the treatment of common childhood illnesses, malnutrition, diarrhoea, and skin infections. Contracted workers will be engaged in accordance with UNICEF standard policies and procedures and governed by local labour law policies. The number of contracted workers will be confirmed upon the start of implementation.

Labour Management Roles and Responsibilities for UNICEF Project Components

UNICEF

UNICEF is the Implementing Agency for Component 1 & part of Component 3 and responsible to hire the direct workers. An appropriate project structure will be established to carry out such key functions as coordination, technical design and oversight, planning and quality assurance – including through environmental and social risk management, fiduciary management, monitoring and evaluation, and reporting.

UNICEF will be responsible for supervising and supporting contractors which will be contracted to carry-out project specific tasks. Contractors are responsible for employing project workers to perform these tasks. UNICEF will be responsible for:

- Establishment of the LMP
- Ensure implementation of the key provisions of the LMP among its direct staff and consultants
- Inform contractors of the provisions of the LMP and ensure provisions on key requirements are included in the contracts.
- Updating this procedure when necessary in the course of preparation, development and implementation of the project
- Maintain records of recruitment and employment process of direct workers
- Monitor that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation, where applicable
- Monitor training of project workers on OHS, where applicable

³ UNICEF Staff follow the UN/UNICEF internal Staff Rules, Policies, Procedures and Guidelines and do not follow local legislation.

- Inform direct staff and contractors of available community feedback mechanisms.
- Ensure all contractors sign a Code of Conduct

UNICEF E&S Focal Points: UNICEF has in place a Risk and ESS focal point and Gender focal point to support the overall implementation of environmental and social safeguards for the Project including risk assessment and management, stakeholder engagement, provision of guidance and advice, as well as capacity building support to relevant stakeholders, as required. This includes support for the implementation and monitoring of the LMP. UNICEF may leverage other organizational expertise including AAP, SBC, Operations & Supply, and others to support the implementation of the ESMT for its respective parts of the Project, as appropriate. The ESS personnel will be supported by the project staff to conduct the management, reporting and monitoring of environmental and social risk management aspects throughout project implementation.

Contractor Management: UNICEF will use its own procurement procedures for solicitations and contracts. UNICEF will make reasonable efforts to ascertain that the contractor who will engage contracted workers is a legitimate and reliable entity and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the bidding documents. As part of the process to select the contractors/service providers who will engage contracted workers, UNICEF reviews the following documentation for vendor pre-qualification and registration:

- UNGM registration number
- Copy of valid official registration documents includes: Trade registration certificate, Taxpayer card
- Supplier profile Signed & stamped of UN Code of conduct document.
- Official Bank letter – signed & stamped - shows (Company Name, Bank account, and currency).
- Screening against UN Sanctions list
- In addition, for high-value contracts (greater than USD \$100,000), the following are mandatory:
 - Two-year set of financial statements for the full financial year signed/stamped (preferably audited)
 - Certificate of incorporation
 - Vendor’s contact details’ contact person, e-mail, and telephone number
 - Screening against UN Sanctions list

Contractual Provisions and Non-Compliance Remedies: UNICEF will incorporate the agreed labour management requirements as specified in the bidding documents into contractual agreements with the contractor/service provider, together with appropriate non-compliance remedies (such as the provision on withholding percentage of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; and removal of personnel from the works.). In the case of subcontracting, UNICEF will require the contractor/service provider to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

Performance Monitoring: UNICEF will monitor the performance of contractors in relation to the LMP as part of the periodic E&S reporting. The monitoring may be conducted through contractor self-reporting and/or third-party monitoring, of project locations or work sites and/or of labour management records and reports compiled by the contractor. Contractors’ labour management records and reports that should be reviewed would typically include the following:

- Representative samples of employment contracts and signed code of conduct;
- Grievances received from the community and workers and their resolution;
- Reports relating to fatalities and incidents and implementation of corrective actions;
- Records relating to incidents of non-compliance with national Labour Code and the provisions of the LMP; and
- Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

UNICEF Contracted Workers

Contractors will be responsible for engagement and management of personnel and sub-contractors, ensuring compliance with project protocols and providing labour instructions on safety and security. Implementing Partners and contractors will be responsible for the following:

