

UNICARIBE Inclusive Higher Education – DOMINICAN REPUBLIC

Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final Product /Deliverable	Expected Completion Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System (ESMS)	<ol style="list-style-type: none"> 1. Prepare a specific, detailed and final ESMS for its operations that includes: (i) an environmental and social (E&S) and occupational health and safety (OHS) policy; (ii) internal procedures to identify, assess and manage the possible environmental, social, labor and OHS risks and impacts associated with each of the Project's activities; (iii) internal procedures to ensure compliance with the Environmental Management and Adaptation Plan (EMAP); (iv) an organization chart including role definitions and duty allocations for the ESMS's implementation; (v) emergency preparedness and response protocols; (vi) stakeholders involvement plans or methods; (vii) a grievance handling and external communications mechanism; (viii) information disclosure, decision making, and community education protocols; (ix) ESMS evaluation and continuous improvement protocols; and (xi) regular audits and inspections of environmental, social, labor, and OHS requirements. 2. Implement the specific ESMS. 	<ol style="list-style-type: none"> 1. Copy of UNICARIBE's specific, detailed and final ESMS. 2. Proof of ESMS implementation. 	<ol style="list-style-type: none"> 1. 180 days after signing the loan agreement. 2. With each E&S Compliance Report.
1.2	Environmental, social, and occupational health and safety policy	<ol style="list-style-type: none"> 1. Prepare a comprehensive E&S and OHS policy. 2. Implement the comprehensive E&S and OHS policy. 3. Create a mechanism to assess and communicate continuous improvements on the implementation of the comprehensive policy. 	<ol style="list-style-type: none"> 1. Copy of the Policy. 2. Proof of ESMS implementation. 3. Mechanism to assess and communicate continuous 	<ol style="list-style-type: none"> 1. 90 days after signing the loan agreement. 2. With each E&S Compliance Report. 3. 90 days after signing the loan agreement.

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			improvements on the implementation of the comprehensive policy.	
1.3	Identification of Risks and Impacts	1. Prepare and maintain an updated matrix of environmental, social and OHS risks and impacts (direct, indirect and synergistic) for each new facility and each Project phase.	1. Copy of the updated matrix for each new facility and each Project phase.	1. 15 days prior to the start of the construction phase of each new facility or prior to the second disbursement, whichever comes first.
1.4	Environmental Management and Adaptation Plan (EMAP)	<p>1. Prepare a specific EMAP for the construction phase of each new facility, that includes: (i) an impact management program for the physical, biological, and visual environment, with proper mitigation measures; management measures for hazardous and non-hazardous solid waste; monitoring activities for polluting gas emissions; control measures for dust and noise generation; and control measures for liquid effluents, both domestic and runoff, and (ii) a program to manage socioeconomic impacts, which includes safety measures for communities located near the facilities; training on environmental, social and OHS issues for construction workers and managers; communication measures for inter-institutional coordination; and measures to guarantee safe and hygienic sanitary conditions for workers during the construction phase.</p> <p>2. Copy of the EMAP specific to each new facility's construction phase.</p>	<p>1. Copy of the EMAP specific to each new facility's construction phase.</p> <p>2. Proof of EMAP implementation.</p>	<p>1. 15 days prior to the start of each new facility's construction phase or prior to the second disbursement, whichever comes first.</p> <p>2. With each E&S Compliance Report.</p>

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		3. Prepare an EMAP for the operation and maintenance (O&M) phase of each of the Project's new and operating buildings or sites, including the following programs: (i) a Comprehensive Solid and Liquid Waste Management Program, which emphasizes measures to store and dispose of waste that cannot be reduced, reused or recycled, and (ii) an Occupational Health and Safety Management Program that ensures a safe and healthy work environment, which considers the inherent risks of the sector, hazards in the work areas (physical, chemical and biological) and specific threats to women.	3. Copy of the EMAP specific to the O&M phase for each of the Project's new and operating buildings or sites .	3. 180 days after the signing of the loan agreement for the operating facilities and 15 days prior to the start of the operation phase of the new facilities.
		4. Implement the EMAP of the O&M phase for each of the Project's buildings or sites.	4. Proof of EMAP implementation.	4. With each E&S Compliance Report.
1.5	Organizational Capacity	1. Appoint a person responsible for environmental and social issues; define roles, responsibilities and powers to implement the ESMS and ensure adequate human and financial resources as part of the ESMS.	1. Copy of the contract or the administrative procedure whereby such person is appointed.	1. Prior to First Disbursement.
		2. Prepare an introductory training program for all personnel responsible for managing each operating or future facility.	2. Copy of the training program.	2. 120 days after signing the loan agreement.
		3. Conduct a refresher training program for all personnel responsible for managing each operating or future facility.	3. Proof of implementation.	3. At least once a year after the introductory training program.
1.7	Emergency Preparedness and Response	1. Prepare a Specific Emergency response Plan (ERP) for the Monte Plata Campus that will focus on the following issues: (i) emergency response procedures; (ii) a detailed list of qualified emergency response teams; (iii) emergency contacts, and communication systems and protocols; (iv) interaction procedures with local and regional authorities	1. Copy of the emergency response plan for the Monte Plata Campus.	1. 15 days prior to the start of the Monte Plata Campus' operation phase.

