



European Bank
for Reconstruction and Development

Guidance note

EBRD Performance Requirement 4: Health, safety and security

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1. Introduction and objectives

1.1. Purpose of this guidance note

The European Bank for Reconstruction and Development (EBRD) is committed to promoting environmentally sound and sustainable development in the full range of its activities, pursuant to the Agreement Establishing the Bank.¹ The Environmental and Social Policy (ESP) is one of the Bank's three good governance policies and a key document that guides this commitment to promoting "environmentally sound and sustainable development" in the full range of its investment and technical cooperation activities.² The EBRD's Board of Directors approved the 2019 ESP and its 10 related Performance Requirements (PRs) on 25 April 2019. They apply to projects started after 1 January 2020.

EBRD Performance Requirement 4 (PR4) on health, safety and security (HS&S) recognises the importance of HS&S risks to workers, project-affected communities and consumers associated with project activities, in accordance with the hierarchy of risk control.³ The implementation of HS&S standards can have positive benefits – such as fewer accidents, reduced worker absences and improved productivity – while failure to implement such standards can have negative impacts – such as financial losses, legal action and reputational risk. The arguments for good HS&S risk management are well established and are financial, legal and moral in nature:

- **Financial** losses can result from clean-up costs associated with damage; financial penalties from regulators; compensation paid to workers and project-affected communities; delay penalties paid to customers; repair costs to equipment and machinery; labour costs due to worker rehabilitation; absenteeism; and loss of production and business opportunity due to poor reputation.
- **Legal** action may be taken by regulators over failure to comply with national HS&S laws. In some countries, this can result in imprisonment or the removal of licences to operate due to injury or illness to workers or project-affected communities, or damage to third-party property or the environment.
- There is a **moral** duty to those affected by activities associated with client operations. It is not acceptable to sacrifice human health for financial gain. Investors expect clients to provide all workers with a safe, healthy and secure workplace⁴ and to manage the health, safety and security risks to project-affected communities.

This guidance note provides the EBRD, its clients, their consultants and stakeholders with practical guidance on interpreting and implementing PR4. For more detail on labour and working conditions, please see Performance Requirement 2.⁵

This guidance note will also help clients to consider the United Nations Sustainable Development Goals in their projects to ensure that the general requirements of PR4 are met. These goals include:

- good health and well-being – to ensure healthy lives and promote well-being for everyone at all ages
- gender equality – to achieve gender equality and empower all women and girls
- decent work and economic growth – to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- industry, innovation and infrastructure – to build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.

1 See EBRD (1990), Article 2.1(vii).

2 See EBRD (2019).

3 See EBRD (2019), p. 23.

4 Clients should consider adopting a "world of work" stance as reflected in International Labour Organization (ILO) Convention C190. See ILO (2019).

5 See EBRD (2019), p. 16.

1.2. Key changes since the 2014 PR4

The updated version of PR4 took effect on 1 January 2020. It aligns largely with the 2014 version of PR4, but includes some significant changes, notably:

- The hierarchy of risk controls has been added to ensure that the method of controlling workplace hazards is implemented in preferred order of priority.
- The term “well-being” has been introduced to ensure the physical, mental and emotional well-being of workers is monitored.
- It introduces the need to identify and assess security threats to workers and project-affected communities, as well as management arrangements to safeguard persons and property from security risks.
- It introduces the need for appropriate financial compensation to be provided to any persons suffering injury or ill health as a result of project activities.
- It introduces the need to identify, assess and adopt specific measures to prevent and address gender-based violence and risks of sexual exploitation, abuse and harassment
- It introduces antimicrobial stewardship to projects involving the use of antibiotics.

1.3. Key objectives of PR4

PR4 sets out the following obligations for EBRD clients:

- protect and promote the HS&S of workers by ensuring safe, healthy and secure working conditions and implementing a management system appropriate to the risks associated with the project⁶
- identify, assess and manage HS&S risks to project-affected communities and consumers during the project lifecycle from both routine and non-routine activities
- consider vulnerability and vulnerable people, including gender differences, as they may be significantly more affected than other groups by a project or development
- recognise the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment, and that violence and harassment can constitute a human rights violation or abuse.

1.4. Terminology: Health, safety and security

This guidance note includes a glossary (Annex 3) that provides definitions of key terms used in PR4 and in this guidance note. The following table provides clarification on the key terms of “health”, “safety” and “security”.

Table 1. Health, safety and security

	Health	Safety	Security
What is it?	A state of complete physical, mental and social well-being, and not merely the absence of disease ⁷	The absence of danger or physical harm to workers and project-affected communities from the hazard created by project activities	Protection of workers, project-affected communities, suppliers, facilities, assets, data and operations from unauthorised access, use or exploitation
What is it meant to control?	Prevent health impact, injuries and illness, and promote overall health and wellbeing	Prevent harm and other non-desirable outcomes	Prevent direct and indirect security threats to operations, property and life
Examples of control (note these are not exhaustive and indicative only)	Provide workers with a baseline medical examination before starting work to ensure that they are fit to undertake work Once employed, offer workers regular check-ups to detect and assess early symptoms such as occupational hearing loss	Avoid working at height (if this cannot be done, prevent falls by using guard rails or mitigate the risk of a fall by using safety harnesses and/or airbags to arrest the fall)	Install CCTV, alarm systems, fencing, lighting, manned security and digital technology to detect and prevent unauthorised access and interference with facilities and assets, data and operations, provide training to security personnel on interaction with community members

⁶ This requirement also covers non-employee workers as stated in the ESP. See EBRD (2019).

⁷ See WHO (1948).

2. Scope of application

2.1. Applicability of PR4

PR4 applies to all projects financed by the EBRD, as established in the Bank's ESP. Clients will, as part of their environmental and social assessment process, identify the relevant requirements of the PR and how they will be addressed and managed throughout the project lifecycle.

The potential risks to workers and project-affected communities may vary according to the stage of the project, be it mobilisation, construction, commissioning, operation, maintenance and decommissioning, closure or reinstatement. In addition, the potential risks can vary depending on the vulnerability of individuals, both in the workplace and in the wider community.

Implementation of the actions necessary to meet the requirements of PR4 is managed as an integral part of the client's overall environmental and social management system (ESMS) and/or the project-specific environmental and social management plan (ESMP), as set out in PR1.⁸

2.2. Non-applicability of PR4

For financial intermediaries, only the occupational safety and health (OSH) sections of PR4 apply. PR9 states that the financial intermediary will designate one or more senior management representatives to have overall responsibility for environmental, health, safety and social matters, including the implementation of PR9, PR2 and the relevant OSH requirements of PR4.⁹

2.3. Scope of PR4

PR4 recognises the importance of managing HS&S risk for workers, project-affected communities and consumers on all EBRD-financed projects.

⁸ See EBRD (2019), p. 13.

⁹ See EBRD (2019), p. 44.

3. Requirements

3.1. General requirements for health and safety management

Health and safety (H&S) spans all industries and professions and requires a multi-disciplinary approach. Due to the many different aspects of H&S, there can be competing and conflicting demands. To balance them, the EBRD recommends that clients adopt a H&S management system that takes a plan-do-check-act (PDCA) approach to H&S management, similar to international standards ISO 45001¹⁰ and ILO-OSH 2001,¹¹ as well as standards such as SA8000.¹² The management system should also take into account the client’s approach to managing the safety of project-affected communities. The PDCA approach achieves a balance between the systemic and behavioural aspects of management and treats H&S management as an integral part of good management overall, rather than as a standalone system.

There are two approaches to managing H&S: compliance based and risk based.

Compliance-based approach

A compliance-based approach looks at national regulations and takes a line-by-line, regulation-by-regulation approach to developing H&S processes and procedures.

Risk-based approach

A risk-based approach focuses on the risks of the tasks to be carried out and undertakes a constant and continuous drive to reduce these risks to as low as reasonably practicable. The PDCA model operates as a continuous improvement cycle, with risk-based thinking at each stage. The key stages of a PDCA cycle are:

The cyclical nature of the PDCA model can help clients continually improve their approach to HS&S, enabling them to identify and control risks, reduce the potential for incidents and continuously improve performance.

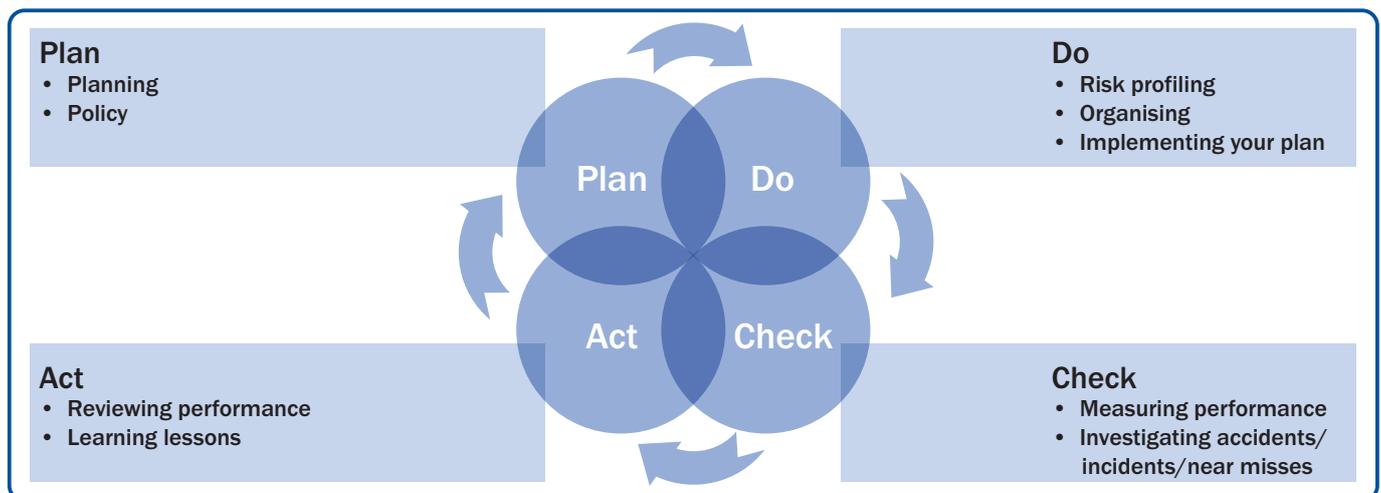
It is important that clients do not dismiss the risk-based approach to managing health and safety and rely solely on a compliance-based approach. Many laws and regulations have been developed over time and can lag when it comes to covering certain emerging technologies and new materials. It is also important to note that it is not possible to regulate all hazards and risks, and that clients will need to acquaint themselves with good international practice (GIP) in managing H&S, which may go beyond their national laws.

Risk management

All workers have a right to work in a safe and healthy work environment, where risks to their health and their safety are controlled with preventative and protective measures and plans are put in place that meet GIP. What is more, project-affected communities and third parties have a right not to be harmed by any activities associated with projects. H&S is not about stopping activities that need to be undertaken, but about carrying out activities in the safest way to prevent injury and ill health.

To manage H&S risks on projects, clients must undertake risk assessments and identify suitable control measures. As discussed in section 1.1, there is a moral duty on clients to ensure that no one is harmed by their activities. The risk assessment process is discussed in further detail in section 3.1.2.

Figure 1. The PDCA model



10 [ISO 45001](#) is the standard for the management of occupational health and safety risks’. See ISO (n.d.a).

11 [ILO-OSH2001](#) is a national framework for occupational health and safety management systems. See ILO (2002).

12 [Social Accountability \(SA\) 8000](#) provides a framework for organisations of all types, in any industry and in any country, to conduct business in a way that is fair and decent for workers and to demonstrate their adherence to the highest social standards, including H&S. See SAI (n.d.).

With detailed information, clear instructions, appropriate training and good levels of supervision, projects can significantly increase awareness of H&S in the workplace. Without this approach, projects may result in low standards and a poor H&S culture – some of the key contributions to workplace accidents. It is, therefore, important that all workers receive the appropriate amount and level of information, instruction, training and supervision at work.

Information

Clients must provide all workers and project-affected communities with appropriate, relevant and comprehensive H&S information on the hazards, risks, emergency arrangements and preventative and protective measures necessary to safeguard their health and safety. This information will be periodically reviewed to ensure it remains valid throughout the project lifecycle. Such information should include:

- details on the hazards that workers, project-affected communities and other third parties are exposed to as a result of the project activities undertaken
- the risks to their health and safety
- the control measures that are necessary to prevent injury and ill-health from occurring.

Information may be from various sources, such as external manufacturer information on the mechanical and physical hazards of equipment or machinery or supplier information on chemical hazards. The information will usually include the consequences of exposure to hazards, factors that might increase risk, and necessary measures to prevent or minimise risk to workers and other external parties, such as project-affected communities and the wider public.

Any information provided needs to be relevant, specific, updated periodically and clear, so that everyone understands what is expected of them.

Clients should consider various methods of delivering and communicating information, as some individuals may require more detailed information to understand the requirements fully. Clients must also consider any likely barriers that might prevent individuals from understanding the information and how to overcome them, such as providing information in different languages and in different formats (for example, visual aids for those who are illiterate).

Accidents and incidents

Hazards exist in all workplaces and more so in projects with a strong community interface, which can present a high-risk environment. Risk is not something that can be removed completely unless the hazard is eliminated completely, which may not always be possible. When residual risks remain, they need to be managed. It is important to note that although these may be residual risks, unplanned events may still occur. Where any events result in injury and ill health, or have high potential for such, clients will be expected to identify what went wrong and how to prevent it from happening again. To this end, a formal procedure is needed to ensure all accidents and incidents are:¹³

- reported at the right level, that is, to a supervisor, senior manager or director
- investigated to establish what happened
- documented or recorded, so that findings can be reviewed and analysed to identify the causes of the accident and incidents
- appropriate remedial measures identified and implemented to prevent recurrence, and
- lessons from accidents and incidents communicated across the client organisation.

