Environmental and Social Safeguarding Policy

Health Education and Development Society (HEADS)

Abstract

This Environmental and Social Safeguarding Policy outlines HEADS' commitment to minimizing environmental and social risks across its programs in compliance with national and international standards. It provides a structured framework for environmental assessments, social impact mitigation, stakeholder engagement, grievance redressal, and occupational health and safety. The policy ensures inclusive, climate-resilient, and sustainable development through strong compliance mechanisms, capacity building, and transparent implementation processes.

This policy has been revised in January 2025 for a period of one years and will be revised in January 2026. However, changes or amendments will be incorporated earlier if required due to any revisions in relevant government policies, global standards, or donor requirements.

www.heads-ngo.org

Background:

Health, Education and Development Society (HEADS), is a non-profit, non-political and non-governmental organization registered in Pakistan under the Societies Act 1860. Since its establishment in 2013, HEADS has been actively engaged in the developmental and humanitarian sectors. The organization is led by a dedicated Board of Governors (BoG), consisting of professionals with diverse educational backgrounds and capabilities. HEADS operate under a comprehensive set of policies designed to ensure transparency, accountability and efficiency in its systems and operations. HEADS Currently registered in the Islamic Republic of Afghanistan, and established an office in the capital city, Kabul.

Throughout its history, HEADS has worked closely with communities and various stakeholders, addressing a wide range of issues, including but not limited to Education, Health, Protection, Livelihoods, Community Infrastructure (CPIs), Shelter and Settlement, Community Development, Institutional Capacity Building, Research, Gender Equality, Legal Counselling, Referral Mechanisms, Social Accountability, Right to Information, and Governance.

In addition to these programmatic areas, HEADS place a strong emphasis on cross-cutting themes, including social mobilization, gender mainstreaming, inclusion, and resilience in all its core programs. These themes reflect the organization's commitment to addressing the holistic needs of communities and promoting sustainable development.

Vision: Every Individual regardless of background or circumstances enjoy equal opportunities and rights with dignity.

Mission: Empowering Communities through strategic investment in human capital and institutional capacity development, raising sustainable development at the grassroot level.

Objectives:

o Support and develop replicable models and strategies for sustainable human resource development through skills development initiatives.
o Network and collaborate with the Govt. Departments, NGO's, CBO's, WOs and international agencies/donors for sustainable development.
o Support initiatives for sustainable community-based gender sensitive development with particular focus on; Human and institutional Development, Natural Resource Management, Drinking Water Supply, Environmental Sanitation, Education, Agriculture, Health & Nutrition, Disaster Management and Micro Credit & Enterprise.
o Create economic and recreational opportunities for youth through skill enhancement programs for peace promotion.
o Enable equitable access to quality education and healthcare, raising holistic community development and well-being.
o Promoting Social Inclusion and Empowerment.
o Strengthening Resilience to Climate Change and Environmental Degradation.
o Advocacy for Peace, Human Rights, and Social Justice.

o Building Disaster Resilience and Preparedness

Introduction

The Environmental & Social Safeguards Policy of HEADS reflects its commitment to sustainable development, environmental responsibility, and social inclusion. HEADS recognizes the critical role of environmental protection and social equity in achieving long-term positive impacts for communities. This policy ensures compliance with national and international standards, integrating risk mitigation strategies into all programs and operations. HEADS is committed to implementing robust environmental management systems, social protection measures, stakeholder engagement frameworks, and grievance redressal mechanisms to safeguard natural ecosystems and vulnerable populations. Through structured monitoring, compliance reviews, and continuous capacity building, HEADS strives to minimize environmental risks, promote sustainable resource use, and uphold human rights while fostering inclusive and resilient communities.

Purpose of the Policy

This policy aims to:
o Integrate environmental sustainability and social responsibility into HEADS' operations.
o Ensure compliance with national and international environmental regulations.
o Safeguard communities and ecosystems from negative environmental and social impacts.
o Provide guidelines for risk mitigation, monitoring, and reporting on environmental and social performance.

Key Policy Outlines
o **Environmental Compliance Framework:** Screening, categorization, and Environmental Management Plans (EMPs).
o **Regulatory Approvals & Risk Mitigation:** Adherence to PEPA Act 1997 and WHO protocols for hazardous waste.
o **Occupational Health & Safety (OHS):** Training of personnel and safe disposal of infectious materials.
o **Social Safeguards Management System (SMS):** Screening, assessments, mitigation strategies, and capacity building.
o **Community Engagement & Grievance Redressal:** Transparent complaint mechanisms and stakeholder participation.
o **Sustainability & Climate Resilience:** Implementing eco-friendly practices and adaptation strategies.
o **Instrumental Monitoring & Reporting:** Establishing air, water, and noise pollution monitoring mechanisms.
o **Capacity Building & Implementation Strategy:** Strengthening staff expertise in environmental and social safeguards.

o **Indigenous Peoples' Rights & Inclusion:** Ensuring proper consultation mechanisms for affected communities.