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		on health issues and emergency resolution; (v) permanent facilities and equipment for emergency response (e.g., first aid stations, hoses, fire extinguishers, sprinkler systems); (vi) protocols for pumps, ambulances and other emergency services and vehicles; (vii) evacuation routes and meeting points; (viii) training exercises, (simulations and drills) involving UNICARIBE staff and other stakeholders and potentially affected parties.		
		2. Implement the ERP of the new Monte Plata Campus.	2. Proof of ERP implementation.	2. With each E&S Compliance Report.
		3. For each EPR, develop; i) an annual training program; ii) a root cause analysis procedure for each serious accident or fatality; and iii) as well as a description of the corrective actions needed to minimize the risk of new occurrences.	3. Copy of each ERP.	3. 90 days after signing the loan agreement for the facilities in operation.
1.7	Crisis management	1. Prepare a crisis management policy that establishes governance standards to guarantee an adequate response to emergencies.	1. Copy of UNICARIBE's crisis management policy	1. 90 days after signing the loan agreement.
1.8	Monitoring and assessment indicators	1. Prepare and maintain a compliance matrix of permits, licenses and certifications required to operate for each site or Campus, including (i) key performance indicators (KPIs); (ii) defining the competent authority in charge of issuing the permits or licenses; (iii) date of issuance or entry into force of each permit or license; (iv) person responsible for monitoring or enforcing each permit; and (v) procedures for future compliance and communication.	1. Updated compliance matrix, for each Headquarters or Campus.	1. 120 days after signing the loan agreement.
1.9	Project's Regulatory Compliance	1. Prepare, by means of an internal or external audit, an annual consolidated report on the state of compliance with applicable environmental and social policies and measures, and OHS, including (i) the progress of ESMS actions regarding identified KPIs; and (ii) the state of	1. Environmental and Social (E&S) Compliance Report.	1. Annually over the life of the loan.

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		compliance with IDB Invest's Environmental and Social Sustainability Policy.		
1.10	Stakeholder Engagement	1. Develop a Stakeholder Management Plan, which will include (i) map of the most relevant stakeholders, including local authorities, neighbors and nearby communities (within a 500 m radius of each facility); (ii) differentiated measures that allow for the effective participation of the most vulnerable or dispossessed groups; (iii) a mechanism that guarantees the community representatives effectively portray the opinions of the affected communities; (iv) details of how information will be disseminated to stakeholders; (v) details of the stakeholder participation process and how communities will be able to access the grievance mechanism; and (vi) procedures for regular reporting on the Institution's environmental and social performance to stakeholders and the general public, and (vii) mechanisms to implement and disseminate the updated procedure to all staff as part of a training program.	1. Copy of the Stakeholder Management Plan.	1. 120 days after signing the loan agreement.
		2. Implement the Stakeholder Management Plan.	2. Proof of implementation.	2. With each E&S Compliance Report.
		3. As part of the Stakeholder Management Plan, prepare a Community Relations Engagement Procedure that establishes effective strategies to communicate and maintain harmonious relationships with the people in the Project's area of influence and that defines the protocols for the following activities (i) interviews with the authorities and stakeholders' representatives; (ii) briefings with social actors; and (iii) handling of social media and networks.	3. Copy of the Community Relations Engagement Procedure.	3. 120 days after signing the loan agreement.
		4. Implement the Community Relations Engagement Procedure.	4. Proof of implementation.	4. With each E&S Compliance Report.

