



Grenada National Occupational Safety and Health (OSH) Policy



NATIONAL OCCUPATIONAL SAFETY AND HEALTH (OSH) POLICY FOR THE STATE OF GRENADA

ACKNOWLEDGEMENT

The Ministry of Labour acknowledges the contributions made by Ministries, other Government Departments, Statutory Bodies, the ILO and the private sector to the development of the National Occupational Safety and Health Policy for Grenada. The intention is to create a safe and healthy work environment for employees in keeping with international standards. As such, the Ministry acknowledges the following entities who participated in this exercise:

- 1. ADM Caribbean Agro Industries Ltd
- 2. Grenada Bureau of Standards
- 3. Grenada Medical Association
- 4. Grenada Chamber of Industry and Commerce
- 5. Grenada Employers' Federation
- 6. Grenada Marine
- 7. Grenlas Management
- 8. T.A. Marryshow Community College
- 9. Jonas Browne and Hubbards Grenada Ltd.
- 10. Grenada Technical & Allied Workers' Union
- 11. National Insurance Scheme
- 12. National Water and Sewage Authority
- 13. Grenada Electricity Services Ltd.
- 14. St. George's University
- 15. Grenada Airports' Authority
- 16. Grenada National Training Agency
- 17. Bank and General Workers' Union
- 18. Grenada Ports Authority
- 19. Creative Design & Building Construction Co. Ltd.
- 20. Quinn Company Ltd.
- 21. Grenada Bar Association
- 22. Ministry of Legal Affairs
- 23. Ministry of Climate Resilience, the Environment, Forestry, Fisheries, Disaster Management and Information
- 24. Grenada Manual Maritime & Intellectual Workers' Union
- 25. Ministry of finance, Planning, Economic Development and Physical Development
- 26. Department of Public Administration
- 27. Ministry of Health, Social Security and International Business
- 28. Sandals La Source Grenada
- 29. Ministry of Labour
- 30. Grenada Solid Waste Management Authority

- 31. FLOW
- 32. Seamen and waterfront Workers Union
- 33. Sunsation Tours
- 34. Public Workers Union
- 35. Grenada Breweries
- 36. Grenada Union of Teachers
- 37. Marine and Yachting Association of Grenada

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ABBREVIATIONS

CVQ - Caribbean Vocational Qualifications

DOL – Department of Labour

HSR - Health and Safety Representative

ILO – International Labour Organisation

MIS – Management Information System

NIS – National Insurance Scheme

OSH - Occupational Safety and Health

PPE – Personal Protective Equipment

NATIONAL OSH POLICY FOR THE STATE OF GRENADA

Introduction

Grenada joined the International Labour Organisation (ILO) in 1979, a few months after the Grenada Revolution. Grenada has since ratified 26 ILO Conventions, with the earliest, C81 - Labour Inspection Convention, ratified in 1979 and most recently, C155 - Occupational Safety and Health (OSH) Convention, ratified in 2012. Convention C155, provides a basis for the government to develop the national OSH policy in consultation with the employers and workers organizations. It requires ILO Members, in the light of national conditions and practice, and in consultation with the most representative organizations of employers and workers, to formulate, implement and periodically review a coherent national policy on occupational safety, occupational health and the working environment.

The promotion of OSH greatly contributes to the improvement in working conditions. Governments and social partners further develop national OSH systems to improve the well-being of workers which will eventually contribute to productivity improvements in enterprises and better-quality products and services. Occupational accidents and disease occur in workplaces across Grenada, in the formal and informal sectors, and in public and private enterprises. Data received from the National Insurance Scheme (NIS) indicate the level of occupational accidents and the associated costs. This data is specific to the NIS and does not capture all of those occurring within the informal sector.