Environmental Safeguards

Environmental safeguards ensure that all HEADS projects minimize their ecological footprint and comply with legal and regulatory standards. This section outlines the framework for environmental risk assessments, waste management, and pollution control to promote sustainable development.

Environmental Compliance & Risk Management

o **Project Screening & Categorization:** Environmental risk assessments conducted at the project inception stage.
o **Environmental Assessment Reports (IEE/EIA):** All high-impact projects undergo Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA).
o **Regulatory Approvals & NOCs:** Compliance with Pakistan Environmental Protection Act (PEPA) 1997 and amendments.
o **Implementation of Environmental Management Plans (EMPs):** Monitoring air, water, and noise pollution in project areas with documented records.
o **Instrumental Monitoring:** Regular assessment of air, water, and noise pollution using approved monitoring instruments and submission of reports to regulatory bodies.
o **Environmental Protection Strategy:** Incorporating carbon footprint reduction, water conservation, and promotion of renewable energy use.

Waste Management & Hazardous Material Handling

Proper waste management is crucial to reducing environmental pollution and protecting public health. This section defines protocols for handling infectious waste, reducing emissions, and promoting sustainable resource use.

o **WHO Protocols for Infectious Waste:** Safe disposal of medical and hazardous waste, particularly in health-related projects.
o **Pollution Control Measures:** Reduction of emissions, water conservation, and use of renewable energy.
o **Biodiversity Conservation:** Tree planting, habitat restoration, and wildlife protection.
o **Sustainable Resource Use:** Promoting energy-efficient practices in all offices and project sites.

Occupational Health & Safety (OHS) Compliance

Ensuring workplace safety and public health protection is a priority for HEADS. This section highlights measures for training OHS personnel, pandemic preparedness, and compliance with WHO protocols.

- Trained OHS Personnel: Designated staff responsible for health and safety compliance.
- Pandemic Preparedness: Protocols for managing operations during health emergencies, including contingency planning.
- Safe Handling of Infectious Waste: Training staff on WHO-compliant waste disposal methods and occupational hazard prevention.
- Health & Safety Compliance Monitoring: Regular inspections, audits, and enforcement measures for workplace safety.

Social Safeguards

Social safeguards ensure that all projects respect human rights, promote social inclusion, and mitigate negative impacts on vulnerable communities. This section details risk management, community engagement, and grievance resolution mechanisms.

Social Management System (SMS)

The Social Management System (SMS) provides a structured approach to identifying, assessing, and mitigating social risks associated with project implementation.

- Screening & Categorization of Social Risks: Identifying potential social impacts before project initiation.
- Social Impact Assessments (SIA): Developing impact reports to identify risks and mitigation measures.
- Mitigation Strategies: Addressing adverse effects on vulnerable communities, including women, children, and indigenous groups.
- Capacity Building for Social Safeguards: Implementing structured training programs for staff and partners to enhance knowledge and compliance with social protection measures.
- Displacement & Resettlement: Establishing policies for compensation, relocation assistance, and community consultation.

Community Engagement & Stakeholder Participation

HEADS is committed to ensuring meaningful participation of communities in decision-making processes. This section establishes mechanisms for public consultations and transparent engagement with affected stakeholders.

- Public Consultations: Engaging affected communities in project planning and decision-making.
- Grievance Redressal Mechanism: Establishing a transparent, accessible complaint resolution system.
- Monitoring of Mitigation Measures: Ensuring compliance through routine checks and documentation of implemented social safeguards.
- Indigenous Peoples' Rights: Ensuring meaningful participation and protection of indigenous communities in project development.

Social Inclusion & Equity

Promoting gender equality, protecting child rights, and addressing the needs of marginalized groups are key principles of HEADS' social safeguard policy. This section outlines the organization's approach to fostering inclusive development.

- o **Gender Equality & Child Protection:** Ensuring project activities are gender-sensitive and protective of children's rights.
- o **Indigenous & Vulnerable Populations:** Addressing the needs of marginalized groups through inclusive programming.
- o **Social Compliance Standards:** Adhering to international labor laws, human rights standards, and ethical workforce engagement.

Compliance Monitoring

Compliance and monitoring are essential to ensuring that environmental and social safeguards are effectively implemented. This section defines regulatory standards, internal review processes, and reporting mechanisms.