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		5. Appoint the team responsible for the implementation of the Community Relations Engagement Procedure.	5. Copy of the contracts or appointments of the personnel that will make up the team.	5. 120 days after signing the loan agreement.
1.11	External Grievance Mechanism	1. Prepare an External Grievance Mechanism for clients, communities and stakeholders that includes details on how to record, investigate, evaluate, follow up and close grievances.	1. Copies of the External Grievance Mechanism.	1. 90 days after signing the loan agreement.
		2. Implement an External Grievance Mechanism.	2. Proof of the mechanism's implementation.	2. With each E&S Compliance Report.
PS 2: Labor and Working Conditions				
2.1	Internal Grievance Mechanism	1. Adapt UNICARIBE's Internal Grievance Mechanism so that it is culturally appropriate and readily accessible at all times, whereby grievances or queries can be received and processed anonymously.	1. Copies of UNICARIBE's Internal Grievance Mechanism.	1. 90 days after signing the loan agreement.
		2. Implement the UNICARIBE's Internal Grievance Mechanism	2. Proof of implementation.	2. With each E&S Compliance Report.
2.2	Occupational Health and Safety	1. Prepare and implement an Occupational Health and Safety Management Policy to guarantee the health and safety of employees, contractors and suppliers.	1. Copy of the Occupational Health and Safety Management Policy and proof of its implementation.	1. 120 days after signing the loan agreement.
		2. Develop a Workplace Health and Safety Program (WHSP) for each new or operating Site or Campus, which will include (i) the identification of possible risks to the occupational health and safety of workers in accordance with the work they perform; (ii) a risk assessment, risk map and intervention plan; (iii) details of the prevention	2. Copy of UNICARIBE's WHSP.	2. For facilities in operation, 120 days after the signing of the loan agreement or prior to the second

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		and protection measures implemented; (iv) worker training; (v) safety briefing sessions for visitors and occupational health and safety training for employees; (vi) specific training for workers and emergency brigades; (vii) mandatory medical examinations; (viii) procedures for statistical evaluation and reporting of occupational accidents and diseases; (ix) a procedure and mechanism to notify response agencies in case of fatalities or serious accidents; and (x) a procedure to analyze the root cause of the accident and a mechanism to ensure the implementation of corrective actions to avoid future accidents.		disbursement, whichever happens first. For new facilities, 30 days prior to the start of operations.
		3. Implement the Occupational Health and Safety program	3. Proof of implementation.	3. With each E&S Compliance Report.
2.3	Notification and Analysis Mechanism to determine the root causes of fatalities	1. As part of the WHSP, prepare a procedure to notify emergency response agencies, local authorities and IDB Invest about fatalities or serious accidents	1. Copy of the procedure and mechanism.	1. 90 days after signing the loan agreement.
		2. Implement a procedure to analyze the root causes of accidents and suggest corrective actions to prevent accidents.	2. Copy of the procedure's root cause analysis.	2. 90 days after signing the loan agreement.
2.4	Accident follow-up	1. Include an accident monitoring procedure within the ESMS and evaluate statistics related to (i) accident rates, considering all incidents that produce loss of work and (ii) the nature and severity of each accident or incident, determined by the number of days lost in relation to the number of accidents and days lost.	1. Copy of the accident monitoring procedure within the ESMS.	1. 90 days after signing the loan agreement.
2.5	Monitoring, prevention and control of COVID-19	1. Develop and implement a COVID-19 Workplace Monitoring, Prevention and Control Plan that establishes guidelines for monitoring, preventing and controlling workplace health during the COVID-19 pandemic and returning to work; and ensures the sustainability of the	1. Copy of UNICARIBE's COVID-19 Workplace Monitoring, Prevention and	1. 90 days after signing the loan agreement.

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		monitoring, prevention and control measures adopted to prevent the transmissibility of COVID-19.	Control Plan and proof of its implementation.	
2.6	Workers Engaged by Third Parties	1. Prepare a Policy for Hiring and Rendering of Services by Outsourced Personnel that allows UNICARIBE to: i) ensure that the workers hired by its contractors belong to legally incorporated companies that have adequate environmental and social management systems compatible with the requirements of PS-2; ii) establish policies and procedures to manage and follow up on the performance of third-party employers; and iii) ensure that the workers hired by third parties have access to the grievance handling mechanism, either through the Contractor or the Institution.	1. Copy of UNICARIBE's Policy for Hiring and Rendering of Services by Outsourced Personnel.	1. 60 days after signing the loan agreement.
		2. Prepare and implement a Recruitment Policy Training Program for all UNICARIBE personnel who hire outsourced services.	2. Copy of the Recruitment Policy Training Program and proof of its implementation.	2. 60 days after signing the loan agreement.
2.7	Supply Chain	1. Prepare and implement a Supplier Selection Procedure that includes the following (i) a questionnaire, to determine if suppliers comply with (a) labor and OHS legislation in force, in particular the prohibition of child and forced labor, non-discrimination, gender equity, and ensuring safe working conditions, and (b) enforceable environmental legislation; and (ii) a provision that blocks current or potential suppliers that do not comply with labor and OHS laws or environmental regulations.	1. Copy of UNICARIBE's Supplier Selection Procedure and proof of its implementation.	1. 120 days after signing the loan agreement.
PS 3: Natural Resource Efficiency and Pollution Prevention				
3.1	Water Consumption	1. Prepare a Water Consumption Awareness and Reduction Program for all facilities in their O&M phase.	1. Copy of UNICARIBE's Water Consumption	1. 120 days after signing the loan agreement.