Benefit Expenditure by Year and Type

Benefit Type	2014	2015	2016	January to July 2017	January to July 2018	August to October 2018
Sickness	\$ 4,624,537	\$ 4,249,598	\$ 5,849,911	\$ 304,780	\$ 324,353	\$ 2,339,814
Employment Injury	\$ 254,257	\$ 297,524	\$ 337,003	\$ 4,225,650	\$ 6,224,758	\$ 127,335

The Ministry of Labour recently revised the Employment Act and the Labour Relations Act and these were presented to Parliament in 2016. An OSH bill has also been drafted, but its enactment will be preceded by a national OSH policy. The new OSH act will repeal the Accidents and Occupational Disease (Notification) Act Chapter 2, the Agricultural Workers Amenities Act Chapter 11, and the Factories Act Chapter 100. It is noted that Grenada has developed a number of other national policies of relevance to this policy, such as:

- Decent workplace policy of Grenada
- GTUC policy on OSH
- Grenada HIV/AIDS policy
- Training policy
- Environment policy
- National drug policy

With the support of the ILO the Department of Labour (DoL) hosted a number of national tripartite consultations with a view to finalizing this National OSH Policy for Grenada. A first consultation was convened on November 9 and 10, 2016, and the first draft policy was developed on the basis of these discussions. This draft was circulated to all relevant stakeholders for their review. In addition, to ensure that there was broad national awareness and support of the draft policy, three (3) consultations were also conducted with tripartite representatives and local actors, including representatives of the informal sector and cooperatives, throughout Grenada. The draft was further reviewed during a tripartite workshop held on September 28, 2018, and submitted again to stakeholders for comments and subsequently to Cabinet for approval.

The National OSH Policy sets out the tripartite vision for OSH, and identifies agreed spheres for action. Grenada is adopting the systems approach to OSH advocated by the ILO Global Strategy which is premised on the PDCA¹ cycle. At the national level, the strategy has four elements:

- 1. Policy, to provide a framework for national-level action to improve OSH.
- 2. System, to describe available infrastructure and resources.
- 3. Profile, to describe the national OSH situation.
- 4. Programme, a time bound 3 to 5 year plan that identifies OSH gaps, and clearly sets out objectives, targets and indicators, and implementation mechanisms.

This systems approach is cyclical, with regular reviews that capture new developments and revise priorities for action.

The national consultations included representation from authorities with OSH-related responsibilities, public and private sector employers and employees, the Employers' Federation and the Grenada Trade Union Council. The consultations facilitated the sensitisation of participants to the importance of adopting a culture of prevention, where the right to a safe and healthy working environment is respected at all levels; governments, employers and workers actively participate in securing a safe and healthy working environment through a system of defined rights, responsibilities and duties; and the highest priority is accorded to the principle of prevention.

The resulting policy statement has been arrived at by consensus among all stakeholders, is a statement of their commitment to OSH in the work place, and acknowledges their respective roles and responsibilities. The National OSH Policy will be complemented with the OSH profile, which will provide a diagnostic of the existing OSH situation, including national data on occupational accidents and diseases, high-risk industries and occupations, and a description of the national OSH system and its current capacity. Finally, the OSH Programme will include priorities, objectives and targets for improving OSH within a predetermined timeframe, and indicators to assess progress.

¹ plan do check act

Statement

The intention of this policy is to create a proactive safety culture that will reduce the occurrence of near misses, incidents and accidents that may result in personal injury and/or damage to property and the environment within the State of Grenada.

Vision

The State of Grenada will foster a prevention Culture to build a modern and dynamic OSH System ensuring that safe and healthy workplaces are provided to all workers with the objective of increasing wellbeing and productivity.

Aim and purpose

The OSH policy will seek to ensure that:

- 1. There is a safe and healthy work environment and work processes for all workers and users within the State of Grenada.
- 2. There is a culture of occupational accident and disease prevention that includes information, consultation and training.
- 3. There are policy orientations to modernize the policies and procedures of the DoL.

Objectives

- 1. Foster a positive national culture of OSH at all levels in society, with an emphasis on prevention of occupational accidents and diseases. This implies the inclusion of OSH prevention in education, training and development activities.
- 2. Improve productivity and wellbeing of workers through a progressive reduction in the incidence of work related injuries, diseases and fatalities in all sectors of the economy and in all forms of work.
- 3. Enhance the legal framework and the enforcement capacities of the relevant institutions to build a modern and dynamic OSH system ensuring that safe and healthy workplaces are provided to all workers.
- 4. Create awareness and address psychosocial risks and work-related stress.
- 5. Promote coordination amongst institutions with an OSH mandate.

