

Environmental and Social Review Summary (ESRS) Texila American Expansion Project – Guyana

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1. General Information of the Project and Overview of Scope of IDB Invest’s Review

Texila American University Guyana (“TAU”, the “University”, the “Company” or the “Client”) is a private university and has an affiliate campus in Zambia, along with operations offices and marketing affiliates in over twenty (20) countries. The University offers higher education programs to meet international standards at the undergraduate, postgraduate, and doctoral levels. Courses cover Medicine, Nursing, Pharmacy, Allied Sciences, Management, and Information and Communication Technology (“ICT”). TAU offers a portfolio of twenty (20) courses to students from more than forty (40) countries. Over the years, there has been a continuous increase in the number of students particularly from the Caribbean. The Client, therefore, plans to build and operate a hostel for students and accommodation facilities for staff (the “Project”).

The Environmental and Social Due Diligence (“ESDD”) included: i) a site visit; ii) virtual meetings with the Client; and iii) the review of the Company’s environmental management system, certifications, policies and procedures on environmental health and safety, waste management, emergency response, gender, ethics, and human resources.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation according to IDB Invest’s Environmental and Social Sustainability Policy since it will likely generate, among others, impacts primarily associated with construction activities, such as: i) solid and liquid waste generation; ii) construction noise; iii) air and dust emissions; iv) occupational health and safety impacts including those linked to gender; and v) traffic and access disturbance. These impacts are deemed to be of medium intensity, are generally limited to the Project site (located in a commercial area with active ongoing development), largely reversible, and can be mitigated via measures that are readily available and feasible to implement in the context of the operation.

The Performance Standards (“PS”) triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; and iv) PS4: Community Health, Safety, and Security.

3. Environmental and Social Context

3.1 General characteristics of the Project's site

The Project and planned expansion are in the community of Providence (location for the TAU campus) and spread across two (2) sites. Providence is approximately 6.2 miles (10 km) south of the capital, Georgetown in the East-Bank Demerara area (Region 4). The area is currently experiencing high levels of residential, industrial, and commercial development. The TAU campus is situated close to a call center¹ and a new Hyatt Place Hotel².

The hostel student accommodation ("Site 1") is planned within the TAU campus boundaries occupying 2 hectares (5 acres) on a vacant parcel (0.7 hectares or 1.8 acres) to the rear of the property. It is wholly owned by the Client. The hostel will accommodate both male and female students. Construction duration will be between 18 to 24 months, and the three (3) story building will comprise of eighty (80) two-bedroom apartments, and thirty (30) studio apartments.³

The three (3) story staff apartment ("Site 2") is planned at the Elline Ville⁴ housing development which sits on 60.7 hectares (150 acres) of land. It is approximately 2 kilometers (1.2 miles) away from the University on a parcel (approximately 0.27 hectares or 0.67 acres) which they purchased from the Government of Guyana. It will consist of five (5) three-bedroom apartments, twelve (12) two-bedroom apartments, and fifteen (15) one-bedroom apartments. The parcel is situated between other residences in various stages of construction.

Both sites are characterized by secondary vegetation typical of the Georgetown and surrounding areas, with medium to low-lying shrubbery comprised of commonly occurring plant species.

Given the hydrology, drainage canals, and proximity of some areas to the Demerara River within the coastal lowland zone, flooding is common in sections during periods of high rainfall.

3.2 Contextual risks

Despite its continuous increase since 1990 and Guyana's high-rate economic growth driven by a growing oil production sector, per capita income remains among the lowest in the English-speaking Caribbean. Between 2012 and 2016, the country rapidly transitioned from low-income to upper-middle income. However, economic growth has not translated into changes in overall human development. Despite sparse data, the country is classified as one with very high levels of social and economic inequality. Sharp differences in living standards between the coastal plain and the hinterlands are visible as anecdotal evidence underscores marked differences in income distribution among the various ethnic groups. Since 2000, homicide rates have doubled and the national reported robbery and burglary rates both significantly exceed global averages. The issue of crime and insecurity is particularly important for the private sector as firms in Guyana report crime as a major impediment to their performance.⁵

¹ Qualfon Guyana – Business Process Outsourcing "BPO" service provider

² 125 rooms – under active construction and slated for completion in 2024.

³ These will be constructed in 2 phases (female block phase 1; male block phase 2)

⁴ <https://elaineville.com/features>

⁵ IDB Group Country Strategy with The Cooperative Republic of Guyana 2017–2021, October 2017

Electricity tariffs are among the highest in the region with Guyanese companies reporting high energy costs as a major obstacle. Rising rentals and availability of affordable housing are also concerns due to current oil and gas boom.