All accidents and incidents need to be investigated no matter how minor they seem. An investigation is not about allocating blame, but helping to identify why the existing risk control measures failed and what improvements or additional measures are needed. The depth and scope of the investigation will depend on the severity and consequences. It is important that the right people are involved in the investigation, so the investigating team should include a H&S committee representative. For more technical accidents and incidents, investigations may require external technical expertise (although individuals from within the organisation who have adequate technical competency and were not directly involved in the accident or incident can assist). It is good practice to appoint a senior manager from the organisation to lead or chair the investigation. Depending on national requirements, external agencies may also need to be involved.

13 GBVH incidents will need to be treated with special measures, covered in section 3.1.4.

Accident and incident procedure

An accident and incident investigation and reporting procedure will set out the specific actions clients need to take when an accident or incident occurs. The procedure will provide clear standards to be followed when reporting and investigating all accidents and incidents. These will include:

- roles and responsibilities
- what types of accident and incident need to be reported and investigated
- how and when the investigation will be undertaken
- what the internal and external reporting requirements are
- follow-up and corrective actions.

The accident and incident procedures will take the form of a written document, be reviewed periodically to ensure they remain appropriate to the nature and scale of the operation, and be communicated to all relevant persons.

Identifying causes and preventing recurrence

Accidents and incidents have many causes. By investigating and analysing unplanned events, clients can identify a chain of events that led to the accident or incident. The causes can be categorised as an:

- immediate cause – that resulted in the injury, ill health or property damage
- underlying cause – the unsafe act or condition that led to the accident or incident
- root cause – where the event stemmed from, which can also include organisational factors, such as failure to ensure the correct selection of equipment for a particular task.

To prevent accidents or incidents from happening, clients need to identify immediate, underlying and root causes and adopt risk control measures to prevent accidents and incidents from occurring again.

Clients are required to report all accidents and incidents in line within the financing agreements entered into with the EBRD.

Financial compensation

Clients will ensure appropriate financial compensation is paid to any persons suffering injury or ill-health caused by project activities.

3.1.1. Occupational safety and health

Health and safety is not just about objects and premises; its primary objective is to protect workers. OSH is the process of ensuring the health, safety and welfare of people at work. Clients have a responsibility to keep their workforce healthy and safe at all times while they are at work. They can do this by providing suitable instruction, supervision and training, including induction training.

Instruction

The purpose of H&S instruction is to set out the minimum requirements for any activity and to ensure that these are followed to prevent injury or ill health to anyone. Clients should develop a safe system of work (SSOW) for all activities. The SSOW will define the safe methods of working by detailing each step to ensure that the activity is carried out in a safe way. Only workers who have received instruction and been appropriately trained should undertake a given work activity.

Supervision

All workers must have an appropriate level of supervision to ensure they do not place themselves or others at risk of harm. New or inexperienced workers are particularly at risk when at work and may require a greater level of supervision until they demonstrate that they have a sufficient level of knowledge and experience. It will be the supervisor's responsibility to ensure that all workers, including contractors under their control, understand the risks within the workplace, that control measures have been implemented and that all workplace rules have been followed.

It is not acceptable to rely on a worker to do the job they have been asked to do when they have not been provided with a SSOW, including the correct work equipment and a safe method for carrying out the work. Supervisors are a crucial link to workplace H&S, ensuring work is carried out in a safe way. It is, therefore, important that supervisors have more than significant knowledge and experience; they must also have enhanced knowledge of specific hazards and know how risks will be controlled. They must also have the authority to deal with any H&S concerns. Effective supervision will ensure that workers have the right training, are competent to undertake the work they have been asked to do, and identify H&S problems before they end up causing unplanned events and potential injury and ill health to workers and project-affected communities.

Clients must consider EU Directives on OSH¹⁴ to be the minimum standards they need to apply. However, if the country in which the project is to be undertaken applies higher standards, these take priority. Clients that operate in a country with lower OSH standards than the EU, or with laws that do not cover the particular hazard or risk, must

¹⁴ Information related to the EU Directives on OSH are available at <https://OSHa.europa.eu/en/safety-and-health-legislation/european-directives>.

apply the OSH EU Directives. Where no such Directive exists, GIP should be applied. Clients need to assess the requirements and ensure there is no conflict. Where such cases exist, clients will ensure compliance with the host country to ensure that they do not breach any local laws.

Clients must appoint a competent person to have overall responsibility for OSH for the operation or duration of the project. These individuals should have the skills, knowledge, training, qualifications, experience, seniority, resources and support of management to be able to recognise hazards and identify the necessary controls and means to implement measures to protect workers and others from injury or illness.

Clients will develop a H&S plan (see Annex 1), which should be communicated to all workers, contractors and other third parties engaged to work on project sites or to perform work directly related to the core functions of the project. The H&S plan should follow the PDCA philosophy and contain key details, such as:

- the project, activities and operations to be undertaken
- how the work will be managed and where responsibilities lie, including interfaces with all parties involved, for example, suppliers, contractors, service users, and so on
- what arrangements are in place to identify hazards and control risks throughout the lifecycle of the project, including the development and approval of risk assessments
- worker welfare facilities and first aid provisions
- fire and emergency procedures
- training and competency.

Clients must cascade their H&S plan through their contractors and supply chains, such that the project as a whole meets the EBRD's requirements.

Clients should ensure that there are processes in place for coordinating with their supply chain and contractors and procedures in place for managing contractors to ensure work is being conducted safely and in line with client requirements.

Clients should ensure that they have processes in place for consultation with workers, project-affected communities and third parties (such as the media). They should set out what communication methods will be used and how often information will be communicated. Clients must ensure that, regardless of the methods used, an atmosphere of open communication is encouraged. This should include forums where workers can discuss or raise any concerns.

Clients must ensure that they are aware of and respond to workers', project-affected communities' and third parties' H&S concerns about a project in a timely manner. They should refer to PR10 on information disclosure and

stakeholder engagement.¹⁵ This requires clients to establish an effective and accessible grievance mechanism as early as possible in the project development process to receive and facilitate resolutions of H&S concerns and complaints raised by workers and project-affected communities.

Clients should ensure that any H&S concerns are addressed promptly and effectively in a transparent manner that is culturally appropriate, free from manipulation, interference, coercion, intimidation, repercussions and retribution, and readily accessible to all affected parties at no cost. They must ensure that the mechanism allows for anonymous complaints to be raised and that the process does not prevent access to judicial or administrative remedies.

Clients are required to inform workers, project-affected communities and third parties about the grievance mechanism in the course of its engagement activities and report regularly on its implementation, protecting the privacy of affected individuals. They must ensure that they have a H&S management system, as outlined in section 3.1, that meets the nature, scale and scope of their operations. This may be a standalone system or part of an integrated business management system or ESMS.

Clients should promote a positive safety culture and a system of shared values and beliefs about the importance of H&S in the workplace. This can be done by ensuring that competent people are appointed to undertake project work and that senior management engage and lead health and safety from the top down.

Clients must ensure that workers and affected parties are protected from anything that may cause harm. This includes assessing risks in the workplace and in project-affected communities, and taking action to eliminate or minimise these risks (this is discussed in more detail in section 3.1.2). Clients must also consider adverse effects on the health, safety and wellbeing of workers, taking into account sensitivities such as age, gender, disability or short- or long-term health conditions. Where project activities pose specific risks to workers with such sensitivities, more detailed risk assessments must be carried out and suitable adjustments made to prevent injury and ill health to those individuals.

Clients must ensure that work equipment is suitable for the purpose for which it is intended and that it is safe to use, maintained and inspected on a regular basis. In selecting work equipment, clients must take into account the local environment, working conditions, who will use the equipment and for what purpose. Clients should also take into account ergonomic and gender factors to avoid undue strain on users, ensure that there is adequate space to allow safe access for maintenance and ensure that forms of energy used or produced are isolated and that any moving parts are appropriately guarded, so that they do not expose anyone to the risk of harm.

15 See EBRD (2019), p. 47, paragraph 29.

To ensure the wellbeing of workers, the EBRD requires clients to provide welfare facilities, such as toilets, washing, changing and rest facilities, as well as somewhere to eat and drink during breaks (this is covered in more detail in PR2).¹⁶ Clients should note that sanitary and toilet facilities must never be shared by male and female workers and, where necessary, separate sanitary facilities should be provided for women. Clients must also consider sexual orientation and gender identity and this will need to be reflected in the provision of welfare facilities. The EBRD and the International Finance Corporation (IFC) have issued a guidance note entitled *Workers accommodation: process and standards*,¹⁷ which should be used as a reference tool. It provides practical guidance on the processes and standards that should be applied to the provision of workers' accommodation.

Other wellbeing considerations include planning work shifts so that long working hours are avoided, hours are kept within the limits set by local labour laws and suitable rest periods are provided. Safe means of transport should be provided to and from the work site and processes should be in place to provide assistance to those who may be suffering from poor mental health.

Training

H&S training requirements should be based on the hazards and risks to which workers are exposed while at work and the requirements set out in local and national laws. Risk to external parties must be considered as well. Prior to starting work for the first time, all workers are expected to attend induction training. Clients will maintain records of all H&S training and ensure refresher training is delivered periodically.

Training must be delivered by a competent person and assessed to ensure the worker has retained a satisfactory level of knowledge. All training must be delivered during work hours and funded by the employer. To ensure workers receive the training they need, clients will undertake a training needs analysis. This can be in the form of a training matrix, which clearly indicates the training requirements for specific job roles and the frequency of such training. Clients must ensure that refresher training is carried out routinely, so that workers can maintain a high level of H&S knowledge to carry out their job in a safe, healthy and secure way at all times.

Clients will review the need for any special arrangements for H&S training, taking into consideration part-time, night-shift and seasonal workers, and maintain a training matrix demonstrating what training is required for what roles. Appropriate arrangements will also be made for workers with poor literacy skills or those with disabilities, such as sight or hearing impairment. Clients should also deliver training and have training materials in multiple languages to ensure information can be communicated to all workers.

¹⁶ See EBRD (2019), p. 16.

¹⁷ See IFC and EBRD (2009).

Induction

Induction training must be provided to visitors and third parties attending the workplace, in addition to workers, and should be specific to the workplace. It will include, at a minimum, information on workplace hazards and risks to workers' health and safety, risk control measures, workers' responsibilities and health and safety rules. The induction will also include information about the need to report all accidents, incidents, unsafe acts, unsafe conditions and emergency procedures. In addition, where workers are exposed to specific risks that are not common to all, or carry out high-risk activities, they will be required to attend more detailed and specific training. This could be apply when the worker enters a confined space or operates a specific type of equipment, for example.

H&S committees

Clients will support the establishment of a H&S committee. A H&S committee can be a useful forum for consultation on H&S matters and consists of workers from a variety of roles within an organisation. The activities of a H&S committee may include:

- undertaking workplace inspections and audits to help identify workplace hazards
- participating in the risk assessment process to help evaluate hazards and risks that might cause incidents, injuries and illness
- participating in the development and implementation of H&S programmes to protect the health and the safety of workers
- involvement in any accident investigations to establish the root causes and suggest recommendations to prevent recurrence.

A H&S committee provides an opportunity for employers to meet regularly with worker representatives and work together to develop policies and procedures to improve H&S in the workplace. In some countries, this may be a legal requirement, however, it is good practice to establish a H&S committee when more than 50 workers are employed.

Monitoring

Clients should undertake monitoring on all projects to promptly identify any shortcomings or underlying H&S issues that could result in injury or ill health. They should also request and review contractor monitoring data to ensure that complete H&S performance is captured. Depending on the activities of contractors, these activities could present higher risks to the project (for example, construction work or electrical systems maintenance).

There are two main ways of monitoring H&S performance on projects: “active” and “reactive”.

Active monitoring provides an opportunity to monitor project standards and feedback on performance before a loss-making event or incident occurs. The aim of active monitoring is to measure success and reinforce positive achievement. Examples of active monitoring include:

- workplace inspections and audits
- safety tours and hazard spotting
- benchmarking against other EBRD client projects
- health surveillance
- training delivered
- safety drills.

Reactive monitoring involves the use of historical data and focuses on what has already gone wrong. It aims to give clients an opportunity to learn from their mistakes. Examples of reactive monitoring include the review of:

- accident and ill-health data
- sickness absence
- near-miss/property damage
- court cases, compensation claims, worker and community grievances or fines.

3.1.2. Risk assessments

Risk assessments are essential management tools for maintaining the health and safety of all by identifying hazards and evaluating the risks associated with work activities or work equipment and those exposed to them. Failure to carry out risk assessments means that hazards may not be correctly identified and may increase the risks of injury or ill health. From a financial point of view, this could lead to operational delays, management time spent investigating accidents, financial penalties and compensation claims by those who have suffered a loss.

To identify hazards and evaluate risks, it is important to understand the difference between a **hazard** and a **risk**.

- A **hazard** is something that has inherent potential to cause injury or damage to people’s health. For example a machine may have moving parts that come close to a worker’s hands during operation. These moving parts have no fixed or removable guard. The hazard in this case would be the moving parts of the machinery.
- A **risk** is the likelihood of a hazardous event occurring, combined with the severity of injury or damage to people’s health caused by that event. In the case of the machinery example, if no guard is present, there is a high risk of the worker suffer a crushing injury to their hands.