Policy principles

i. Prevention

Actions arising from this policy will be focused on the prevention of occupational risks rather than compensation, rehabilitation and curative services, giving major attention to risk assessment and control, including the impact of psycho-social risks and work-related stress.

ii. Social Dialogue

The Government will ensure that social partners and other relevant stakeholders are consulted during formulation, implementation and review of all policies, systems and programmes at all levels. Social dialogue will include processes related to administration, compliance and regulation through effective mechanisms of information and consultation.

iii. Equity and gender equality

This policy will be applied in all workplaces and uniformly enforced. Comprehensive consideration of gender issues at all levels will promote equity and equality between men and women so that mainstreaming gender becomes a common practice in all OSH policies and programs.

iv. Collaboration and functional cooperation

Regulatory and implementing agencies will collaborate and communicate with enterprises and each other, to ensure that there is understanding of risks and required mitigation measures to ensure protection of all parties are effectively implemented.

Social partners and relevant stakeholders will collaborate, coordinate and actively participate in OSH initiatives, to effectively integrate interventions.

v. Knowledge and evidence-based decision making

A preventive safety and health culture will be inculcated across the nation through information dissemination, consultation and training. OSH programmes will be developed with a focus on OSH priorities, determined on the basis of available information. Systems for collection and analysis of representative OSH data will be developed to inform the design of effective and responsive programmes.

vi. Environmental protection and sustainability

This policy recognizes that economic activity has the potential to damage the environment. Workplace operations will be managed sustainably, so as to protect workers and public health.

vii. Continuous improvement

All parties will seek to progressively and actively improve OSH conditions, recognizing that there will be a transition period as OSH awareness and compliance capacity grows. Policies and practices will be updated taking into consideration socio-economic changes, technological progress and new hazards.

Parties covered by the policy

All workers within the State of Grenada are to be covered by this policy, whether full-, part-time or otherwise employed, including interns, the differently abled, prisoners and sub-contractors. Actions derived from this policy will be implemented in every workplace, whether in the public, private or informal sectors, and will be equitable, inclusive and without discrimination. Other persons who have cause to be within the workplace should also derive protection from this policy.

Spheres of Action

- I. Demonstrate national high level political commitment to the importance of OSH The Government will demonstrate its commitment to the importance of OSH, through:
 - 1. Establishment of a tripartite committee to facilitate broad based communication at the national level.
 - Committing requisite resources to the DoL and other relevant regulatory and implementing authorities, to ensure that the OSH legislation, regulations and standards can be effectively administered.
 - 3. Complying with ILO Conventions on OSH that the government has ratified, and maintaining consistency with the ILO Global Strategy on OSH.
 - 4. Providing forums for consultations between employers, workers and community on OSH matters of national importance.

All stakeholders (government, private sector and labour representatives) will provide the resources required to ensure that they may properly fulfill their respective roles under this policy.

II. Improve legal and regulatory frameworks

The Government, in consultation with the social partners, will:

- 1. Provide a suitable legal and regulatory framework by drafting and enacting legislation, as required, in congruence with international standards and practices.
- 2. Provide for its enforcement by the various authorities, so as to protect workers including the physically challenged, and the environment.
- 3. Guarantee protection of workers and their representatives from disciplinary measures in accordance with the Employment Act.
- 4. Establish standards for Personal Protective Equipment (PPE).
- 5. Incorporate OSH considerations into other national policies, legislation and regulations as appropriate.

III. Engage in more effective functional cooperation and coordination

The Government will:

- 1. Improve collaboration between regulatory agencies with an inspection role, such as those with a responsibility for fire services, physical planning and health, to ensure that their inspection, reporting and enforcement roles more effectively address OSH concerns. Physical Planning is required to ensure that the design and construction of buildings meet OSH needs. Environmental Heath should collaborate in the inspection and regulation of working spaces, for the protection of occupational and public health.
- Ensure that the National Insurance Scheme (NIS) data is made available and is used to more effectively develop OSH programmes and other interventions and to help strengthen workplace compliance.