The education sector is characterized by a mix of public and private institutions at all levels (primary, secondary, and tertiary). The government is responsible for most of the educational provision. Primary school enrollment rates are high, with almost universal access. However, challenges remain in terms of quality and equity, particularly in rural areas and among disadvantaged groups⁶. At the tertiary level, there are several universities, including the University of Guyana, which is the only public option. Notwithstanding, higher education participation rates in the country are relatively low with an underlying challenge being a lack of qualified teachers. At the tertiary level, the country lags with a 12.9% enrolment rate compared to 38.1% in the region.⁷

Additionally, more than half of Guyanese firms identify an ‘inadequately educated workforce’ as a major constraint to their performance.⁸

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks

The University does not yet have an Environmental and Social Management System (“ESMS”) or other project-specific management tools to guide business activities in the assessment and management of environmental and social (“E&S”) risks and impacts. However, in accordance with local⁹ and international requirements for the operation of a tertiary-level institution and medical training facility, it has several certifications.¹⁰

The public water company responsible for Region 4 (Guyana Water Incorporated – “GWI”), conducts water quality monitoring to ensure standards for potability are maintained.¹¹ The Client also has a Risk Management Committee which ensures integrity and compliance with legal, regulatory, and ethical obligations, as well as the prioritization and management of risk.

4.1.a E&S Assessment and Management System

Even though the University is accredited by several international organizations¹², captures some elements of an ESMS and is recognized by the Ministry of Education in Guyana and the Medical Council of Guyana, it does not yet have such system in place. Therefore, the Client will therefore develop a formal ESMS to incorporate the necessary E&S elements.

⁶ World Bank data

⁷ IDB Group Country Strategy with The Cooperative Republic of Guyana 2017–2021, October 2017; UNESCO 2015.

⁸ Guyana Country Development Challenges (CDC), December 2016

⁹ via the Ministry of Education

¹⁰ National accreditation certificate: Registration number RTL-0022-00--11

¹¹ Water Quality Report ID: GWI-REC-Cust-23/07/004

¹² including the Caribbean Accreditation Authority for Education in Medicine (CAAM-HP), the Accreditation Commission on Colleges of Medicine (ACCM), International Accreditation Organization (IAO), and the Accreditation Service for International Schools, Colleges, and Universities (ASIC)

4.1.b Policy

The University has an Environmental and Sustainability Policy in accordance with its *mission, vision, and values* which outlines a commitment to i) maintain long-term financial viability, adopt environmentally and socially acceptable practices across every aspect of its activities; and ii) preserve and, when possible, enhance the ecosystem. The policy applies to all TAU members, including those who work on campus, conduct activities there, or use the University's resources, as well as its affiliated organizations. Matters relating to University development and related policies are addressed through its By-Laws.

4.1.c Identification of Risks and Impacts

E&S risk management is currently carried out through two (2) channels: i) the University Risk Assessment and Management Committee ("URMC"), responsible for ensuring that TAU and its controlled entities comply with its environmental regulations, and championing the adoption of sustainable practices across all areas of operations; and ii) the Building and Estate Committee ("BEC") which advises, establishes and promotes systems, programs, and initiatives that support the E&S sustainability policy while meeting regulatory requirements.¹³

The Project is required to apply to the Guyanese Environment and Protection Agency ("EPA"), Neighborhood Democratic Council¹⁴ ("NDC") and Ministry of Housing and Water for approval to commence works. This approval is pending. A permit is also required from the EPA which will outline requirements to manage E&S risks and impacts for the construction at both sites.

As part of its ESMS, the Client will detail these channels, and outline and maintain a process for identifying E&S risks and impacts (linked to both its operations and any current or anticipated expansion activities, and consistent with local requirements). This will include an impact identification matrix.

4.1.c.i Direct and indirect impacts and risks

Alongside daily operations, construction activity at both project sites may potentially generate the following site-specific impacts and risks: i) waste generation; ii) noise emissions; iii) air and dust emissions; iv) occupational health and safety impacts including those linked to gender; and v) traffic disturbance, among others. Indirect impacts may potentially include disruption of campus activities during periods of construction or other infrastructural upgrades, alongside temporary access restriction to neighboring households of the Elline Ville housing development.

Prior to the commencement of civil works, TAU will i) submit technical reports; and ii) prepare a construction management plan ("CMP") along with the implementation of any other local permit requirements.

¹³ It also advises and informs departments on their legal responsibilities for environmental management including general environmental responsibilities and the requirement to report environmental harm; and monitors environmental regulatory duties and reporting to the URMC on problems of noncompliance or concern, with recommendations to correct any irregularities.

¹⁴ A Neighborhood Democratic Council covers a small geographic area within each region in Guyana and is tasked with responsibility for the management and administration of these areas within its boundaries.

4.1.c.ii Analysis of alternatives

The proposed interventions will be carried out within the existing boundaries of the University (Site 1), and in an area designated for development (Site 2). Therefore, no alternative assessment was carried out.

4.1.c.iii Cumulative impact analysis

The rapid cumulative impacts assessment considers the incremental effect of past projects already included in the baseline of the environmental components considered in the environmental analysis performed for the Project. There are several projects in execution in the Project's area of influence that could generate some material incremental impacts to those generated by the proposed works. These will occur if construction activities overlap during the course of the day, and may exacerbate impacts associated with construction waste, noise, traffic, and dust. Such cumulative impacts can be adequately managed through the implementation of the CMP.