- Comply with ESHS measures included in the ESMT and this labour management procedure. These measures will apply to contracted and sub-contracted workers
- Maintain records of recruitment and employment process of contracted workers
- Clearly communicate job description and employment conditions to contracted workers
- Report any incidents and accidents (in line with the definition of the ESCP) to UNICEF in a timely manner
- Establish / maintain a grievance mechanism for their own workers
- Have a system for regular review and reporting on labour, and occupational safety and health performance
- Ensure all contracted workers sign a Code of Conduct

WHO Overview of Labour Use on the Project (Components 2 & 3)

WHO Direct Workers

Direct workers include the Project Management Unit. The estimated number of direct workers in the WHO/PMU would be around 10 workers of various disciplines. In addition, several other WHO staff will contribute to project implementation.

The Project management Unit (PMU) inside WHO is established to carry out such key functions as coordination, fiduciary, monitoring and evaluation, and reporting. The technical officers within the WHO country office assist the PMU when needed.

In addition to staff required for the full duration of the Project, the Project may directly hire other technical staff for limited duration based on specific needs (International and national experts hired on short-term basis).

WHO Contracted Workers

Contractors to ensure that the requirements are communicated to their employees, parent, subsidiary, and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. No community workers will be engaged in the implementation of component 2.

Service providers' workers

These include those contracted workers who are providing services to the project.

Consultancy workers

The expected number of consultants (firms and individuals) and potentially their collaborators (staff and sub-consultants) is not known yet.

Consultants will be locally recruited, it is expected that any of their workers or sub-consultants would also be nationals, professionals, with fixed term or casual. In all cases, no child or forced labor will be contracted. Labor terms and conditions, including their rights related to hours of work, wages, overtime, compensation, and benefits, will be governed by the Palestinian Labor Law and the relevant provisions of ESS2.

Contracted supply workers

The project will hire contractors to deliver the needed supplies to the targeted Health Facilities. This might include medicines and consumable supplies (PPE, etc.). The estimated number of workers is not known yet. No child or forced labor will be engaged. It is expected that the medical supply workers who are delivering the supplies to the Health Facilities are engaged during the project implementation.

Primary supply workers

These include those providing services such as medical supplies and equipment. The Number of workers is not known yet. No child or forced labour will be involved.

Labour Management Roles and Responsibilities for WHO Project Components

WHO

WHO PMU will be responsible for day-to-day coordination of the Project activities, including:

- Carrying out Project financial management and procurement activities.
- Monitoring and evaluating Project activities and preparing Project progress reports and monitoring and evaluation reports.
- Ensuring compliance with the Environmental and Social Commitment Plan (ESCP) requirements and environmental and social instruments and
- Coordinating with other stakeholders on Project implementation.
- In addition to that, the technical officers within the WHO country office assist the PMU when needed.

WHO Contracted Workers and Primary Supply Workers

The PMU will use the WHO Standard Procurement Documents for solicitations and contracts, and these include labor and occupational, health and safety requirements. WHO Standard Procurement Documents for solicitations and contracts including labor health and safety requirements is consistent with WB requirements.

The tendering process for contractors will require that contractors can demonstrate their labor management and OHS standards, which will be a factor in the assessment processes. Contractual provisions will require that contractors:

- Monitor, keep records and report on terms and conditions related to labor management.
- Provide workers with evidence of all payments made, including benefits and any valid deductions.
- Ensuring there is a health and safety focal point, responsible for monitoring OHS issues.
- Keep records regarding labor conditions and workers engaged under the Project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime).
- Record safety incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.).
- Report evidence that no child labor is involved.
- Training/induction dates, number of trainees, and topics.
- Insurance for workers against occupational hazards, including ability to access medical care and take paid leave if they need.
- Details of any worker grievances including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken. Grievances listed should include those received since the preceding report and those that were unresolved at the time of that report; and
- Sign the Manager's Code of Conduct and/or the Individual Code of Conduct, as applicable.