IV. Build capacity to implement effective OSH interventions

The Government will:

- 1. Ensure that the DoL is staffed with a sufficient number of appropriately qualified Health and Safety Officers to properly fulfill its responsibilities under the revised Employment Act, revised Labour Relations Act, the draft OSH Act and this OSH Policy. In particular, the Ministry of Labour should be equipped to undertake routine workplace inspections, conduct required tests and provide advisory services to enterprises.
- Ensure that services provided by the DoL are of a similar standard regardless of geographic location. In this regard, services provided to Carriacou and Petite Martinique should be improved as a priority.
- 3. Build the capacity of other relevant regulatory authorities, to ensure that the requisite support to the DoL can be provided.
- 4. Build the capacity of social partners to ensure the effective implementation of this policy.

V. Train, educate and build awareness

Greater OSH knowledge and awareness will have a positive impact on the number of persons suffering from occupational accidents and diseases. To achieve this objective, the government, in consultation with social partners, will:

- 1. Ensure broad dissemination of the OSH policy.
- 2. Provide continuous training in OSH for Health and Safety Officers, to keep them abreast of OSH requirements.
- 3. Engage in OSH education and advocacy in schools, other learning institutions and via the various media. OSH considerations will be integrated into existing educational programmes in secondary and tertiary institutions.
- 4. Encourage indigenous ingenuity in OSH, starting at the colleges and schools.
- 5. Annually observe World Day for Safety and Health at Work on Apr 28.

Employers, supported by their umbrella associations will:

- Familiarise themselves with the requirements of employers under the legislation, regulations and standards, best practice in their operations, and the repercussions of noncompliance.
- 2. Train workers to ensure they are equipped to undertake assigned tasks safely. In particular, staff require training in the proper use of PPE, and in the handing of dangerous substances and equipment.

Workers, supported by their organizations, will:

1. Participate in training activities and apply their knowledge responsibly, to best protect themselves and others in the workplace.

V. Management Information Systems and OSH Programme Design

The Government will improve the Management Information Systems (MIS) to ensure that data collected better captures the OSH situation in the country, and can be relied upon to inform the development of national OSH programmes, through the following:

- 1. Ensure that all public agencies with a responsibility to collect, manage and share data are equipped to do so.
- 2. Ensure that a system is developed to facilitate sharing of OSH data and other information between agencies.
- 3. Encourage employers to promptly report all work-related accidents and incidents in compliance with OSH legislation.
- Analyse work-related accidents and incidents from all sources to better understand the OSH situation, identify the challenges and priorities, and develop responsive OSH programmes.
- 5. Use data to evaluate the impact of national OSH programmes, and to guide how these should be revised to address changing requirements over time.
- 6. The DoL will develop systems to facilitate public access and contribution to OSH data and other information, respecting the confidentiality of certain types of information.

Assignment of functions and responsibilities of the main stakeholders

The primary duty of OSH provision is on the employer, but stakeholders such as workers, designers, manufacturers and others also have important roles to play. All parties (whether government, private companies or informal workplaces) need to know and understand their roles, to avoid misinterpretation and to protect public health and safety. Key stakeholders and their functions are as follows:

Employers

- Adhere to and implement OSH regulations.
- Create and adhere to OSH policies that are appropriate to their operations. Address environmental issues within their policies if these are facet of operations, noting that environmental impacts are not confined to the work place.
- Maintain a safety management system, including appropriate risk assessment and mitigation practices.
- Develop an OSH manual to guide their employees, to be provided to them at the commencement of employment.
- Consult with workers on health and safety issues.
- Ensure that the workplace has a joint OSH committee (or health and safety representative (HSR) depending on the number of employees) which will maintain communications at the internal level.
- Participate in workplace joint OSH committees or work along with the Health and Safety Representative on OSH related matters.
- Maintain records consistent with legislation and regulations, and report incidents and accidents to the Ministry of Labour
- Provide workers with information, instruction, training and supervision to perform their jobs safely.
- Ensure the protection of the workforce, by providing workers with the appropriate PPE
 to assigned tasks such as reflective safety vests, harnesses or fall protection gears, dust
 masks, gloves, respirator filters, ear muffs for loud equipment, knee pads, rain gear,
 specialized welding gear and include other relevant PPE according to the nature of the
 task.