4.1.c.iv Gender risks

The socio-economic profile of Guyana highlights the vulnerabilities of both men and women. However, women are more at risk because of their lower social and economic status, lower rates of participation in the labor force, higher rates of unemployment, and lower wages, as well as their increased responsibilities for domestic work and care of children, the sick, the elderly, and the disabled. The rate of poverty is higher among women, and since approximately 28% of households are headed by females, these families are at even greater risk. Reports indicate that Amerindian women in rural areas are even more vulnerable than Afro or Indo-Guyanese women. Overall, the country does not have frequent and comprehensive labor or household surveys.

While female labor force participation has increased, it is still well below regional averages and women still have much lower participation rates than men. Additionally, women's employment is more concentrated in sectors with lower earning potential with 60.8% of women employed in the service sector, compared to only 41.8 % of men – this includes lower participation in agricultural and extractive industries, which are the largest sources of employment and profits in Guyana. Women also have low participation as top managers, representing 17.7 % in the country, which is slightly lower than the regional average of 21.1%.¹⁵

As it relates to education, just as in other Caribbean countries, girls and women have higher rates of attendance at educational institutions than boys and men. In addition, girls tend to achieve better examination results linked as well to the relatively high percentage of female-headed households. However, the result is mixed as it relates to health, education, and other social indicators in terms of their likely impacts on employment for women and men. On one hand, high levels of life expectancy and education appear to offer advantages for women; on the other, levels of adolescent fertility and female led households may make it difficult for women to balance caring and professional aspects of their work.

¹⁵ Guyana Country Development Challenges (CDC), December 2016

Violence against women and girls is widespread driven by an intersection of cultural, economic, social, and political factors. Although the country's comprehensive legislative environment protects their rights, women and girls continue to suffer high rates of sexual and other forms of victimization. Persistent and endemic sociocultural norms and enduring inequalities have given rise to an aberrantly high prevalence of intimate partner violence ("IPV"). Guyanese women experience IPV at significantly higher rates than the global average of 1 in 3 women. The country is further noted as a source and destination country for human trafficking, which affects men, women, and children (with indigenous girls representing most cases considering prostitution or domestic servitude). Implementation of the Sexual Offences Act and the National Domestic Violence Policy¹⁶ has remained very slow and few women seek formal services after a sexual assault. There is a relatively high tolerance for domestic violence and corporal punishment of children.

Reports indicate that there is a stark and significant difference between economic and emotional violence experienced by educational attainment – women who have attained education beyond the secondary level reported half the economic violence¹⁷ as those who have only attained primary education or less, and 9 % less than those who have attained secondary education.¹⁸

4.1.c.v Gender Programs

A total of 2,633 students (1843 female and 790 male) are enrolled at the University. The majority attend the College of Medicine (337 female and 208 male). There are more females than males reflected throughout all programs.¹⁹ It is expected that about 5% of the workforce will be women (Safety officer, Supervisor, Dispatcher, and Admin Assistant). Flexible work schedules are available to all employees, regardless of gender.

Gender programs are managed through the Human Resource ("HR") Department with matters regarding gender-related risks and impacts treated seriously. Gender considerations are incorporated throughout several policies including the Safeguarding Policy, and the Faculty, Staff and Student handbooks which outline codes of conduct, and prohibited behaviors such as harassment (including sexual) based on gender. The handbooks guarantee that everyone, regardless of gender identity or expression, has equal access to University programs, activities, facilities, and opportunities. In particular, the Safety Policy and Employee Code of Conduct outlines prohibited practices such as sexual harassment, abuse, exploitation, violence (e.g., verbal and psychological abuse, physical and sexual assault, property destruction, threats to harm a person or property, and property destruction). This is considered unlawful, and all reports are thoroughly investigated. Confirmed reports, are grounds for dismissal.

The policies further uphold people's freedom to express their gender identity including treatment in accordance with their self-identified gender (e.g., pronouns, and preferred name). There are also explicit steps for reporting instances of harassment, discrimination, or other issues pertaining to

¹⁶ 2008-2013

¹⁷ <https://www.unwomen.org/en/what-we-do/ending-violence-against-women/fags/types-of-violence>

¹⁸ <https://caribbean.unwomen.org/sites/default/files/Field%20Office%20Caribbean/Attachments/Publications/2019/Guyana-Womens-Health-and-Life-experiences-Survey-Report-2019.pdf>

¹⁹ Other face to face programs includes College of Business Management (46 female; 15 male); College of Information Technology (3 female; 3 male); College of Public Health (12 female; 1 male) – Total 398 female; 227 male. For online programs (total 918 female; 441male) the majority are in Bachelor of Business Administration with 323 female; 125 male.

gender, as well as the actions to deal with and settle such problems. For people who encounter harassment or discrimination based on their gender, TAU can offer resources and support services (e.g., counseling, legal support, and introductions to pertinent organizations).