No.	Reference	Measure	Final Product /Deliverable	Expected Completion Date
			Awareness and Reduction Program.	
		2. Implement the Water Consumption Awareness and Reduction Program for all facilities in their O&M phase.	2. Copies of proof of implementation.	2. With each E&S Compliance Report.
3.2	Energy efficiency	1. Prepare and implement an Energy Efficiency Program to: (i) identify fuel- and electricity-saving measures; (ii) analyze the use of alternative or renewable energy sources; and (iii) analyze and implement comprehensive energy saving measures.	1. Copy of UNICARIBE's Energy Efficiency Program.	1. 120 days after signing the loan agreement.
		2. Implement the Energy Efficiency Program for all facilities in the O&M phase.	2. Copies of proof of implementation.	2. With each E&S Compliance Report.
3.4	Solid Waste Pollution Prevention	1. Establish and implement a Solid Waste Management Program that (i) fosters an initiative and education campaign on reduction, reuse and recycling for all staff and guests, and (ii) classifies and registers its solid waste as: organic (waste from kitchens and cafeterias produced by damaged products being discarded), recyclable (cardboard, paper, plastics, wood, metals, etc.), and non-recyclable.	1. Copy of UNICARIBE's Solid Waste Management Program.	1. 120 days after signing the loan agreement.
		2. Implement the Solid Waste Management Program.	2. Copies of proof of implementation.	2. With each E&S Compliance Report.
3.5	Hazardous Waste Management	1. Prepare a Hazardous Waste Management Work Manual in order to identify, monitor, minimize, value and comprehensively manage the hazardous waste generated at each facility, fostering a proper waste disposal culture.	1. Copy of the UNICARIBE's Hazardous Waste Management Work Manual.	1. 120 days after signing the loan agreement.
		2. Implement the Hazardous Waste Management Work Manual.	2. Copies of proof of implementation.	2. With each E&S Compliance Report.
		3. Prepare a Standard for the Safe Storage of Hazardous Materials that: (i) contains compliance checklists for each hazardous substance according to its characteristics; (ii)	3. Copy of UNICARIBE's Standard for the	3. 120 days after signing the loan agreement.

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		complies with the country's safety rules, regulations and procedures; and (iii) produces auditable reports.	Safe Storage of Hazardous Materials.	
		4. Implement the Standard for the Safe Storage of Hazardous Materials.	4. Copies of proof of implementation.	4. With each E&S Compliance Report.
PS 4: Community Health, Safety and Security				
4.1	Fire Protection Systems	1. For each new facility, submit a certification issued by a competent professional stating that the design of the Life & Fire Safety (L&FS) System: (i) satisfies IFC's environmental, health and safety guidelines and (ii) is designed in accordance with the international L&FS System code and the laws of the Dominican Republic.	1. Copy of the certification for new installations.	1. 15 days prior to the start of each new facility's construction phase.
		2. For each new facility about to start operations, submit a certification from a competent professional stating that the buildings and facilities: (i) were constructed according to the approved L&FS System design and (ii) all L&FS System devices were installed according to the design and tested according to international requirements.	2. Copy of the certification for new facilities about to start operations.	2. 30 days prior to the start of the operation phase.
		3. For each operating facility, develop a Certification Program that contains a schedule for obtaining a certification issued by a competent L&FS System professional.	3. Copy of the certification program.	3. 120 days after signing the loan agreement.
		4. According to the Certification Program, for each facility in operation, obtain a certification issued by a competent professional stating that the buildings and facilities: (i) were constructed in accordance with the approved L&FS System design; and (ii) contain all L&FS System devices required in the tested designs.	4. Copy of the certification for the existing facilities in operation, according to the implementation program.	4. With each E&S Compliance Report.
4.2	Road Safety	1. Develop a Road Safety Management Plan specific to each Site and Project development stage, including measures to mitigate potential traffic impacts on affected communities.	1. Copy of the Road Safety Management Plan, for each Site and	1. 120 days after signing the loan agreement.

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			Project Development stage	
4.3	External Security Policy and Protocols	1. In the agreements to be signed with the security companies, include clauses that allow UNICARIBE to: (i) carry out reasonable investigations to ensure that the security personnel do not have criminal records and that they have not been involved in cases of abuse; (ii) check the details of the necessary training in the use of force; (iii) check the restrictions on the use of firearms; and (iv) check details on environmental awareness training.	1. Copy of the signed agreement with the security company(ies).	1. 90 days after signing the loan agreement.
PS 8: Cultural Heritage				
8.1	Cultural Heritage	1. Prepare a Chance Find Procedure.	1. Copy of the Chance Find Procedure.	1. 15 days prior to the start of each new facility's construction phase.