Risk assessments should be carried out by competent individuals. However, for good practice and depending on the complexity of the activity to be assessed, it is recommended that risk assessments be done in teams, drawing on the knowledge of others who are working on the task or the equipment being assessed.

The EBRD requires clients to ensure risk assessments are carried out on their projects and operations for all activities and workplaces. In addition, clients should ensure that risk assessments are gender sensitive and take into account gender needs, differences and inequalities.

There are five steps to carrying out a risk assessment:

1. Identify the hazards.
2. Decide who might be harmed and how.
3. Evaluate risks and review existing controls or the need for additional controls.
4. Record findings.
5. Review assessment regularly.

These are discussed in further detail below.

Identify the hazards

Identifying hazards is a key part of the risk assessment process. Clients should be aware that hazards include health, safety and security hazards. There are a number of methods that can be used to ensure that hazards are identified, including:

- walking around and looking at what could cause harm
- talking to individuals, both male and female, asking about work and health issues
- looking at manufacturer’s safety data, instructions and operating manuals
- in-country legislation
- professional opinion.

Common classifications of hazards include:

- physical – manual handling, dust, noise, heat, vibration, electricity, and so on
- chemical – chlorine, ammonia, raw materials, additives, fumes, cleaning chemicals, and so on
- biological – blood-borne pathogens, infectious diseases such as coronavirus, tuberculosis, hepatitis, and so on
- psychosocial – excess workload, long hours, stress, bullying, and so on.

Decide who might be harmed

When considering who might be harmed, clients should be looking beyond their workforce and the boundaries of their premises and considering anyone who might come into contact with the hazards created by the operations and activities on and off site. These include:

- young workers, trainees, workers with a disability, female workers, migrant workers or ageing workers
- maintenance and cleaning staff
- contractors
- visitors
- those experiencing short- or long-term health conditions
- neighbours and other businesses
- local communities and members of the public.

Evaluate risks and review existing controls or the need for additional controls

At this stage, each hazard is considered in terms of its potential to cause harm to the above individuals. Once the potential for harm has been decided, any existing controls should be identified by applying the hierarchy of controls (see Figure 1) and evaluated. When evaluating risk, clients should check in-country legislation and ensure that everything required by law has been implemented. For example, EU directive 2003/10/EC¹⁸ states that individual hearing protection should be provided and worn by those exposed when noise levels are above the upper action value of 85 decibels.¹⁹

When evaluating risks, clients should consider vulnerable groups and sensitivities such as age, gender, disability, or those with short- or long-term health conditions.

Young workers will be inexperienced, unaware of hazards and associated risks, and possibly immature, so will be more at risk of being involved in an accident in the workplace. Clients must take this into account when carrying out risk assessments for young workers.

For workers with disabilities, clients should ensure that reasonable adjustments are made in the workplace. A person with impaired hearing, for example, may be unable to hear a fire alarm, but will see flashing lights that go off in conjunction with the alarm. Other issues to consider include mobility and access in the event of an emergency. These individuals may need a nominated person to assist them in the event of an emergency.

Clients should also consider those with short- or long-term health conditions. Risk factors include long periods of sitting/standing, manual handling, fatigue, stress, violence and chemical risks. As part of the risk assessment process, clients should inform workers of the outcome of the risk assessments. They will also need to introduce a process for female workers to notify their supervisor/line manager if they have recently become pregnant or have given birth and if they are breastfeeding, so appropriate adjustments can be made.

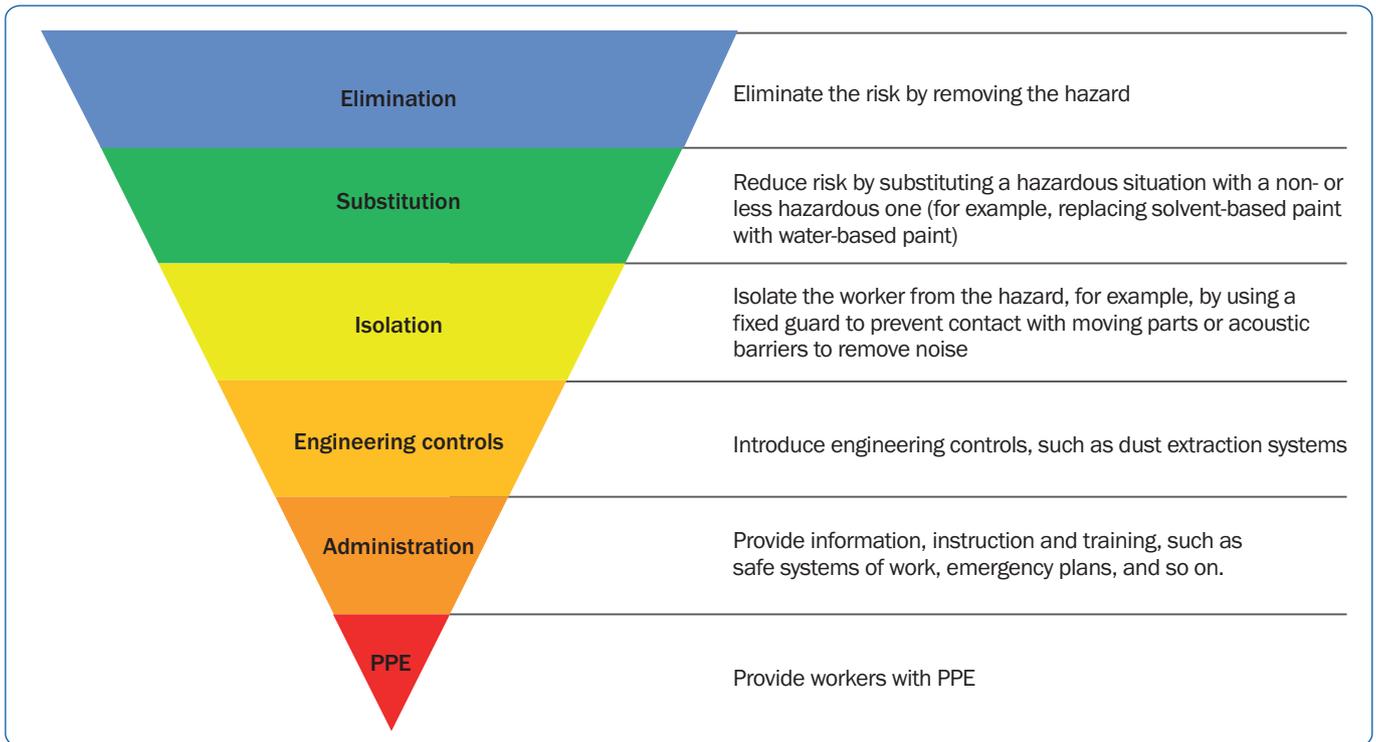
Clients should consider the following factors in their risk assessments: language barriers, the level of literacy of workers, risk perception, a lack of H&S awareness and cultural differences. When employing migrant workers, they should ensure that risk assessments are communicated in a language that can be understood by all workers and that any H&S information, instruction and training is provided similarly.

¹⁸ Directive 2003/10/EC of The European Parliament and of The Council of 6 February 2003 on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (noise)

¹⁹ Risk assessments are to be carried out when noise levels reach 80 decibels. Hearing protection must be provided at 85 decibels. At 87 decibels, workers cannot be exposed (taking into account any reduction in exposure provided by hearing protection).

Where existing controls are not sufficient, the hierarchy of risk control should be applied to ensure that additional control measures can be applied to reduce the risks that have been identified. All identified risks should be reduced as much as reasonably practicable by applying control measures in order of priority as follows:

Figure 2. Hierarchy of risk controls



Once the hierarchy of risk control methods has been applied, a decision has to be made about the level of risk that remains after the control measures have been taken into account and whether this is acceptable or tolerable. This can be as simple as high, medium or low. Alternatively, a matrix can be used to score the likelihood of the event occurring and the likely severity if it does. One method is a 4x4 matrix (see Figure 3). Clients should note that whichever system is used, efforts should be made to minimise gender bias.

Once controls have been put in place, there will still be a level of risk, albeit much reduced. This is known as the residual risk.

If personal protective equipment (PPE) has been identified as a control measure through the risk assessment process, clients should provide all workers with individual PPE. When providing PPE, this must be at no cost to the worker and appropriate to the activities to be undertaken. Training must be provided on its use and limitations.

Figure 3. Typical 4x4 risk matrix

Increasing likelihood	4	8	12	16	Unacceptable – Stop activity and make immediate improvements
	3	6	9	12	Tolerable – Look to improve within a specified timescale
	2	4	6	8	Adequate – Look to improve at next review
	1	2	3	4	Acceptable – No further action, but ensure controls are maintained

NOTE: PPE should ideally be used in conjunction with other control measures, as it only offers individual protection. Collective measures should always be prioritised over individual measures to ensure that multiple workers are protected over an individual.

PPE should be certified and consideration given to the specific physical characteristics of workers (gender, age, disability and health status, physical features, and so on) to ensure that it is appropriate and fits correctly. Clients should also take into consideration gender bias when selecting PPE, as PPE is mainly based on the size and characteristics of a male worker. A unisex approach to PPE selection could lead to significant problems. For example, ill-fitting helmets or fall arrest systems may not provide the protection needed and may cause more risk to the worker. It is important to involve the workforce when selecting PPE and ask their opinion on its suitability. PPE that does not fit correctly or is not favoured by the workforce will often not be used.

Clients should ensure that, when selecting PPE, they choose suppliers that carry a range of sizes for both men and women.

Record findings

The hazards identified and measures put in place to control risks should be documented and communicated to all workers, contractors and other affected parties. A risk assessment is a useful training and awareness tool in educating workers and others on why controls are used and what might happen if controls are not implemented or followed/used correctly.

Review assessment regularly

It is good practice to review risk assessments on a regular basis to ensure that they remain up to date and that control measures are still effective. This is particularly important in construction work due to the continually changing environment and emerging risks. In addition, risk assessments should be reviewed once the following conditions have arisen:

- accident, near miss or ill health
- changes to processes, work methods or materials
- new technology/changes to existing equipment
- changes in legislation
- changes in personnel and gender operating tools and machinery
- feedback from workers who have concerns.

Even if none of the above conditions has arisen, it is good practice to review risk assessments periodically to ensure they are appropriate and based on the level of risk. High-risk environments will require a more frequent review.

General risk assessment principles

When carrying out the risk assessment process, and depending on the activities or workplaces being assessed, clients may also require data-collection or monitoring equipment to inform the risk assessment. Examples include noise and dust assessments to identify any adverse conditions, biological agents, extreme temperatures, vibrations, chemicals (covered later) and fumes.

The risk assessment may subsequently identify the need for health surveillance. If so, this must be provided to all workers, contractors and other affected parties. Health surveillance is a system to establish a baseline at the start of employment and conduct ongoing checks to detect and assess any changes during workers' employment. Health surveillance is important for detecting ill-health effects at an early stage, so action can be taken to prevent deterioration. It also provides data to help evaluate health risks and highlights gaps in workplace control measures.

Carrying out health checks on prospective workers before starting employment also ensures that they are fit to undertake the work they are being employed to do. Existing workers should be encouraged to report pre-existing health issues to better inform the risk assessment and develop better controls. In addition, workers with access to confidential health data must be given training to ensure that they understand their obligations. Clients should consider developing a data protection policy. For more information on data protection, please see PR2.²⁰

NOTE: Clients must not discriminate against any workers who have provided information on pre-existing health issues.

Clients should also consider that, when introducing new control and remedial measures, they may also be creating additional hazards. For example:

- Introducing water suppression near electrical equipment will increase the risk of electrocution.
- Substituting a chemical that removes a health risk may introduce new risks, such as the risk of fire or explosion.
- Eye protection can reduce the risk of eye injuries, but can reduce a worker's vision if environmental conditions cause the eye protection to fog up.

²⁰ See EBRD (2019), p. 16, paragraph 7.

3.1.3. Community health and safety

Clients are responsible for ensuring that their project activities are undertaken in such a way that the impact on project-affected communities is identified, minimised or mitigated and constantly monitored. Clients should carry out risk assessments for all activities to identify the risks to project-affected communities.

A risk assessment will help clients to decide whether there are appropriate control measures in place for project-related community risks. Community-related hazards may exist, for instance, where project activities include working along or above pedestrian routes, project-related road traffic or even the storage of hazardous materials, which, if accidentally released, might have off-site effects.

Risk assessments should follow the process identified in section 3.1.2. Identified project-affected communities should be engaged, consulted and informed of any risks related to the project and control measures that have been put in place to reduce the risk. This is further clarified in PR10, which states:²¹

“For projects that are likely to be associated with adverse environmental and/or social risks and impacts, the client will develop and implement a stakeholder engagement plan or an equivalent documented process, proportionate to the nature and scale of the risks, impacts and development stage of the project.”

As part of the stakeholder engagement plan, it may be necessary to designate an individual (client representative) to liaise with the local community and relevant authorities, including on H&S matters, such as emergency preparedness and response planning (see section 3.2.8) and project-related traffic routing.

Clients should also consider vulnerable groups as part of their risk assessment and any additional measures that may be required. These can be children, the elderly and individuals with impaired mobility. Particular locations, such as schools, hospitals, community centres and other similar areas where large groups gather, should also be taken into account.

Clients should consider the effect the project will have on the local community. Children may be inquisitive, but will lack risk perception, so clients should put measures in place to reduce the likelihood of children exploring project-related sites and being injured. Measures include ensuring that project sites, equipment, buildings and other project-related premises are secure, any excavations are covered, ladders are made safe at the end of the working day, electrical installations are made inaccessible and waste bins are locked.