Grievance committees have been set up whereby employees can raise concerns on gender inequality, and multiple surveys (including employee satisfaction) are carried out throughout the year which can be used as an avenue to raise gender related concerns.

the University also has a Suicide Awareness and Prevention Policy to promote and protect the wellness of medical students which is aimed at managing suicide risk and prevention.

4.1.c.vi Climate change exposure

Georgetown lies on the Atlantic coast of Guyana at the mouth of the Demerara River. Due to its location, it is subject to a range of climate-related hazards, including coastal storms and extreme rainfall. There are two rainy seasons (May to mid-August, and December to January), with frequent flooding experienced during these periods. The country's drainage network around the coastal plain forms a series of larger primary channels fed by secondary channels that pump and sluice drain flood waters to the sea. However, in many cases, the drainage capacity is unable to accommodate daily rainfall events that exceed a 25-year return period. Several drainage canals associated with this network traverse the boundaries of the respective project sites with coastal and inland flooding identified as the highest priority hazard.

Sea level rise ("SLR") presents a significant threat to the country given its extensive low-lying coastal zone and the concentration of socio-economic activities within this area. According to SLR models, Guyana is forecast to be one of the most affected countries in the Latin America and the Caribbean ("LAC") region, with some scenarios anticipating as much as 60 miles of coastline lost by 2050. Vulnerability scenarios for the coastal zone indicate that SLR overtime will lead to inundation of coastal areas, saline intrusion into surface and ground water sources, and overtopping of existing sea defenses. The country also experiences impacts from droughts and rising temperatures which is evident in specific social sectors such as human health, and water resources

Infrastructure providing critical socioeconomic services such as health care, education and emergency response are largely located within Georgetown itself and the immediate surroundings. Replacement cost for critical infrastructure such as education due to disruption and repair is projected at US\$1,594,255²⁰, and the expected annual damage from flooding across Georgetown and its surrounding areas is around US\$5 million.²¹

Given this exposure profile to natural hazards, the Project is classified as moderate related to physical climate-related hazards. As such, the Client will ensure project designs include adequate mitigation and adaptation measures to offset potential impacts primarily due to risk from flood, excess heat and drought which can lead to water scarcity.

²⁰ 2017, GoG

²¹ http://www.saversandpartners.co.uk/uploads/6/2/0/9/6209349/ce2_final_11112019_-_georgetown_disaster_risk_and_climate_change_vulnerability_assessment.pdf

The Project is considered Paris Agreement aligned based on the analysis conducted in accordance with the IDB Group Paris Alignment Implementation Approach.

4.1.d Management Programs

The University carries out monthly audits of its administration and operations which include metrics, Key Performance Indicators (“KPI’s”), and achieved targets. It also has a Strategic Plan,²² which was developed in consultation with both internal and external stakeholders and merged with an operational plan to track the University’s performance against initiatives and KPIs.²³ General management programs are also guided by the various accreditations.

The Client will include in the ESMS provisions to adequately reflect management procedures to be implemented for the Project.

4.1.e Organizational Capacity and Competency

Management of E&S matters are routed through the Chief Operating Officer (“COO”) and supported by an Operations Manager (“OM”).

For the construction phase, a Project Manager (“PM”) will be hired with responsibilities for all phases of the construction lifecycle, including but not limited to: i) obtaining all necessary permits regulations and complying with local regulations; ii) collaborating with architects, engineers, electricians, and other specialists; and iii) ensuring all local, state, and national building codes and regulations and safety precautions are followed. A Construction Manager will also be hired who will be supervised by the PM.

To adequately support E&S management for the Project’s operation, the Client will designate a health, safety, and environment (“HSE”) manager.

4.1.f Emergency Preparedness and Response

The University has an Emergency Action Plan (“EAC”) which outlines: i) the composition of an incident management committee; ii) steps to alert personnel; iii) roles and responsibilities assigned to personnel; iv) general instructions for reporting emergencies; v) way to handle medical emergencies; vi) a fire emergency plan; vii) provisions to deal with active shooters and workplace violence; viii) instructions to manage bomb threats; ix) ways to face severe weather and natural disasters; x) what to do in case of extended power loss; xi) provisions for persons with disabilities; and xii) management of disease outbreaks. It also has a separate Fire Safety Plan (“FSP”), which provides information to prepare departments, employees, and students to respond to fires.

The current EAC will be revised to include the hostel and staff accommodations and will be expanded to cover: i) drill calendars; ii) responses to other emergencies e.g., earthquake, flood (protecting electrical equipment etc.), electrocution; iii) details on maintenance and management

²² 2022 to 2025

²³ The College of Medicine maintains a separate strategic plan which does not overlap with the overall university Strategic Plan

of equipment and supplies; and iv) procedures for dissemination of information dispatched during extreme weather events.