Monitoring and performance management of contractors will be the responsibility of the PMU. The PMU will be responsible for oversight of labor management provisions as well as contract supervision. The PMU Focal Point will have overall responsibility for data collection, monitoring, and analysis of the LMP as part of the Project's M&E efforts. The PMU Focal Point will monitor the implementation of, and compliance with, this LMP, including management of worker-related grievances. Monitoring reports should be reviewed and submitted regularly to the Manager of the PMU, who will submit them with other monitoring reports to the World Bank.

Contractors will keep records in accordance with specifications set out in this LMP. The PMU may at any time require records to ensure that labor conditions are met and that prevention mechanisms and other safety issues, general to OHS. The PMU will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Contractual non-compliance remedy: The contract with contractors will include non-compliance remedies (i.e., sanction clause) for possible noncompliance with E&S provisions by the contractors, for example, inadequate provision of PPE to workers, forced overtime work.

Reporting on fatalities and serious incidents: The contractors are responsible to report to PMU/WHO (and to WB) in case of fatalities and serious incidents within 48 hours after learning of the incident or accident, once confirmed, and provide an initial report within 15 days of that notification indicating possible root causes and proposing possible corrective actions, as requested by the Association.

Annex C. Code of Conduct

Sample

Code of Conduct

This Code of Conduct sets out minimum standards and applies to all individuals involved in providing services and support to the beneficiaries of UNICEF and WHO implemented projects

1. I will work in the best interest of the beneficiaries of the Project upholding the highest standards of fairness, efficiency, competence, integrity, respect, and transparency in the provision of services and support to them.
2. I will reject bribery and corruption. I will never abuse my position to withhold assistance, nor give preferential treatment, in order to solicit favours, gifts, payments of any kind, or advantage.
3. I commit to providing assistance to the beneficiaries of the Project impartially, to treating all beneficiaries with dignity and respect, and to not abusing my authority or use my power or position in a manner that is offensive, humiliating, embarrassing, or intimidating to another person.
4. I will not discriminate against anyone on the basis of a person's race, colour, gender, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or another status, or any other grounds.
5. I will respect all applicable law and policies. I will never commit any act that could result in threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse to individuals.
6. I will do my best to support and ensure respect for the environment.
7. I will not engage nor accept any form of child labour.

For security personnel ONLY

8. I confirm that I have never been charged of past abuses, inappropriate use of force, or other criminal activity and wrongdoing.
9. I acknowledge that I have no law-enforcement authority and I shall not encroach on the duties, responsibilities, and prerogatives reserved for public security forces whilst conducting any duties at any location involved in this project. While I retain my inherent right to take action necessary to defend myself (and persons and facilities as specified in my contract), I will not engage in offensive operations.
10. My role is limited to preventive and defensive services, protecting workers, facilities, equipment, and operations wherever they are located. In carrying out my duty, I will apply non-violent means before

resorting to the use of force and firearms as far as possible and attempt to de-escalate the situation as soon as practicable. I may use force and firearms only if other means remain ineffective or without any promise of achieving the intended result. I will exhibit high levels of technical and professional proficiency and clearly understand the rules for the proportional use of force.

11. If the use of force is required, I will ensure that this is reasonable, proportional to the threat offered and the minimum required to negate the threat. That the force is necessary, under all the circumstances known at the time, to negate the threat and there is no other reasonable alternative available. If there is a requirement to escalate the situation to meet the threat, I will follow the Use of Force Policy consistent with the applicable laws and that of the organization to which I have been employed.
12. Whenever the lawful use of force and firearms is unavoidable, I will minimize damage and injury, and respect and preserve human life; ensure that assistance and medical aid are rendered to any injured or affected persons at the earliest possible moment; ensure that relatives or close friends of the injured or affected person are notified at the earliest possible moment.

I will maintain strict confidentiality and security of all information about the beneficiaries of the Project. Where there are concerns or suspicions regarding abuse or exploitation, I understand that I must report such concerns immediately via established reporting mechanisms in good faith and cooperate with any investigation that may be required.

I confirm I understand and accept the minimum standards as detailed above.

Name	
Role	
Organization	
Date	
Signature	