²¹ See EBRD (2019), p. 47, paragraph 12.

²² See EBRD (2019).

²³ See UNHCR (2022).

Clients should also avoid project-related road traffic passing through local villages and, where practical, divert away from areas such as schools and shopping areas where pedestrians gather. Where this is not possible, a traffic management plan should ensure that other control measures are introduced to manage the risk and that all drivers associated with the project are informed. These measures may include engaging with local road police, other public authorities and community leaders. Control measures to manage the risk may include agreeing traffic routes, restricting the times of road deliveries to less busy periods, monitoring traffic and ensuring priority is given to project-affected communities other road users.

Vulnerable groups are discussed in PR1, PR2, PR4, PR5, PR7, PR8 and PR10.²² When it comes to these particular groups, the EBRD requires its clients to:

- **identify vulnerable groups**, specifically any people who may be disproportionately impacted by the project, based on the result of vulnerability analysis
- **carry out an analysis to determine pertinent vulnerability factors** during the appraisal process and during the conduct of socio-economic surveys, in the context of the project area.

If vulnerable people are identified, clients should then:

- conduct specific consultations with vulnerable groups
- work to avoid physical or economic displacement
- develop and implement differentiated mitigation measures
- take into consideration differentiated exposure to and higher sensitivity of vulnerable groups
- protect vulnerable workers.

3.1.4. Gender-based violence and harassment

The United Nations defines gender-based violence and harassment (GBVH) as harmful acts directed at an individual based on their gender.²³ GBVH is used as an umbrella term to include acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations, including sexual exploitation, abuse and harassment (SEAH). It is rooted in gender inequality, the abuse of power and harmful norms. GBVH disproportionately affects women and girls, but it can also affect men. Individuals of diverse sexual orientation and gender identities are also disproportionately affected. GBVH affects individuals in the workplace and in communities.

All forms of GBVH have a range of negative impacts on the health and wellbeing of individuals and their families. It is important that clients are aware of these impacts and recognise that even forms of GBVH that may initially seem less severe may have a damaging and lasting effect on an individual's physical, mental, sexual or reproductive health.

In 2019, the International Labour Organization (ILO) adopted a new Convention (C190)²⁴ to combat violence and harassment, including GBVH, in the world of work. The Convention recognises that GBVH is a threat to equal opportunity and is incompatible with decent work and sustainable enterprise. C190 calls for GBVH risks to be understood as an occupational health and safety risk.

The EBRD:

- believes that gender equality is a fundamental aspect of a modern, well-functioning market economy and democratic society, and is committed to preventing gender discrimination and to promoting gender equality within its mandate
- requires its clients to identify any potential gender-specific and disproportionate adverse impacts, and develop mitigation measures to reduce these
- requires its clients to adopt measures to effectively prevent and address any form of violence or harassment, including SEAH, gender-based violence, bullying, intimidation and/or exploitation
- requires its clients to identify vulnerable people or groups who may be disproportionately impacted by projects and develop and implement mitigation measures, so that vulnerable people are not disproportionately affected.

GBVH as an OSH risk

In the workplace, individuals can be impacted by sexual harassment and assault. They may also be forced to work in an intimidating, hostile or humiliating environment and experience various unwelcome forms of sexual conduct. Women may be asked for sexual favours, exposed to inappropriate jokes, insinuations and comments, and unwanted physical contact that can amount to assault. More detail on GBVH in the workplace can be found in PR2.²⁵

The responsibility for prohibiting and preventing violence and harassment at work generally lies with the client. However, workers are also required to abstain from committing acts amounting to harassment against their co-workers and project-affected communities. Consequently, clients must, in consultation with workers, set out a workplace policy on violence and harassment that extends to project-affected communities. Once the policy has been developed, clients will need to further develop and implement systems and processes to ensure that the policy is effective.

By integrating this policy into the H&S management system, clients can ensure that the systems and processes developed can be continuously reviewed. Where issues have been identified, these can be rectified.

There are both a compelling business case and strong moral and ethical reasons for addressing GBVH. All forms of GBVH have a range of negative impacts on the health and wellbeing of individuals and their families. GBVH increases accident potential, too, as workers who are experiencing GBVH may be distracted and more likely to cause/be involved in an accident.

It is important that clients are aware of these impacts and recognise that even forms of GBVH that may initially seem less severe may have a damaging and lasting effect on an individual's physical, mental, sexual and reproductive health. GBVH can also have a negative financial impact, which can have a knock-on effect on the project, including:

- unexpected costs arising from litigation
- loss of confidence among investors and partners
- damaged relationships with local communities and service users
- increased staff turnover.

GBVH risk to project-affected communities

GBVH is not restricted to the workplace. Projects with a strong community/user interface can be a GBVH high-risk environment, affecting community members and service users.

GBVH risks tend to be higher on a project where:

- a large new male workforce and/or an influx of workers is required, whose relatively high income may create opportunities for sexual exploitation of people in the local community
- there is a need for temporary, informal and/or migrant workers, who may be cut off from their support networks and be more vulnerable to GBVH and less likely or able to report it
- there is transportation of goods over long distances and overnight through remote communities, where drivers may perpetrate or themselves be vulnerable to GBVH
- security personnel are meant to provide protection, but may abuse their positions of power and status to perpetrate GBVH, particularly where they have access to areas where workers sleep, both onsite and offsite
- worksites are in remote locations, increasing the risks of sexual or physical abuse out of sight of others and where people have limited access to resources to report GBVH and receive support.

Clients must carry out a GBVH risk assessment.

The assessment must be conducted by an individual(s) who understands GBVH, can identify key risks and recommend suitable preventative measures. GBVH risk assessments will enable clients to understand the risk associated with the project and the context in which they are operating.

²⁴ See ILO (2019).

²⁵ See EBRD (2019), p. 16.

Assessing these risks will help clients introduce tailored measures that are more effective. Clients should ensure that the assessment and monitoring of risks is a continuous effort, reassessed with appropriate frequency, as vulnerability to GBVH may increase over time, including when new supply-chain relationships are created.

The EBRD requires the following to be met:

- Clients must adopt measures to effectively prevent and address any form of violence, harassment, including sexual harassment, exploitation and abuse, gender-based violence, bullying, intimidation and/or exploitation.
- Where accommodation is provided, clients must provide this in a manner consistent with the principles of non-discrimination and equal opportunity, including safeguards against sexual harassment and other forms of GBVH.
- Clients must provide an effective grievance mechanism for workers that includes provisions for confidential complaints and those requiring special protection measures, such as reports of gender-based violence.
- Clients must assess project-related risks of sexual harassment, sexual exploitation and abuse to project-affected persons and communities. Where appropriate, clients will adopt specific measures to prevent and address these GBVH risks, including the provision of confidential channels for reporting incidents and providing support.

Clients will also need to develop processes for responding to GBVH reports. These should be led by trained individuals who prioritise the safety and support needs of survivors, witnesses and whistle-blowers.

Clients should avoid acting in an impulsive manner and, instead, take time to understand and respond thoughtfully and effectively, drawing on additional GBVH expertise if needed. Responding poorly or inappropriately to reports of GBVH can undermine client credibility in addressing the issue and cause further harm to those involved.

When GBVH is reported, clients should ensure that the immediate priority is to enable survivors to access the professional support they want/need and to work with survivors, witnesses and whistle-blowers to identify safety measures to protect them from further harm. Clients will need to provide private spaces where support options and potential safety measures can be discussed with survivors (or witnesses and whistle-blowers).

For further information on preventing GBVH, please see: *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector*, a publication by the EBRD, IFC and CDC.²⁶

²⁶ See EBRD, IFC and CDC (2020).

²⁷ See EU (2011).

3.2. Specific requirements for H&S management

3.2.1. Infrastructure, building and equipment design and safety

This section applies to the complete project lifecycle, spanning design, construction, commissioning, operation, maintenance and decommissioning. Clients should not underestimate the impact of protecting the H&S of workers, third parties and project-affected communities associated with any structural elements or project components at the design stage. The elimination or reduction and control of H&S risks in infrastructure, buildings and equipment can be achieved by early engagement and consideration by competent and qualified professionals. Designing out risks before construction and project implementation will require an early review of the project design and appropriate decisions to eliminate and reduce risks. One such example of reducing risk is the use of construction products that are CE marked, which indicates that the product conforms to EU regulations.²⁷ When making any decision, clients will apply the hierarchy of risk controls, as discussed in section 3.1.2, in their risk assessment, with the priority of eliminating or designing out the risk in the first instance.

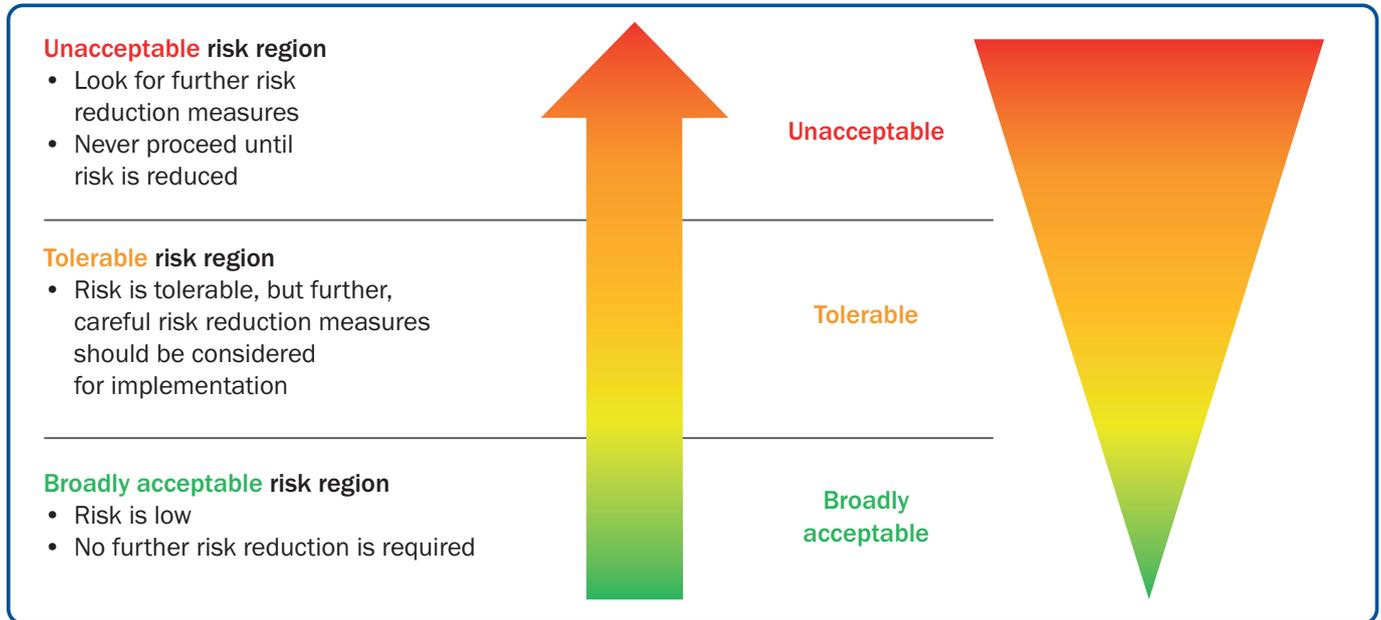
Where structural elements or project components present a high risk to workers and the community in the event of failure or malfunction, clients must engage with third-party specialists with significant experience in the type of structure or project component and give them access to all relevant information, including designs and calculations. The specialists must be appointed as early as possible to ensure that they have input into the design stages and all other corresponding stages through to commissioning.

NOTE: The specialist must be an independent party who has had no prior input into the project.

The depth and degree of risk assessment will depend on the complexity of infrastructure, buildings and equipment and the potential effects on workers and project-affected communities. In some cases, this may require independent experts to undertake one or more internationally recognised techniques to fully identify the hazards and assess the risks. Some common techniques include the following:

- **Quantitative risk assessments** (also known as QRAs) can be applied to fluid flow and/or mass transfer systems that include features that may have severe consequences, such as high-pressure pipelines, storage/importation sites and processing facilities.
- **Hazard and operability studies** (also known as HAZOPs) can be applied to almost any process system involving fluid flow and/or mass transfer, including materials handling, drilling operations, aerospace systems, and so on. Not practical in the early stages of design or for designs with less severe consequences.

Figure 4. Risk must be as low as reasonably practicable



- **Failure modes effect analysis** (also known as FMEA) is typically used to analyse electrical/mechanical systems or pieces of equipment. The methodology should not be used in the early stages of design, for simple designs or where there are only less severe consequences.
- **Fault tree analysis** (also known as FTA) is conducted only when a particular type of accident is of concern and a more thorough understanding of its cause is needed.
- **Event tree analysis** (also known as ETA) is a method for analysing complex processes that have multiple layers of safety systems or emergency procedures to respond to an initiating event.

Clients will undertake the appropriate assessments and reduce risks to as low as reasonably practicable, which will also include the elimination or reduction of human error.

Fire and life safety

Any projects associated with the construction or major refurbishment of public buildings will require a life and fire safety audit by a third-party fire safety expert prior to the building’s opening for public use. Public buildings are those to which members of the public have access, use or transit, for example, railway, metro and bus stations, hotels, shopping malls, libraries, hospitals and schools. Clients should ensure that any construction products used conform to EU regulations, specifically, the Construction Products Regulation,²⁸ which has a number of requirements in the event of a fire, including the following:

- Load-bearing capacity of the construction can be assumed for a specific period of time.