The Client will include, as part of its ESMS, a comprehensive emergency preparedness and response plan (“EPRP”) based on the EAC.

4.1.g Monitoring and Review

The Administration and Operation departments maintain a Management Information System (“MIS”), which offers an integrated platform for tracking all risk levels and categories. This helps to inform management about regular risk monitoring and evaluation activities. Monitoring outcomes are reviewed and communicated as necessary. According to risk level, an audit team tracks implementation and efficacy of corrective actions. The operation team also monitors various activities to minimize E&S issues (e.g., monthly comparison of energy usage, monitoring water pH values; leakage of water pipelines, vehicle service detail, and waste disposal). Based on activity reports appropriate actions are initiated.

The ESMS will include a detailed and project-specific set of monitoring and review procedures.

4.1.h Stakeholder Engagement

Though the Client notes a continuous process for stakeholder engagement (e.g., stakeholder analysis and planning, disclosure and dissemination of information, dispute resolution and grievance redress, and inclusion of stakeholders in monitoring and evaluation), these are not documented formally and has no formal Stakeholder Engagement Plan (“SEP”).

The Client will therefore develop and adopt a structured Stakeholder Engagement Plan (“SEP”) as part of its ESMS. The SEP will include a proper process for stakeholder mapping for its operations and the Project. A Community Relations Officer (“CRO”) will also be designated.

4.1.h.i Disclosure of Information

The University has a public website (available in four languages²⁴) and social media accounts which are used to share information on the University and its activities.

As part of its SEP, the Client will outline a specific information disclosure process to stakeholders that considers their category, level, and type of interaction and activity being undertaken.

4.1.h.ii Informed Consultation and Participation

TAU notes that its stakeholder response mechanism addresses issues swiftly through communication and involvement, utilizing a clear and transparent procedure that is accessible to all

²⁴ English, French, Portuguese, Spanish

stakeholders without hindrance, and is culturally acceptable, rights-compatible, and easily understood. These commitments will be reflected in the SEP.

4.1.h.iii Indigenous Peoples

The Project will not generate any impacts to indigenous communities.

4.1.h.iv Private Sector Responsibilities Under Government-Led Stakeholder Engagement

TAU is an active member of the Guyana private sector community that has organized several activities such as medical outreach programs, support to old-age homes, health camps, provision of supplies to hospitals, and blood donation campaigns. The University has partnered with the Guyana Police Force (“GPF”) and Guyana Defense Force (“GDF”) to provide continued education opportunities. Through the Ministry of Education, it supports a Caribbean Examinations Council (“CXC”) online platform.²⁵ It also sponsors several forms of educational assistance packages, such as the following: i) up to 40% tuition discount for all Guyanese medical students; ii) education support for underserved Guyanese;²⁶ and iii) partnership with the Guyana Online Academy of Learning (GOAL) scholarships.²⁷

The University has also partnered with the International Development and Relief Foundation (“IDRF”) for targeted collaborations in strengthening programs aimed at increasing awareness of and addressing mental health issues affecting Guyanese.

The Project has been disclosed to the surrounding community.

4.1.i External Communication and Grievance Mechanisms

The University processes an organized complaint process available to communities adversely impacted by its operations and activities. Complaints are received and handled by the Operation Department. However, this process is not articulated formally. Student grievances are addressed through the Student Handbook which highlights an Appeals and Grievance Committee²⁸ composed of faculty and student representatives appointed by the Dean. Several avenues for recourse include: i) confidentially reports to the Assistant Dean of Student Affairs, faculty advisors, or student affairs coordinators; ii) an online student grievance portal; or iii) periodic faculty evaluation tools.

The ESMS will include an external grievance mechanism which will capture and process claims from the community. This will be adopted for the Project.

²⁵ It provides a free exam prep program which has benefited thousands of students.

²⁶ via the First Lady scholarship

²⁷ [A scholarship for Guyanese students enrolled in the colleges of Public Health, Business Management, and Information Technology](#)

²⁸ This is the University’s investigative and judicial arm addressing grievances of any member of the TAUCOM community against the University or other members of the community. These grievances do not include academic matters (e.g., grades and promotions). They also do not include challenges to the University’s educational and academic policies.

4.1.i.i External communication

External communications are channeled through the University's webpage and social media, which presents news on general University information and activities, along with WhatsApp.

4.1.i.ii Community grievance mechanism

The University notes that local communities or neighbors can send communications regarding issues or grievances via mail to the University Registrar, depending on the area of concern.

The ESMS will outline a grievance mechanism for affected communities. This will include additional channels beyond the current email option. The Client will provide evidence of dissemination and training on the grievance mechanism.

4.1.i.iii Provisions for addressing vulnerable groups' grievances

Through its handbooks and Anti-discrimination and Diversity policies, the University outlines obligations to ensure equal treatment regardless of gender, race, ethnicity, nationality, religion, disability, socio-economic status, or sexual orientation. It also emphasizes the support on participation of national, regional, and international students from medically underserved communities, and from economically and educationally disadvantaged backgrounds.