Compliance with National & International Standards

HEADS aligns its policies with recognized national and international regulations, ensuring adherence to best practices in environmental and social governance.

- o **Pakistan Environmental Protection Act (PEPA) 1997**
- o **World Bank & ADB Environmental and Social Safeguard Policies**
- o **WHO Occupational Health & Safety Protocols**
- o **ILO and UN Social Protection Guidelines**

Implementation & Reporting Framework

A structured reporting framework ensures accountability in implementing safeguards. This section defines roles and responsibilities for monitoring, compliance reviews, and performance audits.

- o **Quarterly compliance reviews** to assess adherence to policies.
- o **Annual environmental & social performance reports** submitted to regulatory authorities and donors.
- o **Third-party audits** for independent verification of compliance.
- o **Responsible Teams & Reporting Structures:** Assigning focal persons for environmental and social monitoring, ensuring that findings are documented and corrective actions are implemented.

Roles & Responsibilities

Effective implementation of environmental and social safeguards requires clearly defined roles and responsibilities across the organization.

Environmental & Social Safeguards Compliance Team

o **Environmental Safeguards Officer:** Ensures compliance with environmental regulations, conducts risk assessments, and oversees waste management.
o **Social Safeguards Specialist:** Handles stakeholder engagement, social impact assessments, and grievance redressal.
o **Monitoring & Evaluation (M&E) Officer:** Tracks policy implementation, conducts periodic reviews, and compiles compliance reports.
o **Training & Capacity-Building Coordinator:** Develops training materials, organizes staff capacity-building programs, and ensures awareness of social and environmental safeguards.

Monitoring & Evaluation

o Conduct quarterly compliance reviews and annual policy evaluations.
o Submit environmental and social performance reports to regulatory authorities and donors.
o Ensure corrective actions are implemented for any non-compliance findings.

Complaint Redressal & Stakeholder Engagement

o Establish a grievance redressal committee for timely resolution of community complaints.
o Maintain transparent communication channels for affected stakeholders.

Policy Review & Updates

Continuous policy review and adaptation are necessary to keep pace with emerging challenges and regulatory changes. This section describes the process for periodic policy updates and capacity-building initiatives to enhance compliance.

o **Annual policy reviews** by the Safeguards Compliance Committee.
o **Revisions based on lessons learned, regulatory updates, and donor requirements.**
o **Staff training sessions** to ensure continued compliance with environmental and social safeguards.
o **Integration of Lessons Learned:** Regularly updating best practices based on field experience and emerging regulatory changes.

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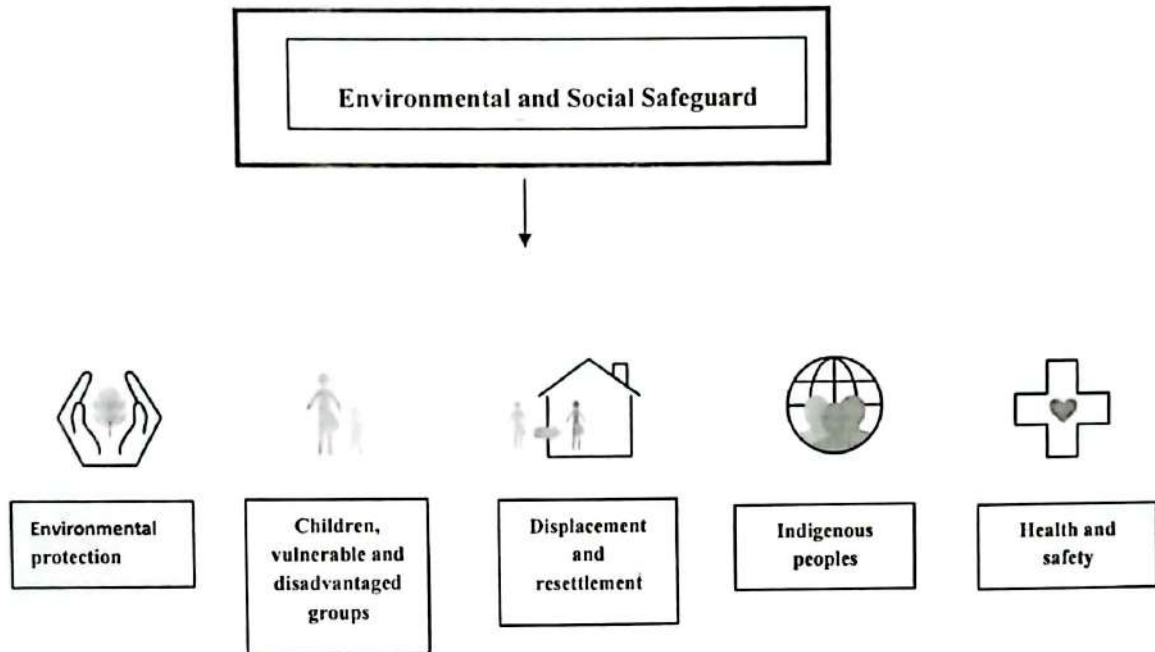
BOD Meeting Minutes