- The generation and spread of fire and smoke within the construction works are limited.
- The spread of fire to neighbouring construction works is limited.
- Occupants can leave the construction works or be rescued by other means.
- The safety of rescue teams is taken into consideration.

All new public buildings must be designed, constructed and operated in full compliance with in-country legislation and GIP. The purpose of the life and fire safety audits is to identify the current arrangements and identify further technical and organisational measures necessary to meet national compliance and GIP. Depending on the type of building, the life and fire safety audit will include, at a minimum:

- fire prevention methods
- means of emergency egress
- fire, smoke or heat detection and warning alarm systems
- compartmentation
- fire suppression and control arrangements
- emergency response plan
- operation and maintenance of arrangements
- roles and responsibilities.

Where areas of non-compliance have been identified in the life and fire safety audit, clients must take action to remedy the situation before opening the building to the public. After opening, clients must ensure that fire drills and fire safety inspections are carried out periodically, so that the organisation’s fire risk management system is appropriate and meets national requirements and GIP.

28 See EU (2011).

3.2.2. Hazardous material safety

Clients are required to protect workers and project-affected communities from potential exposure to hazardous materials. Any substances with the potential to cause harm are hazardous.

Hazardous materials can come in many forms, such as dusts, fibres, fumes and liquids. These materials can cause health issues when they come into contact with skin or eyes, when they are inhaled or ingested. These can range from mild symptoms to serious or fatal illnesses, including cancer.

All hazardous materials must be classified depending on the danger they present. All clients must follow the EU Classification on Labelling and Packaging (CLP) regulation²⁹ to ensure that there is a clear understanding of hazardous materials across borders.

Chemical hazards are usually communicated through single words, such as “toxic”, “corrosive”, “harmful”, and so on, and pictograms on safety data sheets:

Figure 5. Examples of hazard pictograms



Source: UNECE.

The EU CLP regulation requires manufacturers, importers or users of materials or mixtures to classify, label and package their hazardous chemicals appropriately before placing them on the market.

Before clients use any hazardous materials, a risk assessment should be undertaken to identify the risks to workers and project-affected communities. Clients should follow the process identified in section 3.1.2. In all cases, clients should try to eliminate the use of hazardous materials. Where this is not possible, they should consider using a less harmful material. When carrying out a risk assessment, the following factors should be considered:

- material hazards – corrosive, irritant, toxic, and so on
- quantities and concentration of materials
- how work is to be carried out – spraying, brushing, and so on
- routes of entry into the body – inhalation, ingestion, absorption
- risk and safety phrases³⁰ for the material
- worker exposure limits
- duration and frequency of worker exposure
- people at risk, including those who are vulnerable and sensitised
- existing control measures.

Much of the above information can be found on product labels and the manufacturer’s material safety data sheet (MSDS). The MSDS should be made available by the supplier and in the local language and used during the risk assessment process. Information on the occupational exposure limits for hazardous materials can also be found in EU Directive 2019/1831.³¹ Clients should keep a hazardous materials register of all chemicals used on a project.

When carrying out a risk assessment, the hierarchy of risk control should be applied when deciding on suitable control measures. Examples of such measures include:

- eliminating or substituting materials with less hazardous materials, for example, using water-based paints instead of solvent-based paints
- isolating the hazardous substance to prevent exposure, for example, enclosing the process in a booth or fume cabinet
- introducing engineering controls, such as using local exhaust ventilation
- changing the method of activity, for example, brushing instead of spraying
- reducing the time exposed to hazardous materials
- providing workers with information, instruction and training on the hazards, risks and necessary control measures, including the exposure limit values for hazardous materials
- providing workers with respiratory protective equipment/ PPE – this should be considered a last resort and not the only control, as it only protects an individual; collective safety measures should always take precedence over individual safety measures.

²⁹ See EU (2008a).

³⁰ See the World Health Organization’s [List of Risk and Safety Phrases](#).

³¹ See EU (2019).

These risk assessments should also consider the effects that hazardous materials have on both sexes and their susceptibility, namely, the effect of hazardous materials on both men and women, including reproductive organs, pregnancy and menopause.

Clients should ensure that all hazards, risks and the necessary control measures for all hazardous materials being used are communicated to workers. Where risks go beyond the project site, project-affected communities should also be informed and emergency service providers should be consulted. Information on exposure limits, routes of entry and any other information relevant to the hazardous material being used should be communicated. Care should be taken that, when sharing this information, clients do not cause unnecessary panic and that all information is shared in an honest and transparent way to avoid misunderstanding and false perceptions.

Additional training on the use of specific hazardous materials must be provided, along with any special PPE to be used. Clients should also consider the level of supervision required to ensure control measures are correctly implemented and enforced.

Clients must also consider the safe storage of hazardous materials. Hazardous materials should be stored in line with the MSDS within an area that has sufficient space and is well organised, well illuminated and well ventilated, with appropriate signage and labelling. The floor should be impervious to all hazardous materials used and easy to clean. If storing hazardous materials in tanks and containers, consideration needs to be given to capturing any leaks and preventing environmental incidents. Tanks and containers should also be segregated and protected from moving vehicles and mobile plant and equipment.

Clients are expected to maintain a good standard of housekeeping on all project sites. This includes managing, storing and disposing of hazardous waste correctly.

Clients should understand that the transport of hazardous materials by road or rail can create considerable risk to local communities in the event of an accident or incident. When transporting hazardous materials, a specific hazardous classification should be assigned, depending on the predominant hazard. The transport of hazardous materials is regulated internationally by agreements and European Directives. Clients should ensure that hazardous materials are transported in line with GIP. This is discussed in further detail in section 3.2.5.

Controlling exposure to hazardous materials can make workplaces and the local community safer, preventing accidents and incidents that may result in injuries and ill health.

3.2.3. Product safety

Clients who produce or supply products for consumers should ensure that these products are safe through good design and manufacture³² and meet the essential H&S requirements and design standards of all local and national laws. The safety of products should be assessed using the processes identified in sections 3.1.2 and 3.2.1, including the adoption of the hierarchy of risk controls, taking into account the categories of consumer that can be particularly vulnerable to the risk posed by certain products (children, for example).

Clients should liaise with the competent authorities and, where appropriate, other international standards organisations to achieve certification of their products, as this may facilitate compliance with the applicable product safety criteria of the country where the products are to be sold and used. Clients should take into account industry codes of good practice and reasonable consumer expectations as to safety.

Clients must supply consumers with health and safety information, enabling them to be informed of all foreseeable risks of harm to life and health caused by the product. Clients must also put in place market surveillance processes to identify H&S concerns that may arise during the life of the product. They must also develop and implement appropriate procedures for implementing product recalls in such instances and at no cost to the consumer.

Clients should also consider the safe storage, handling and transportation of all products and work alongside distributors and suppliers to ensure that products are stored, handled or transported in accordance with manufacturer instructions and do not impose any adverse H&S effects on project communities, the environment or consumers.

3.2.4. Health and safety risks in community services

The EBRD works with clients from many diverse sectors, delivering projects and services to the community, from hospitals and public transport to local banks. Depending on the scope of the project in question, the right approach needs to be taken to control any risks and impacts the project may have on the community.

Clients should consider implementing a quality management system to ensure that services provided to the public meet expectations and standards set by local and national governments, and that no risk is posed to the H&S of workers or project-affected communities.

Clients are required to identify and control risks to anyone who may access a building, for example, services, users, workers and contractors. This can be achieved by taking appropriate measures in the early stages of planning and design for new-build facilities and should follow the process identified in section 3.2.1. The same process should be followed for facilities undergoing renovation.

32 See EU (2001).

Design and planning

Clients have the ability to influence the design layout of a building in the early project stages, so that it provides access to all users, regardless of physical ability, and ensures provisions for safe evacuation in the event of an emergency. Thus, all buildings should be designed for communal purposes and in accordance with the concept of universal access.

Universal access means safe and inclusive access for people of all ages and abilities in different situations and under various circumstances. Universal access must be considered early in the design of new-build projects and when major refurbishment works are undertaken, taking into account the following seven principles of universal design:

1. Equitable use – the design caters to people with diverse abilities.
2. Flexibility in use – the design accommodates a wide range of individual preferences and abilities.
3. Simple and intuitive use – the design is easy to understand.
4. Perceptible information – the design communicates necessary information effectively to the user.
5. Tolerance for error – the design minimises hazards.
6. Low physical effort – the design can be used comfortably with a minimum of effort.
7. Size and space for approach and use – appropriate size and space are provided, regardless of the user's body size, posture or mobility.

Examples of universal access include:

- step-free level entry to cater for wheelchair users, people with pushchairs, suitcases, people using walking or mobility aids and people who may be visually impaired
- fitting hearing loops for those with hearing impairment
- using automatic doors that slide across rather than open outwards/inwards
- installing counters at different heights.

Wherever possible, activities involving significant risks must be evaluated separately, ensuring that appropriate control measures are in place (following the risk assessment process identified in section 3.1.2.).

Maintenance and operations

Clients should ensure that all operational and maintenance activities undertaken on project-related sites are risk assessed following the process identified in section 3.1.2 and should identify hazards affecting project communities. All hazards, risks and control measures should be shared with all workers. Where any risks could impact project-affected communities, information must also be communicated to these groups, including what actions to take in case of any unplanned events.

Clients should also educate workers and service users, if applicable, about any existing conditions that may affect their H&S. A common example is intrusive works in buildings disturbing hazardous materials, such as those containing asbestos. Exposure to and inhalation of asbestos fibres can have long-term and even fatal health effects. Clients should ensure that procedures are in place for the identification and management of hazardous materials to prevent exposure. They should communicate such arrangements to workers and project-affected communities when they may be exposed to these materials.

Antimicrobial resistance

Projects involving the provision of health services and/or the use of antibiotics are required to incorporate antimicrobial stewardship. The term “antimicrobial stewardship” is defined as “an organizational or healthcare-system-wide approach to promoting and monitoring the sensible use of antimicrobials to preserve their future effectiveness. Antimicrobials are agents used to stop the growth of microorganisms; examples include antibiotics used against bacteria and antifungals used against fungi.”³³

When developing an antimicrobial stewardship programme, clients should consider:

- monitoring and evaluating the prescribing of antimicrobial drugs and how this relates to local resistance patterns
- providing regular feedback to individual prescribers in all care settings with information on the antibiotics being prescribed and in what numbers and presenting this in a format that can be understood by all
- providing prescribers with information on patient safety incidents related to antibiotic use, including hospital admissions for potentially avoidable life-threatening infections or adverse drug reactions
- providing education and training to health and social care practitioners on antimicrobial stewardship and antimicrobial resistance
- integrating it into existing quality improvement programmes and auditing
- developing systems and processes for providing regular updates to prescribers on individual prescribing benchmarks against local and national antimicrobial rates and trends.

33 See EBRD (2019), p. 23, paragraph 29.

To ensure the successful implementation of an antimicrobial stewardship programme, clients should do the following:

- take account of the resources needed to support antimicrobial stewardship across all care settings
- ensure the programme is applied and in operation across all care settings.

When establishing a team, clients should ensure, at a minimum, that its core members include an antimicrobial pharmacist and medical microbiologist.

Clients should encourage prescribers to prescribe antimicrobials only when it is clinically appropriate. They should also consider developing local networks across all care settings to communicate information and share learning on antimicrobial prescribing, resistance and patient safety incidents.

3.2.5. Traffic and road safety

A significant number of traffic collisions are reported around the globe, with an estimated death toll of 1.35 million each year. To address this global road safety issue, international financial institutions such as the EBRD are committed to requiring high levels of road safety on the projects they support. This is in addition to all the other advantages of infrastructure improvements, such as reduced journey times and the broadening of economic benefits.

Evidence shows that having an effective traffic and road-safety management system in place can significantly improve road safety and reduce the casualty rate. This can be achieved by implementing underlying road-safety protocols and procedures and introducing educational measures to raise the awareness of all those involved in project delivery within the project cycle. This holistic approach helps to reduce road-traffic collisions by implementing a sound road-safety culture among those involved in the project, together with good road-safety engineering principles in design and good management of drivers. This can apply to many EBRD projects, including those that interface with roads, such as the railway sector and level crossings.

General principles

To ensure road safety is given a high priority on projects, the EBRD requires clients to develop an effective traffic and road-safety management system to manage project-related traffic and, depending on the project, an appropriate traffic management plan to manage traffic generated by the project. The application of appropriate systems and good management will help to ensure that road-traffic collisions are minimised. This applies to all projects, not just those specifically engaged in logistics or responsible for road networks.

Road-traffic management systems

Road-traffic management systems should follow GIP, such as the ISO39001 Road Traffic Safety Management System (RTSMS). The management system requires workers and supply-chain partners to develop policies and implement procedures to promote, manage and monitor road safety. These arrangements should, at a minimum, identify and evaluate risks to both workers and project-affected communities, in particular, identifying impacts on vulnerable road users, such as pedestrians and cyclists of all age groups, and should include a preventive and corrective approach.

Once implemented, the RTSMS should be reviewed and amended regularly to account for new or increased levels of identified risk. The regular review of procedures not only plays a vital role in determining whether control measures are sufficient, but also identifies gaps in existing processes.

To help clients develop and implement a RTSMS to manage their vehicle fleets and reduce occupational road risks, the EBRD has developed a free resource at: <https://roadrisktoolkit.com>. The toolkit provides freely available downloads and training courses that can support RTSMS arrangements.