The grievance mechanism will reflect these elements and include measures to address grievances from all stakeholder groups (including vulnerable groups) relevant to the daily University operations and the Project.

4.1.j Ongoing Reporting to Affected Communities

The SEP will outline steps to ensure ongoing reporting to any communities and stakeholders affected by the University's operation or the Project.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

The Company has 72 employees (60% women and 40% men). There are 52 contractor employees.

The University is overseen by a Chief Executive Office ("CEO") with administrative staff positioned across five (5) departments which include i) Public Relations; ii) Quality and Compliance; iii) Finance and Accounting; iv) Admission and Marketing; and v) the Registrar. Deans, Assistant Deans, Heads of Departments, and teaching staff are organized under a separate structure for the medical and non-medical faculties supported by these administrative departments. There is also a Recruitment Agency Policy which defines the criteria and procedures for appointing and managing Recruitment Agents.²⁹

²⁹ A Recruitment Agent promotes the University and helps to headhunt for student applications to the University.

The Project is expected to have a construction workforce (including sub-contractors) of approximately 50-60 persons (both international and local). The University will rent nearby accommodations. The Project will employ 25% of the workforce directly and the rest through contractors. Sub-contractors will be selected from a pre-existing list, advertisement, and through the private sector. Beyond the PM, construction manager, and HSE officer, the project team will be additionally comprised of i) a civil engineer; ii) administrative assistants; iii) supervisors; iv) operators and drivers; v) security; vi) electricians, carpenters, and plumbers; vii) welders and fitters; and viii) general laborers.

The Client will provide, as part of the CMPs, contractor management details including, but not limited to i) project team job descriptions; ii) contractor housing and employment details; iii) sanitation and access to amenities; and iv) policies and procedures for the construction workforce inclusive of a grievance mechanism.

4.2.a.i Human Resources Policies and Procedures

The University's Employee Handbook covers general terms and conditions for employment which include the following topics: i) general employment basics; ii) workplace policies; iii) code of conduct; iv) compensation and development; v) benefits and perks; vi) working hours, paid time off and vacation; and vii) resignation and termination.

The Faculty Handbook provides additional detailed information for faculty staff regarding areas such as organizational structure and governance of the University, policies, faculty responsibilities, recruitment, performance review, salary, and benefits etc.

4.2.a.ii Working Conditions and Terms of Employment

Employment conditions are guided by local Guyanese labor regulations.

4.2.a.iii Workers' Organizations

There is no declaration concerning freedom of association contained in the Employee or Faculty Handbooks. Therefore, the Client will update these handbooks to include reference to collective bargaining and the right to freedom of association.

4.2.a.iv Non-discrimination and Equal Opportunity

The Employee Handbook speaks to the promotion of diversity in the workplace based with no bias regarding gender, age, sexual orientation, race, nationality, ethnicity, religion, or degree of disability.

The University also has standalone policies on anti-discrimination, and diversity and equality. The Anti-discrimination Policy outlines a commitment to *maintaining an environment free from discrimination. Discrimination based on race, color, creed, religion, disability, gender, gender*

identity, socio-economic status, national origin, age, familial status, marital status, height, weight or sexual orientation is prohibited. It applies to all staff, students, visitors, and any contractors.

The Policy on Diversity and Equity aims to *accommodate all individuals in the university community and others involved in it, regardless of their “Protected Characteristics” such as diversity, origin, religion, culture, belief, race, gender reassignment, marriage and civil partnership, pregnancy and maternity, socioeconomic status, and impairment.* It applies to staff, academic and administrative departments, and extends to prospective staff, as well as others who engage with the University.

The Safeguarding Policy further speaks to creating *an atmosphere that is safe, welcoming, and free from harm and all types of bias, harassment, discrimination, and bullying.*

4.2.a.v Retrenchment

At present, there are no plans for collective dismissals.

4.2.a.vi Grievance Mechanism

Grievance procedures for staff are disaggregated in the Employee and Faculty Handbooks, and Safeguarding Policy. However, the procedures do not include a thorough description of different grievance categories and assessment procedures, timing of responses beyond formal reports, anonymity, anti-reprisals policy nor dissemination mechanisms. The University will therefore update the Employee and Faculty Handbooks grievance procedures to include these aspects, and will articulate these elements within its ESMS to address internal and external grievances which further include: i) a description the specific channels for grievance reception; ii) the teams responsible for grievance reception, assessment, and response; and iii) the expected timing of responses.

4.2.b Protecting the Workforce

4.2.b.i Child Labor

According to Guyanese legislation, the minimum age for employment is fifteen (15) years. The minimum age of employment for the University is nineteen (19) years. Though, the University complies with Guyanese labor law, and the Health and Safety Policy (“HSP”) summarizes safeguarding situations for children and adolescents, there are no provisions against child labor in the HSP or its Student, Employee and Faculty handbooks.

The Client will update the HSP and relevant handbooks to include provisions against the use of child labor.