Date: January 06, 2025

Participated by:

Raza Ullah Jan	Executive Director
Uzma Amin	Chairperson Board
Samina Khanam	Board Member
Nawaz Ali Shah	Board Member
Amabareen Banori	Board Member
Muhammad Jidran	Board Member
Abid Ali	Board Member
Tahira Nasreen	Board Member
Sayed Ali Shah	Director Program
Asif Ali	Director Finance
Ramsha Khan	HR Officer

Agenda Items:

- Change in Leadership position
- Formation of the Annual Report, Annual Budget, and Strategic Plan.
- Completion of the NDRMF Capacity Improvement Action Plan.
- Processing for Charity Commission in Balochistan and Khyber Pakhtunkhwa.
- Revision of HEADS policies.
- Renewal of Society Act Registration for 2025.

Proceedings & Outcomes:

The meeting commenced with the recitation of the Holy Quran, followed by a formal welcome note delivered by the Chairperson, Ms. Uzma Amin, and the Executive Director, Mr. Raza Ullah Jan. The discussions focused on the agenda items and organizational improvements.

- The Board decided to shift Mr. Raza Ullah Jan from the position of Chairperson of the Board of Directors (BOD) to Executive Director of HEADS, following the resignation of Ms. Samina Khanam from the role of Executive Director. Ms. Khanam has now joined the Board as a Board Member. Additionally, Dr. Uzma Amin has been appointed as Chairperson of the Board, effective immediately.
- The Board emphasized the importance of preparing Annual Report/ Annual Budget and Strategic Plan to assess the organization's current standing and plan strategically for the upcoming year.
- As HEADS has been conditionally accredited by the National Disaster Risk Management Fund (NDRMF) for six months, the Board reviewed the shared Capacity Improvement Action Plan. It was decided to prioritize its completion within the stipulated timeframe, recognizing this as a crucial opportunity for the organization.

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- The Board agreed to initiate the process for Charity Commission registration in Balochistan. Police verification for the Charity Commission in Khyber Pakhtunkhwa will be expedited to obtain the certification promptly.
- A comprehensive review of organizational policies was conducted. The Board proposed and approved necessary amendments to align with current needs and best practices.
- It was noted that the Society Act Registration expired in December 2024. The Board resolved to apply for its renewal for 2025 without delay.

The meeting concluded with a thorough review of the agenda items, ensuring they aligned with the organization's strategic objectives. The Board expressed optimism about the successful execution of the discussed initiatives. The Chairperson concluded the meeting with a vote of thanks.

Signed on this Monday January 06, 2025 by authorized signatory.
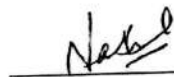
Dr. Uzma Amin
Chairperson Board

Ms. Samina Khanam
BOG Member

Mr. Nawaz Ali Shah
BOG Member

Mr. Abid Ali
BOG Member

Mr. Sayed Ali Shah
Program Director HEADS

Miss. Ramsha Khan
HR Officer

Mr. Raza Ullah Jan
Executive Director

Mr. Muhammad Jidran
BOG Member

Miss. Ambareen Banori
BOG Member

Miss. Tahira Nasreen
BOG Member

Mr. Asif Ali
Director Operations HEADS

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Policy Review & Update Record

A Board meeting was held on January 6, 2025, with the key agenda of reviewing and updating all organizational policies of HEADS. The Board advised the management to undertake a comprehensive policy review to ensure relevance, compliance, and alignment with organizational goals and evolving operational needs.

In line with this directive, all organizational policies were reviewed and amended on January 31, 2025, under the leadership of the Executive Director and with the involvement of the Finance & Audit Committee and relevant departments.

The review process included:

- A thorough evaluation of existing policies.
- Revisions based on internal assessments, audit findings, regulatory requirements, and best practices.
- Incorporation of feedback from staff and stakeholders.
- Updates to enhance clarity, accountability, and operational effectiveness.

Means of Verification:
Revised policy documents, review reports, and documented feedback and approval records.

(H E A D S)

Raza Ullah Jan
Executive Director