Traffic management plans

Traffic management is highly important and often not very well planned or managed. One element that can be added to the H&S management system to help manage this area is a traffic management plan (TMP). A TMP addresses specific road-traffic risks that have arisen due to project-related activities, using a pre-defined set of measures and procedures. Where road-traffic risks are both on and off project sites, the TMP needs to demonstrate how these will be managed.

A typical TMP would consist of the following:

- roles and responsibilities
- stakeholder engagement (outcomes of consultations, a list of concerns raised and recommendations)
- existing environment, mapping of sensitive locations/receptors and predicted traffic impacts
- mitigation measures – how workers and project-affected communities will be protected and what temporary traffic control measures will be in place
- process for the temporary closure or diversion of roads or accesses
- driver management – competency requirements, professional conduct, drug and alcohol policy, training, security vetting
- audit and review
- reporting.

During the design and planning stages, clients should plan work to take into account vehicle access and traffic disruption to project-affected communities. They should further identify alternative traffic routes to minimise the impact on these communities. Other measures to consider include:

- erecting noise barriers
- preventing dust by spraying water on roads
- observing speed limits
- avoiding peak-time traffic and respecting agreed transportation hours and parking areas
- covering aggregated materials carried by project trucks
- employing local traffic wardens to control safe passage near sensitive locations
- ensuring that pedestrians and vehicles are segregated where possible.

The TMP should be communicated to project-affected communities using visual aids where appropriate.

Where projects have significant activities either on or crossing the public highway, the TMP should cover the risks to project-affected communities from traffic movements and identify potential risks to vulnerable groups. Project H&S plans must ensure that hazards, risks and control measures are communicated to all affected communities. Stakeholder engagement should consider the needs of children and vulnerable road users and include engagement with local community leaders, schools and road police. Contact details on project vehicles will allow local communities to raise specific concerns directly and can be used along with broader engagement measures, such as radio and TV spots, to raise awareness of dangers. These approaches can help to provide a closer means of communication between project-affected communities and those involved in the project.

In addition, the TMP is expected to address pedestrian movements (including both workers and the local community). This should be reviewed at least annually, or earlier if there have been any changes to project activities or any reported near misses or collisions. All sensitive locations need to be identified and appropriate control measures put in place. Where applicable, the TMP must demonstrate how traffic and pedestrian movements (both worker and local communities) are segregated and controlled within the workplace, and how safe accessibility is guaranteed for all pedestrians.

It is essential that clients take steps to empower drivers/operators to report safety issues without fear of retribution or punishment and to operate on the explicit understanding that they make an essential contribution to ensuring the safety of the general public and transport systems.

Road infrastructure projects

To maximise safety for all road users, clients must adopt the objectives of Directive 2008/96/EC on Road Infrastructure Safety Management for all road projects. More specifically, the following is required.

Existing roads

For existing roads or roads in operation, a road-safety inspection (road-safety review) must be carried out to identify road safety-related features and prevent the occurrence of road-traffic collisions. The road-safety inspection team will need to:

- review collision data along the road (if available)
- drive along the road at different times of the day/week and under different lighting conditions with qualified personnel to analyse road conditions
- identify road-safety concerns and sensitive receptors³⁵ along the road, such as closely located houses, schools, hospitals, livestock movements, and so on.

Following the completion of the on-site inspection, the team will propose remedial measures for the treatment of any road-safety concerns identified. A cost-benefit analysis may also be conducted to demonstrate the economic return on the investment of implementing the remedial measures against predicted collisions.

Road-safety inspections must also be undertaken periodically to identify the possible impact of roadworks on traffic flows.

New roads

For new roads, a road-safety impact assessment (RSIA)³⁶ and road-safety audits³⁷ will be required.

Road-safety impact assessment

RSIAs are required for infrastructure projects in the initial planning stage of a road project and prior to any approval being granted. The assessment will be an independent, formal approach to examine the likely effects of any proposed road or traffic scheme. It aims to identify the road-safety implications of alternative scenarios, in addition to the option not to proceed.

34 See EU (2008b, amended 2019).

35 The term “receptor” is used to describe features of the biophysical and social environment that may be affected by or interact with the project. These may include, for example, water resources, land, air, habitats, species, communities, individuals and cultural heritage.

36 Ibid, Annex I.

37 Ibid, Annex II.

The assessment will compare the impacts of each proposed road option and determine which would yield the best road-safety outcome. For example, proposing a road realignment may eliminate poor horizontal alignment. It is important that stakeholder consultations be carried out to obtain the views of project-affected communities, including concerns related to accessibility and the safety of vulnerable groups.

Road-safety audits

RSAs must form an integral part of the road design process at various stages of road development, including:

- the design or preliminary design stage
- the detailed design stage
- the pre-opening stage
- the early operation stage.

Depending on the size and complexity of the scheme, additional stages of audit may be added or subtracted. RSAs are a requirement for all new road projects and need to be performed by an appropriately qualified and competent team that is independent of the design team. The team should be led by an experienced road-safety auditor.

On completion of the RSA, an audit report must be prepared, identifying safety-critical design elements and appropriate recommendations to rectify any concerns. The audit report will be shared with the road design team, which will respond to each safety concern to confirm that the recommendation has been accepted. Where recommendations are not accepted, the design team will state the reasons why and detail how the safety risk will be managed.

Roads to be upgraded

Roads being rehabilitated should undergo a road-safety inspection beforehand. As part of the review process, local stakeholders must be engaged and consideration given to vulnerable road users. A road rehabilitation programme may prove a good opportunity to address existing road-safety concerns. A road-safety programme of works may also be completed as part of the rehabilitation programme. This will ensure that existing road-safety concerns are not re-introduced within the rehabilitated road and that appropriate mitigating measures are implemented into the new design instead.

Roads being rehabilitated may also require the completion of road-safety audits at each stage of design and construction. However, if the works result in the implementation of measures that replicate the current situation, without any changes to geometry, junction layout, signs, road markings, and so on, a road-safety audit may not be necessary. Audits are typically only for projects involving the reconstruction or resurfacing of the pavement.

Occupational road safety

Occupational road safety should be established as a corporate agenda item through governance structures and regular reporting that ensures a strong road-safety culture. This is key to ensuring the participation and commitment of workers, contractors and sub-contractors. Senior management should lead on establishing formalised management systems that focus on aspects such as governance, road-safety policy, risk assessment, management procedures and training.

Driver and vehicle selection and management

Clients are required to establish a procedure for driver selection and management. Drivers must be fit to drive and have the necessary national requirements and training. Drivers are also expected to be legally allowed to drive in the countries where the projects operate. These requirements should be periodically checked to ensure continued ability to drive.

Clients must develop a procedure for vehicle selection and management, including vehicle safety requirements, inspections and regular maintenance. For vehicle selection, ratings set by agencies such as the European New Car Assessment Programme should be considered, to ensure that the risk to all road users, especially vulnerable groups, is minimised. This includes conforming to United Nations vehicle regulations, which include good performance in terms of safety for front- and side-impact crashes, electronic stability control, seat-belt anchorages and seat belts, pedestrian protection, motorcycle anti-lock brakes and all recommended requirements for site vehicles.

Formal vehicle inspections and maintenance must be conducted by a competent person and daily inspections should be carried out by drivers. The records of inspections must be kept and made available to the H&S department for collision investigation on request. Inspections and training should include issues such as the safe loading of vehicles and tyre safety.

Clients who have vehicles or fleets of vehicles (owned or leased) should ensure that they undertake suitable risk assessments to manage road and traffic risks in accordance with GIP, such as ISO 39001 RTSMS. They must also ensure that a process is developed for the regular maintenance of all vehicles, implement driver vehicle checks prior to getting into a vehicle, and put a process in place for reporting any vehicle defects.

Clients should establish robust procedures and undertake journey management plans. These can assist in assessing the route that drivers are to take, ensuring risks are reduced to both drivers and other road users. Journey management plans should identify sensitive receptors (such as schools, hospitals and playgrounds) and other potential hazards

that may require control measures to manage risks. The identification of sites such as rest areas along the route are also important, so that drivers can safely break their journey. The process identified in section 3.1.2 should be followed.

Driver training should be provided to both workers and contractors and must be appropriate to the types of vehicle and risks associated with their driving activities. Clients should also consider the use of in-vehicle monitoring systems to help monitor journeys and identify any concerns with driver performance. Where performance issues are identified, clients should act swiftly and take necessary action. This may involve remedial driver training or other disciplinary measures appropriate to the severity of the action in question, for example, repeated speeding or breaches of driving hours.

A process for reporting and investigating traffic collisions or infringements of driving regulations should be developed, and this must guide the employer with the identification of root causes and appropriate remedial or corrective actions. Following an investigation, action plans must be developed to ensure the implementation of all remedial or corrective actions identified.

Driving rules and breaks

Clients are expected to follow European Agreement Concerning the Work of Crews of Vehicles Engaged in International Road Transport (AETR) rules.³⁸ These include rules for drivers, who are not required to drive more than:

- 9 hours in a day, which can be extended to 10 hours twice a week
- 56 hours a week
- 90 hours in any 2 consecutive weeks.

There are also rules on breaks and rests, which include:

- at least 11 hours' rest every day – which can be reduced to 9 hours' rest 3 times between any 2 weekly rest periods
- an unbroken rest period of 45 hours a week – which can be reduced to 24 hours every other week
- a break or breaks totalling at least 45 minutes after no more than 4 hours 30 minutes of driving
- drivers take their weekly rest after 6 consecutive 24-hour periods of working, starting from the end of the last weekly rest period taken.

Clients must also consider driver fatigue, which is a common cause of road crashes and a threat not only to the driver but the wider community. Fatigue can set in easily during long journeys, particularly when drivers are under pressure and take inadequate rest breaks.

38 See EU (1978).

39 See UNECE (2021).

40 Ibid.

Driver fatigue can lead to diminished alertness and concentration and will slow a driver's reaction to oncoming hazards. Slower reaction times can lead to crashes and, in some instances, be life changing.

To minimise driver fatigue, clients should consider preparing a driver fatigue management plan that sets out the requirements and procedures relating to:

- how journeys will be scheduled
- drivers shift patterns
- criteria to establish a driver's fitness to work
- communication of the fatigue management policy to drivers
- in-vehicle monitoring systems to monitor and manage driver hours.

Clients should also consider implementing driving rules to ensure that project-related traffic movements are organised and controlled on the project site, so that vehicles can be driven safely and the risks of collisions minimised. Some examples of site driving rules include:

- introducing site speed limits
- having a one-way system and segregated routes with reversing movements minimised
- regularly inspecting and maintaining roads
- introducing speed humps.

Clients should ensure that drivers are well rested and provided with rest breaks from driving in accordance with the AETR requirements outlined above. A driver's rest break must not result in them working on other tasks during their driving breaks. Procedures should be developed and communicated to all drivers to ensure the risk of fatigue while driving is understood.

The ADR and carriage of dangerous goods by road

Clients should ensure that they follow the Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR)³⁹ and that hazardous materials have been packaged and labelled correctly. Tanks, containers and vehicles need to have placards affixed indicating the consignment type, which must follow United Nations classification. Drivers must have the correct documentation and be trained in emergency response for the hazardous material they are transporting in the event of a containment breach.

Load security is important when transporting dangerous goods. ADR 7.5.7.1⁴⁰ states that packages containing dangerous substances and unpackaged dangerous articles must be secured by suitable means, capable of restraining the goods (such as fastening straps, sliding slat boards, adjustable brackets) in the vehicle or container in a manner that will prevent any movement during carriage that would change the orientation of the packages or cause them to be damaged.

In addition, when dangerous goods are carried with other goods (such as heavy machinery or crates), all goods must be securely fixed or packed in the vehicles or containers so as to prevent the release of dangerous goods.

The movement of packages should also be prevented by filling any voids through the use of dunnage, blocking and/or bracing. Where restraints such as banding or straps are used, these must not be over-tightened so that they cause damage to or deform the package.

Drugs and alcohol

The use of illicit substances and alcohol can seriously impair a driver's judgement. Clients who require workers to drive for work must put in place a drugs and alcohol policy. The policy will set out the organisation's expectations, which must include the need for drivers to declare any prescribed medication that may impair their driving. Clients will also promote random drug and alcohol testing, as well as testing after a vehicle accident or when a driver is suspected of being under the influence of alcohol or drugs. Where random testing is required, clients will undertake testing at various times during the working shift, not only at the start of the working shift.

3.2.6. Natural hazards

Natural hazards are naturally occurring physical phenomena caused either by rapid- or slow-onset events that can be geophysical (earthquakes, landslides, tsunamis and volcanic activity), hydrological (avalanches and floods), climatological (extreme temperatures, drought and wildfires), meteorological (cyclones and storms/wave surges) or biological (disease epidemics and insect/animal plagues).

Natural disasters can create challenges to hazardous installations and to the health, safety and wellness of workers more generally in project areas. Emergency preparedness plays a key role in ensuring the safety of all when natural disasters strike.

Clients should ensure that a suitable and sufficient risk assessment is carried out, along with any further studies or surveys identified in the risk assessment, prior to the start of a project to determine the prevention and/or mitigation measures to avoid and/or minimise risks caused by natural hazards or land-use changes. Clients need to take into account planned operations and activities during normal operations and foreseeable emergency situations that may contribute to or exacerbate natural hazards. An environmental and social impact assessment (ESIA) is one method that can be used to identify a project's potential environmental and social risks and impacts, which may include risks from natural hazards. An ESIA will allow clients to evaluate alternative approaches and specify appropriate mitigation measures. It will also demonstrate to all stakeholders that a systematic process for identifying, evaluating and managing the potential positive and negative impacts of a project is in place.