4.2.b.ii Forced Labor

Guyana has ratified the International Labor Organization’s (“ILO”) Convention No. 29 on Forced Labor and Convention No. 105 on Abolition of Forced Labor. Although the Client complies with

Guyanese labor legislation, there are no provisions against forced labor in the HSP and Student, Employee and Faculty handbooks.

The Client will update the HSP and relevant handbooks to include provisions against the use of forced labor.

4.2.c Occupational Health and Safety

The University's daily operations are guided by the local Occupational Safety and Health Act. Workplace safety and health are covered further under several internal plans and policies which include the FSP, EAC, and HSP. Specifically, the HSP aims *to promote and maintain a safe and healthy environment for its trainers, staff, students, and visitors* and outlines primary management and implementation responsibilities through i) the URM; ii) the CEO; iii) Academic heads and staff; and iv) the OM. The OM ensures that the safe condition of premises, grounds, roads, internal and external circulation spaces, building fabric, equipment, facilities, services, etc. are maintained, and serves as the focal point for fire safety with responsibility for inspection, testing, and maintenance of i) fire detection and warning systems; ii) fixed fire-fighting systems; iii) emergency lighting systems; and iv) fire compartmentalization and separation.

The Employee Handbook outlines that the University will undertake risk assessments and job hazard analyses ("JHA") via the URM on a regular basis to identify health concerns among employees. It notes that failure to wear protected gear where required or willful disregard of safety rules and policies may result in termination.

The Client will submit its i) Exposure to Infectious and Environmental Hazards Policy; ii) Laboratory Safety Policy; iii) Laboratory Safety Rules and Guidelines; and iv) annual risk assessments.

4.2.d Provisions for people with disabilities

The Safeguarding Policy summarizes safeguarding situations for children, adolescents, and adults who are vulnerable, and outlines steps to address safety concerns. The EAC has a section regarding persons with disabilities and outlines responsibilities for Aides for Persons with Disabilities ("APD"). However, the existing University building does not accommodate Universal Access ("UA").

The Client will therefore i) ensure final designs for the Project include features for UA; ii) conduct an assessment on the existing building design to enable retrofit to accommodate UA; and iii) provide evidence of training for APD's.

4.2.e Workers Engaged by Third Parties

The Employee Handbook refers to workplace regulations which are applicable to all members of the organization, including stakeholders, contractors, volunteers, and employees. The policies on anti-discrimination, and diversity and equality apply to staff, students, visitors, and any contractors. The HSP outlines contractor responsibilities.

Given the anticipated influx of contract workers, the Client will prepare contractual clauses for the Project to ensure that contractors are bound to these policies and obligations outlined in the Employee Handbook. These will also be reflected in the CMPs as part of contractor management details. The Client will also ensure that these provisions are communicated to pre-existing contractors during the procurement of new services.

4.2.f Supply Chain

The University has a Vendor Evaluation Form (“VEF”) which is used to assess quality and origin of products. However, there are no guidelines or indicators to measure these parameters.

The University procurement policy and VEF will therefore be updated to include specific guidelines on scoring regarding provisions against child and forced labor, along with sustainable practices. These requirements will be communicated to third parties such as contractors and sub-contractors.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

Power for daily operations energy is provided by Guyana Power and Light Incorporated (“GPL”) supported by a diesel generator. Current consumption averages 1,600 kWh per annum. The University building was designed to facilitate open air ventilation and circulation, is equipped with energy saving bulbs, along with single flush toilets and water efficient urinals. It also recently received a local Green Business Award³⁰, conducted an EDGE audit towards certification and prepared a Sustainability Strategy.³¹

The Project will be similarly connected to GPL with generators. Options are being assessed to incorporate green building design elements such as solar power, solar passive architecture, and smart energy and water consumption efficient features. The Client is planning to prepare an annual Sustainability Report.

The Client will i) provide a progress report on Edge Certification; ii) submit the annual Sustainability Report and results of energy audits; and iii) confirm final Project design with sustainability features.

4.3.a.i Greenhouse Gases

Due to the nature of the University’s operation, it is expected that its GHG emissions will not be material.

³⁰ [Outstanding Green Business Award 2020 awarded by Georgetown Chamber of Commerce and Industry](#)
³¹ 2021-2025

4.3.a.ii Water Consumption

Water for the University is supplied by Guyana Water Incorporation (“GWI”) with 30% used for processing operations, 40% for sanitary purposes, and the remainder for general use. Usage is monitored periodically by the OM with systems in place to check and monitor any leakages or overflows.

The Project will be similarly connected to this network with an anticipated usage of approximately of 9,800 gallons (37,500 liters) per day. The Client has committed to implementing additional water saving and harvesting features for existing operations and the Project.

4.3.b Pollution Prevention

The existing diesel generator for the University is serviced regularly according to manufacturer’s specification to ensure full operational efficiency and limit excess emissions.

Measures to ensure pollution prevention during construction will be specified in the CMPs.