Extreme weather conditions can contribute to untoward events. Where such conditions may affect operations, clients should liaise with relevant agencies and have access to a reliable source of information to keep up to date on local weather conditions. Clients should communicate any notable updates and prevention and/or mitigation measures to all those affected. They should address both the hazard and the preventative and/or mitigation measures in the risk assessments where there is a history of adverse weather conditions (for example, no tower crane works permitted when there is a wind speed approaching manufacturer safety operating limits). As part of the risk assessment, clients should also identify any equipment needed to deal with adverse weather conditions and ensure adequate supplies of this equipment are available and identified in the emergency plan (see section 3.2.8.).

Where applicable, clients must ensure that additional engineering and administrative controls are in place to control and/or mitigate the risks from identified natural hazards. Temporary work designs should reflect this too, for example, additional control measures for scaffolding to resist movement due to high wind speeds, the use of chin straps when wearing head protection, and so on).

3.2.7. Exposure to disease

Clients are required to prevent or minimise workers' and project-affected communities' exposure to disease. Diseases can be either water based, vector borne or communicable. Transmission of such diseases can either occur directly or indirectly through contact with plants or animal hosts, vectors or the environment. These diseases are typically referred to as infectious or transmissible.

Examples include:

- HIV/AIDS and other sexually transmitted diseases (STDs)
- tuberculosis
- respiratory diseases – including severe acute respiratory syndrome (SARS) associated coronavirus disease
- cholera
- malaria
- zoonotic diseases – such as zoonotic influenza, rabies and bubonic plague.

Clients must risk assess all routes of exposure and factor in vulnerable groups, as exposure and immune response to diseases can vary widely depending on age and gender. Those carrying out these risk assessments must be competent in conducting disease risk assessments and must be familiar with the OSH laws that apply to the workplace and be able to recognise the potential or actual danger of infection and risk of transmission in the workplace.

Once the risks and those at risk are identified, clients, along with the relevant authorities and any other stakeholders, must develop suitable control measures to ensure that risks are minimised. Clients should also consult with government authorities and public bodies to identify what communication measures will be in place, what level of reporting is required and how action will be coordinated in the event of an outbreak.

Suitable control measures to minimise exposure to disease include:

- regular cleaning regimes, ensuring that workplaces are clean and hygienic, and that surface touchpoints, such as tables, telephones, doorknobs, light switches, and so on are wiped regularly with disinfectant
- communicating to workers and visitors the need to wash their hands and the benefits of doing this to reduce transmission, and provide workers with information on proper handwashing
- developing procedures for preparing and handling food
- ensuring processes are in place for the disposal of spoiled food and that this is taken off site and disposed of
- communicating to workers that they should avoid touching wild animals, or coming into contact with any flora/fauna.

Additional information can be found on the EBRD website, with videos on how to work safely, including social distancing,⁴¹ cleaning⁴² and risk assessments.⁴³

The risk of transmission increases when a large influx of workers, either temporary or permanent, enters the community, especially in rural areas where there may be limited exposure to the outside world. Clients must take proactive steps to avoid introducing any new or highly resistant diseases into local communities. Suitable measures include:

- providing suitable housing and welfare areas
- providing training on food hygiene
- providing suitable PPE, such as mosquito nets
- providing education and awareness training to both workers and project-affected communities on common diseases in the country in question and the control measures that have been put in place to reduce transmission.

Clients should also consider pre-screening checks on any incoming workers, as diseases vary from one region to another.

Clients should also develop suitable health surveillance programmes to routinely screen workers' health. This should also include documenting and reporting on any existing diseases workers may have. Clients must not use information obtained in pre-screening to exclude workers from employment.

Where specific diseases are endemic in project-affected communities, clients should identify opportunities in the project lifecycle to improve conditions that could help reduce incidence, both among workers and project-affected communities. Examples include:

- providing suitable welfare facilities and a supply of safe water
- promoting food safety, hygiene, storage and proper nutrition
- discharging wastewater and sewage into the municipal sewer, or storing it on site and having it taken away by an approved waste contractor
- ensuring that the site has good drainage and there are no areas where water can pool
- implementing immunisation programmes and providing essential drugs
- providing healthcare facilities.

Clients should provide workers and project-affected communities with information on endemic diseases, the risks associated with these diseases, the prevention measures that are in place to reduce such risks and any available treatment. Clients should partner with local public health bodies to raise awareness of common diseases and implement educational initiatives for all affected by the project work. This should include:

- providing trained health workers to reach out to communities and give information on immunisation, treatment and good personal hygiene
- implementing an information strategy to reinforce person-to-person counselling
- addressing systemic factors that can influence individual behaviour, as well as promoting individual protection and protecting others from infection, for example, by encouraging condom use to prevent HIV/AIDS and STDs.

Clients should communicate with workers to identify and address any concerns about possible exposure to disease and consult a medical team (ideally a medical team on site, alternatively local public health hospitals or private hospitals) and take action. Any worker who shows signs or symptoms of any communicable disease should receive immediate medical treatment. Any work undertaken by clients will need to follow existing national public health requirements.

41 See EBRD (2020a).

42 See EBRD (2020b).

43 See EBRD (2020c).

3.2.8. Emergency preparedness and response

To ensure the safety of all in the event of an incident, accident or emergency situation, such as a natural disaster, clients are required to formulate an emergency action plan (EAP).

An emergency is an unplanned event, natural or man-made, sudden or progressive, which impacts with such severity that workers and project-affected communities have to respond by taking exceptional measures to prevent danger to life and health. Examples of emergencies include those highlighted in section 3.2.6.

For projects where a risk assessment has identified the presence of major accident risks, such as dangerous substances that exceed certain thresholds, clients must follow the EU Directive on the control of major-accident hazards involving dangerous substances, also known as the Seveso Directive,⁴⁴ to prevent major accidents and limit their consequences for human health and the environment.

Clients should ensure that they assist and cooperate with the relevant authorities and project-affected communities to ensure that there is consensus on how to respond effectively in the event of an emergency situation.

In situations where there is limited or no capacity to respond effectively to an emergency situation, clients must play an active role in preparing for and responding to emergency situations. How they will do this must be communicated to all relevant stakeholders. In such situations, clients will need to provide evidence to demonstrate their capacity to respond to emergency situations. This can be done in the form of an EAP.

Clients are required to take suitable steps to mitigate the effects of workplace emergencies by formulating an EAP that outlines procedures such as hazardous incident reporting and emergency evacuations. They should also prepare a comprehensive emergency management plan that addresses procedures for employee safety, particularly in the event of immediate emergencies. The EAP should:

- take a clear and coherent approach to dealing with workplace emergencies, including operational response actions
- have a basis for coordinated action and indicate what communication methods will be used and who is responsible for coordinating with the relevant authorities, emergency services and the media
- clearly allocate responsibilities
- include training requirements for all workers (including senior managers)
- identify processes and procedures that have been developed to support the EAP

- identify resources in place, such as equipment and facilities, and ensure that there is adequate provision of both
- emphasise the need to carry out routine drills to test the plan.

The EAP should include common references for all departments and authorities that have roles in counter-disaster activity and ensure that communication methods are in place to notify workers and project-affected communities in the event of an emergency. In the event of a power failure, the EAP should identify alternative means of communication to ensure prompt notification.

EAP training

Disaster-related training requirements must also be included and a training plan developed to address firefighting, spill response, confined space rescue, working at height and evacuation. Training needs should be identified based on the roles and responsibilities, capabilities and requirements of workers.

Emergency training should be conducted annually at a minimum, with more frequent training when the response requires specialised equipment, procedures or hazards. The EAP should be updated as required after each exercise. All training activities and the outcomes of training should be recorded, and any elements of the plan subject to significant change (such as contact lists) should be updated.

EAP equipment

Emergency warning systems must be tested at least annually, with fire alarms tested weekly at a minimum. However, clients should also understand and undertake any other testing requirements set out in local regulations or as mandated by equipment manufacturers. In case normal communication methods are inoperable during an emergency situation, clients should establish a backup system, and this should be communicated to off-site resources such as fire departments. This information must be kept up to date, as appropriate.

Clients must ensure that audible alarms, such as fire bells or sirens are installed and operational, with regularly updated call lists displayed throughout the site. Emergency on-site vehicles, if any, should be installed, with vehicle-mounted speakers to communicate the nature of the emergency. The method of protection required must also be communicated (for example, evacuation or quarantine) to the local community and other affected parties.

EAP responsible persons

Depending on the risk profile of the project/operation, clients should appoint an individual responsible for interacting with relevant stakeholders, who will offer guidance to the company on speaking to the media, government and other agencies. If needed, clients can use a third-party company to conduct these services.

44 See EU (2012a).

Clients must ensure that there are sufficient first-aid and medical treatment facilities on site to avoid a burden on local infrastructure in case of emergency, taking into account the number of workers on site and the nature of the work being undertaken. The location of the nearest hospital and its capacity must also be considered, as should the nature of transportation.

Where appropriate, clients should discuss mutual aid agreements with other organizations to enable the sharing of services. This may include sharing emergency-trained workers, the use of emergency equipment or the use of specialised equipment. For example, a business can make use of equipment from a construction company that is operating locally to clear obstructions caused by a natural disaster, such as flooding.

Business continuity and contingency plans should be in place to deal with facility damage, equipment for workers, procedures for evacuation, the performance of emergency functions and the chain of command. Clients should also coordinate with their human resources departments on the notification of next of kin in case of serious accidents or fatalities.

The EAP should identify replacement supplies or facilities to allow business continuity following an emergency. Alternative sources of water, electricity and fuel are commonly sought, for example. Back-ups of critical information are also often held in a secure location to expedite the return to normal operations following an emergency.

A business continuity plan outlines the capability of an organisation to continue the delivery of services at a pre-defined, acceptable level following a disruptive incident.⁴⁵ Clients should develop a training procedure for workers to communicate these items and should update training accordingly following any changes in emergency action plans, preparedness plans, business continuity plans, and so on.

3.2.9. Security

Project security risks may not always be obvious and it is important that clients identify and assess project security threats and put in place appropriate arrangements to prevent risks to workers and project-affected communities. Consideration should also be given to risks associated with supply chains delivering goods. There are two types of security threat – direct and indirect – both of which impact workers and project-affected communities.

45 See ISO (n.d.b).

46 See IFC (2012), paragraph 3.

47 See Voluntary Principles Initiative (n.d.).

48 Ibid.

49 See United Nations (1990).

50 See United Nations (1979).

Direct threats are those that cause physical damage to infrastructure and individuals, examples of which include unstable power supplies, lightning, floods, terrorism, kidnappings, theft, sabotage and arson. Indirect threats are attacks against systems. Common examples include cyberattacks, such as denial-of-service attacks, or hacking systems with the intent to steal company information. Some indirect threats can become physical, such as malicious software designed to exploit or harm programmable devices, leading to critical infrastructure shutting off safety systems, potentially impacting workers and project-affected communities.

Security services

The security of a project depends on various factors, including regional politics, geography, the nature of the project, and so on. To counter such threats, clients must take steps right from the planning stages through to commissioning, operation and decommissioning. In certain countries, the political circumstances may require the use of private security to mitigate security risks. Clients should take steps to ensure that their private security practices respect human rights.⁴⁶ To this end, clients are encouraged to make use of the guidance of various international initiatives⁴⁷ and to take tangible steps to minimise the risk of human rights abuses in communities located near their projects. Clients should also take steps to minimise GBVH where there are security personnel; such personnel are meant to provide protection, but may abuse their position of power and status to perpetrate GBVH, particularly where they have access to areas where workers sleep, both onsite and offsite. See section 3.1.4 to identify what steps clients can take to minimise GBVH.

Clients should consider the following to effectively manage security:

- Use trusted security vetting agencies to run background checks on workers at the time of recruitment.
- If needed, make use of local law enforcement (police or military), or private security if local law enforcement does not exist or is unsuitable, to provide protection to workers and premises.
- If private security forces are used, they should act according to the provisions set out in the guidelines proposed by the Voluntary Principles on Security and Human Rights.⁴⁸

Clients should engage regularly with local communities and government law enforcement agencies (such as the police and/or military) on security issues and practices. Clients are responsible for ensuring that security forces engaged by them act in a manner consistent with the United Nations Principles on the Use of Force and Firearms by Law Enforcement Officials⁴⁹ and the United Nations Code of Conduct for Law Enforcement Officials.⁵⁰ Any use of force also needs to be proportional to the related threat.

Security engagement

Clients must ensure that projects using mobile patrols are given suitable training on how to communicate and engage with local communities and how to prevent conflict and escalation, including when to engage with local law enforcement, as this may exacerbate a tense situation. Clients should ensure that when using mobile patrols, suitable checks are in place to guarantee that the human rights of workers and project-affected communities are respected at all times.

Clients should develop mechanisms for reporting and investigating allegations of improper actions by private security forces hired by them, for reporting alleged abuses by public security forces in their area of operation, and to encourage and monitor the progress of investigations. Clients should ensure they have appropriate mechanisms for reporting such allegations, as well as measures in place to prevent retaliation. They should also formulate a zero-tolerance statement and include it as part of the code of conduct. This should be clearly communicated to workers and contractors (including private security), stating that all allegations raised will be investigated and that any retaliatory acts – including threats, intimidation, harassment or violence against individuals or groups that have raised allegations or concerns – will not be tolerated.

If local or national law enforcement authorities are not active in the project area, clients should use trusted private security agencies that have expertise in dealing with comparable situations. Clients' security management systems (SMSs) must also include a risk assessment, which also considers the safe transport of materials. This should follow the process identified in section 3.1.2.

In addition to addressing the above points, client SMSs should set out how security will be managed throughout the project lifecycle and what resources will be required to ensure it is delivered. The SMS is the company's overarching guidance document on how OSH will be managed and will contain information on what procedures and protocols are in place to manage security. A well-developed SMS will identify roles, responsibilities and risks and provide direction, organisation, integration and continuity. The security section of the SMS should include the following:

- objectives, mission, and approach
- policies and standards
- an overview of the security situation
- physical security, including procedures on the proportional use of force, gender and sexual harassment, de-escalation approaches when engaging with stakeholders and the provision of training
- security operating procedures
- supervision and control
- private security force management
- managing relations with public security
- incident reporting and inquiry
- community engagement, including training on cultural awareness.

For further guidance on security, clients should refer to Annex B of the IFC's *Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts*.⁵¹

Cybersecurity

The use of industrial devices using internet connectivity has increased dramatically over the past few years. This has, unfortunately, resulted in an increase in cyber-criminality and cyberattacks, which have become more frequent, complex and highly coordinated in nature. The use of malicious software, also known as malware, designed to cause harm or exploit any programmable device, service or computer network, has impacted small business and large enterprises alike. Sectors such as manufacturing, transportation and healthcare are increasingly using technology, which is driving the next generation of more efficient, resilient and sustainable industries.

Industrial Internet of Things (IoT) technology aims to maintain operations or improve operational efficiency. However, technology that offers a more efficient way of operating does not necessarily mean it is safer. As with any new technology, clients will need to identify and assess a project's security threats to workers and project-affected communities. Where risks have been identified that may place a person at risk, adequate security management arrangements will need to be made, in accordance with GIP.

Clients should take steps to ensure personal data security. Confidential information on projects and workers can be sensitive, and any breach can be a potential threat to society, as well to the individuals concerned. For a good-practice approach to data security, clients should consider the EU Charter of Fundamental Rights,⁵² which stipulates that EU citizens have the right to protection of their personal data. Other EU legislation clients should consider includes: the Data Protection Law Enforcement Directive⁵³ and the General Data Protection Regulation.⁵⁴ Clients can also use control measures, such as an encrypted data-sharing system with access controls.

To minimise the threat of cyberattacks, clients should ensure that:

- software and systems are kept up to date
- firewalls are installed
- access to critical systems is controlled
- workers regularly change passwords
- endpoint protection is in place.

51 See IFC (2017), [Annex B](#) for guidance on drafting a security management plan.

52 See EU (2012b).

53 See EU (2016a).

54 See EU (2016b).

Annex 1. Health and safety plan

– template outline

This is presented as general guidance and should be adapted to the specificities of the project context.

1. Introduction

- What is the scope of the project? What is the client aiming to achieve with this plan?
- Provide a description of the project and key dates.
- What are the key roles and responsibilities?

2. Local laws, regulations and other compliance requirements

- What health and safety legislation does the client need to abide by in country and under EU law?
- What other requirements – that is, besides EBRD PR4 – also need to be considered?
- How will legal compliance be checked?
- The client should consider compiling a legal register and ensuring that this is checked periodically to take into account any new or upcoming legislation.

3. Communication

- What internal and external communication channels will be used, how will information be communicated and in what language?
- Internal – H&S committees, H&S weekly meetings, monthly H&S reports, notice boards, and so on.
- External – emergency responders, local communities, press, local and national government officials, and so on.

4. Hazard identification and risk control

- How are hazards to be identified? Who will be responsible for this?
- Hierarchy of control to be used.
- Hazards are to be prioritised by their magnitude (high, medium, low).
- Suitable control measures are to be documented.
- How will this be communicated to workers and how will the client document this?
- How often will they be reviewed?
- Make clear that hazard identification and subsequent risk assessment will be an ongoing process throughout the life of the project. How are contractor risk assessments to be managed?
- Develop a stop-work process.

5. Objectives and targets

- What H&S objectives and targets have been set for this project?
- How will they be presented and measured?
- Develop a process to ensure actions are completed and a process for when they go over the target date.

6. Health and safety management

- The client should develop a management system.
- What welfare facilities will be provided?
- How will well-being be managed, including shifts and rest periods?
- What activities will be undertaken on site? How will these be carried out safely? What arrangements will be in place?
- How will information and instructions be communicated and what are the supervision and training requirements?
- How will the client coordinate with the supply chain and contractors?
- How will consultation with workers and other stakeholder be carried out?
- How will work equipment be selected?
- Stakeholder engagement – how will this be done and who will be responsible?
- Overview of the security situation.
- How will security be managed and what level of vetting will take place?
- What level of security supervision will be required?
- Cybersecurity – what measures will be taken to prevent data theft and ensure the protection of confidential information?

7. Operational control – design

- Process for appointment of coordinators to manage H&S on site.
- Process for appointing suitably qualified and experienced personnel.
- Third-party contractor engagement in high-risk areas.
- Development of construction phase plan.
- Life and fire safety audits – when and how will these be carried out?
- What is the client's approach to universal access?

8. Operational control – construction

- What are the site rules, for example, with regard to speed, reversing vehicles, and so on?
- What plans are in place for access to site and access to key areas within the site? What site security measures will be in place?
- Who will carry out site inductions?
- Identify activities on site that require a permit to work (PTW). Develop a PTW system. How will this be communicated to key workers?
- How will contractors and sub-contractors be managed? How will key H&S information be communicated?
- How will hazardous material be managed on site? Where will material safety data sheets be stored? How will these be communicated to workers?
- Develop a traffic management plan and a journey management plan.
- Develop emergency and evacuation procedures. How often will drills be held?
- Develop an emergency plan for a range of scenarios, indicating key responsible persons and contact numbers. How will this information be communicated to key workers?

9. Hazardous material management

- The client will follow EU classification labelling.
- How will hazards be depicted – through signal words or pictograms?
- Who will carry out risk assessments? When will they be carried out? How will information be communicated to workers?
- PPE requirements – where should workers go to request PPE?
- Where will MSDSs be stored?
- Who is responsible for housekeeping?
- Hazardous materials, handling, storage transport and disposal – how will this be carried out?

10. Monitoring

- What leading and lagging indicators will be measured?
- How will this information be reported and to whom?
- How will incidents be investigated?
- Who be responsible for this?
- Will lessons learned be shared? Who will they be shared with? How will this be done?

11. GBVH

- The client code of conduct and policy – how will this be communicated to workers and project-affected communities?
- What grievance mechanisms and investigation procedures are in place?
- What training requirement will the client have for all workers?
- Contractor and supplier buy-in.

Annex 2. Common health and safety hazards, risks and control measures

This list is presented as general guidance and can assist in the preparation of a risk assessment and deciding on appropriate control measures to manage the risks.

Hazards	Risks
Working at height	Falls from height
Hazardous materials (chemical, biological, and so on)	Inhalation, ingestion and/or dermal contact resulting in acute and chronic health conditions
Asbestos-containing materials	Inhalation of asbestos fibres resulting in lung diseases
Vehicle movement	Traffic collisions with pedestrians, other vehicles or stationary objects
Poor equipment and vehicle maintenance	Accidents due to failure, breakdown or unplanned events with equipment and vehicles
Uneven ground conditions	Slips, trips and falls
Entering and working in confined spaces	Lack of oxygen and exposure to toxic and flammable gases causing asphyxiation, poisoning and flash fires
Working in close proximity to free-flowing solids (sand, gravel, grain, and so on)	Falls and submergence in materials resulting in asphyxiation
Exposure to noise	Temporary or permanent noise-induced hearing loss
Exposure to vibration while using equipment	Permanent numbness of fingers and muscle weakness/hand-arm vibration syndrome
Exposure to dust (silica, wood, cement)	Inhalation and reduced lung function and chronic respiratory diseases
Manual handling objects	Musculoskeletal disorders and hand injuries
Lifting and loading operations	Loss of load
Excavations and trenches	Collapse of ground conditions, undermining and collapse of nearby structures and exposure to unhealthy atmospheres
Fire	Burns and inhalation of toxic fumes and gases
Electrical equipment (including work equipment overhead, below ground)	Contact with live electrical conductors resulting in electrocutions, burns, fires and explosions
Earth-moving equipment and trucks	Ground movement resulting in rollovers and uncontrolled movement
Worker fatigue	Slower reactions, reduced ability to process information causing memory lapses, reduced awareness and lack of attention
Lone working	Exposure to violence and harassment and, in the event of sudden illness, unable to reach emergency support or first aid
Working above or close to water	Falling into water and unable to reach a place of safety
Pressure vessels and pipework	Failure of vessels resulting in disruption and fragmentation of the vessel; secondary risks can include corrosive burns, flash fires or inhalation of toxic gas depending on vessel or pipework contents
Work demands/excessive work pressures	Psychosocial risks and work-related stress, resulting in poor mental health
Hot and cold temperatures/surfaces	Burns and permanent dermal damage and scarring
Sharp objects (knives, and so on)	Cuts, abrasions, puncture injuries, dermatitis, amputations and infected wounds
Handling food	Ingestion of contaminated food, resulting in acute poisoning or long-term diseases
Flammable or toxic gases (methane, H ₂ S, CO ₂ , and so on)	Ignition and explosion, displacement of oxygen and inhalation of poisonous gases
Blocked or locked access and egress	Slips, trips and falls and unable to reach a place of safety in the event of an emergency
Flicker and poor lighting conditions	Misjudgement of position, shape or speed of objects

Hazards	Risks
Children and members of the public	Interference, exposure to hazardous activities and unsafe conditions
Blasting (explosives, and so on)	Noise, dust, projectiles and flying rock, premature detonation and overcharging of shot holes
Rail movements	Struck by approaching trains, resulting in serious trauma injuries (crushing, amputation, and so on)
Extreme weather/heavy snowfall, and so on.	High winds resulting in flying objects, high rainfall resulting in unstable ground conditions, heavy snowfall causing excessive weight on roof areas and potential collapse
Worker fitness	More vulnerable to certain working tasks, resulting in asthma attacks or anaphylactic shock from exposure to certain materials, cardiac arrest from excessive physical activity, and so on
Harassment, bullying and violence of workers	Physical and physiological injuries and poor mental health
Hot works (welding, grinding, chipping, and so on)	Ignition of flammable liquids, vapours or gases, combustible materials, dusts, and so on, causing fires and explosions
Radiation	Acute conditions, such as sickness and burns, and chronic health effects, such as cancers and cardiovascular disease
Demolition	Unintended collapse of load-bearing structures
Falling objects	Head injuries

Note: This is not an exhaustive list.

Annex 3. Definitions

Active monitoring	The ongoing activities that check that hazard and risk preventive and protective measures, as well as the arrangements to implement the OSH management system, conform to defined criteria.
Client	A country, company, operation, firm, undertaking, establishment, enterprise, institution or association, or part of it, be it incorporated or not, public or private, that carries its own purpose and administration.
Competent person	Someone with a combination of training, skills, experience and knowledge who has the ability to apply this to perform a task safely.
Contractor	A person or organization providing services to an employer at the client worksite in accordance with agreed specifications, terms and conditions.
Good international practice	The exercise of professional skill, diligence, prudence and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise will be that the project employs the most appropriate techniques and standards in the project-specific circumstances.
Hazard	The inherent potential to cause injury or damage to people's health.
Project	The set of works, goods, services and/or business activities set out in the financing agreements, for which EBRD financing is sought by a client, and as approved by the Board of Directors or, if the Board of Directors has delegated approval authority, by Bank Management.
Project-affected communities	Any people or communities located in the geographical proximity of the project who are subject to actual or potential direct risks and/or adverse impacts related to the construction, operation or demolition of the project.
Reactive monitoring	Checks that failures in the hazard and risk prevention and protection control measures and the OSH management system, as demonstrated by the occurrence of injuries, ill health, diseases and incidents, are identified and acted upon.
Risk	A combination of the likelihood of an occurrence of a hazardous event and the severity of injury or damage to the health of people caused by this event.
Risk assessment	The process of evaluating the risks to safety and health arising from hazards at work.
Vulnerable people	People or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views or social status. Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations, such as people living below the poverty line, the landless, single-headed households, natural resource-dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.
Workers	Those who undertake any work on a client project, including those directly employed by the client, contractors and sub-contractors.
Workplace	Any premises or part of a premises made available to any person as a place of work, including the common parts of shared buildings. This includes any activity involving vehicles used in a workplace.

Annex 4. Acronyms

ADR	European Agreement Concerning the International Carriage of Dangerous Goods by Road
AETR	European Agreement Concerning the Work of Crews of Vehicles Engaged in International Road Transport Rules
CLP	Classification on Labelling and Packaging
EAP	Emergency action plan
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and social impact assessment
ESMP	Environmental and social management plan
ESMS	Environmental and social management system
ESP	Environmental and Social Policy
EU	European Union
GBVH	Gender-based violence and harassment
GIP	Good international practice
H&S	Health and safety
HS&S	Health, safety and security
IFC	International Finance Corporation
ILO	International Labour Organisation
IoT	Internet of Things
MSDS	Material safety data sheet
OSH	Occupational safety and health
PDCA	Plan do check act
PPE	Personal protective equipment
PR	Performance Requirement
RSA	Road safety audit
RTSMS	Road traffic safety management system
SARS	Severe acute respiratory syndrome
SEAH	Sexual exploitation, abuse and harassment
SMS	Safety management system
SSOW	Safe systems of work
STD	Sexually transmitted disease
TMP	Traffic management plan
UNHCR	United Nations High Commissioner for Refugees

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1551 Guidance note – EBRD Performance Requirement 4: Health, safety and security

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