4.3.b.i Wastes

Waste streams for the University are linked to sanitary liquid waste³² (e.g., bathrooms, canteen), stormwater, and solid waste (e.g., kitchen, bathrooms, classrooms, landscaping). An average of 9,700 lbs. (4,400 kg) of solid waste is generated on a weekly basis. Sewage treatment is contracted to an external service provider, and general waste disposal is provided by a third-party company³³ for disposal the locally approved landfill site³⁴. Recycling of wastewater via a sewage treatment plant is being considered for the Project.

The Client will develop and adopt for the Project an Operational Waste Management Plan (“OWMP”) for all liquid, solid and gaseous waste streams.

4.3.b.ii Hazardous Materials Management

Management of hazardous materials will be managed through the CMP and OWMP.

4.3.b.iii Pesticide Use and Management

The University is prone to rat infestation. Therefore, a pest control company has been hired to periodically set up several bait stations around the campus. Given the latter, the OWMP will include a commitment to not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.³⁵

³² 800-1000 gallon per month

³³ Cevon’s Waste Management Inc

³⁴ Haags Bosch Sanitary Landfill Site Facility, Eccles (East Bank Demerara)

³⁵ According to Hazard Class Ia (extremely hazardous); or Ib (highly hazardous).

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

The Project's interventions are not expected to generate significant E&S impacts. However, daily operations and construction activity for the Project may produce small-scale localized impacts associated with: i) waste generation; ii) noise emissions; iii) air and dust emissions; iv) occupational health and safety impacts including those linked to gender; and v) traffic disturbance. Given that the sites are in a commercial area with active ongoing development, indirect and cumulative impacts may include disruption of campus activities during periods of construction or other infrastructural upgrades, alongside temporary access restrictions to neighboring households of the Elline Ville housing development. These impacts will be managed via the CMPs, the CRO, and grievance procedures.

During the Project's operation phase, the Client will manage associated risk through the ESMS.

4.4.a.i Infrastructure and Equipment Design and Safety

The current University building is equipped with basic fire suppression system features ("FSS") such as detectors, extinguishers, and alarms. However, there is no sprinkler system and not all rooms have detectors.

The URMC has recently recommended general building maintenance and developmental items for the upcoming semester such as installation of solar panels, waterproofing of the terrace, building whitewash (painting), refurbishing furniture, repair and maintenance of classroom fittings (e.g., electric switches, lights, audio system), and servicing of air conditioning ("AC") units and the generator.

The Project will involve modular construction, and Life and Fire Safety ("L&FS") engineering designs are being finalized according to local regulations.

The Client will: i) enhance the FSS for the existing University building; ii) develop a plan to enclose the perimeter for the University's diesel generator; iii) update the FSP to reflect (a) maintenance and monitoring needs, (b) specific schedule and (c) outline on training and practice (i.e., simulations and drills), and equipment requirements for employees responsible for any response operations; iv) submit progress report on URMC recommendations; and iv) submit report on final L&FS design and implementation for the Project

4.4.a.ii Hazardous Materials Management and Safety

Hazardous Materials Management and Safety will be managed through the CMP and OWMP.

4.4.a.iii Ecosystem Services

The Project will not produce any material impact on ecosystem services.

4.4.a.iv Community Exposure to Disease

Given the Project's community profile, the University will update the EAC to capture and categorize a response to other general communicable disease outside of Covid-19, including sexually transmitted diseases ("STD").

Other measures to address community exposure during operation and construction will be managed through the Safeguarding Policy and CMP respectively.

4.4.a.v Emergency Preparedness and Response

The Staff Handbook and current EAC cover emergency management. These measures will be enhanced through the EPRP in the ESMS and adopted for the Project.

4.4.b Security Personnel

The University has an internal security team along with an external armed guard service. The team is led by the retired Assistant Commissioner of GPF. Only security personnel with prior experience are recruited and this includes background checks and criminal clearance.³⁶ Security cameras are strategically placed throughout the University campus. The Project intends to engage a private company to provide armed guard security. Site 2 is also situated in a gated community.

The Client will submit a security risk assessment to identify internal and external security risks for the Project and how these will be managed.

4.5 Land Acquisition and Involuntary Resettlement

The lands for the Project are vacant and wholly owned by the Client: Site 1 is a part of the existing University Campus and Site 2 has been recently acquired via private purchase. The Project will therefore not require the acquisition of land and will not cause any physical or economic involuntary displacement of the population.

4.6 Biodiversity Conservation and Natural Habitats

The Project will generate no material impacts to biodiversity.

4.7 Indigenous Peoples

The Project will not affect any indigenous community, nor will it intersect any indigenous territory.

³⁶ Police Clearance Certification

4.8 Cultural Heritage

The Project will not affect any cultural heritage. However, chance finds procedures will be outlined in the CMPs.

5. Local Access of Project Documentation

Information relating to the project can be accessed at the following link:

<https://gy.tauedu.org/>