This is in keeping with the ILO Convention, which states that:

- "Employers shall be required to provide, where necessary, adequate protective clothing and protective equipment to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects on health."(Article 16 of Convention 155, 3.)
- ❖ "The obligations placed upon employers with a view to achieving the objective set forth in Article 16 of the Convention might include, as appropriate for different branches of economic activity and different types of work, the following: ... (e) to provide, without any cost to the worker, adequate personal protective clothing and equipment which are reasonably necessary when hazards cannot be otherwise prevented or controlled;"(Article 10 of the Recommendation 164)

The Grenada Bureau of Standards must ensure that the personal protective equipment(PPE) provided should comply with national law or be in accordance with criteria approved or recognised by the competent authority and based on national or international standards.

- Adapt work conditions and the working environment to suit worker needs and functions.
- Provide workers with safe systems of work including safe equipment and machinery.
- Provide workers with facilities for welfare at work, such as lunch rooms, toilets, first aid kits, etc, which are consistent with legislation and regulations.
- Monitor workers' health through pre-employment health checks and health surveillance
 as part of a workplace wellness programme and with the sole objective of identifying risks
 to health and improve wellbeing among staff.

Employers organizations (*Grenada Employers' Federation, Grenada Chamber of Industry & Commerce and others*) represent employers at the national level, including on the tripartite committee, and keep members abreast of OSH requirements.

Workers

- Cooperate with the employer in their compliance with the OSH Act, regulations or policies.
- Take reasonable care and not recklessly endanger health and safety of themselves or others.
- Elect persons knowledgeable of relevant OSH issues to be their HSR.
- Report health and safety issues, including psychosocial factors and work-related stress, accidents, incidents or near misses to the elected HSR.
- Responsible for PPE that are of a personal nature such as inner-ear plugs, construction safety boots, water boots, respirators, eye goggles and hard hat. For hygienic purposes/concerns, these should not be re-issued to other workers for re-use.
- Develop and practice good habits of hygiene and housekeeping and make proper use of PPE.
- Participate in inspections and accident investigations and be informed of observations and recommendations made by the regulatory authority.
- Must be informed of inherent dangers in work processes and must be provided with appropriate training and PPE.
- Refuse to perform work that they reasonably think exposes them to risk that is serious and imminent without the risk of any punitive action being taken.

Workers organizations (*Grenada Trade Union Council*) have an important role in advocating and promoting a safe and healthy culture. They negotiate with employers and the government on behalf of workers, educate and train workers and support them in their duties within joint OSH committees and as health and safety representative (HSR).

Ministry of Labour

Governments are responsible for drawing up OSH legislation and policies and ensuring that they are implemented. The Government, through the Ministry of Labour and other relevant ministries, will:

- Ensure the maintenance and promotion of worker's health and working capacity. National OSH policies and programmes will be regularly revised to ensure continual improvement. Targets will be set, and indicators monitored.
- Develop and regularly revise and update the OSH legal framework, including OSH regulations, in consultation with social partners.
- Provide OSH leadership, and prioritise OSH at the national level through the promotion of a preventive safety and health culture.
- Set a national OSH policy in consultation with social partners and rationalize the legal framework.
- Finance public sector OSH requirements, to improve the national OSH system and develop and implement national OSH programmes in collaboration with its partners.
- Provide an accountable and transparent OSH inspectorate and ensure coordination amongst its agencies so as to efficiently provide public OSH services, including provision of advisory services to enterprises and support to OSH committees/representatives in enterprises.
- Ensure that the DoL collaborates with other government agencies and the social partners in the surveillance of workplace conditions, the provision of OSH information and implementation of awareness raising activities.
- Develop a system for collecting, recording, storing, retrieving, analyzing, evaluating, reporting, sharing and disseminating information (on occupational accidents and diseases), and for conducting research.

Ministry of Health

The mission of the Ministry of Health of Grenada is to promote and provide health services that are appropriate, accessible, equitable, and sustainable utilizing suitably qualified and motivated staff committed to excellence and professionalism. The Ministry of Health will support the Ministry of Labour in health promotion at the workplace in the following areas:

• Workers' health surveillance and working environment surveillance to identify abnormalities and asses environmental factors that might affect workers' health.

- Health education and health promotion at work by the practice of good personal hygiene and routine physical exercise, good environmental health practices, eating a balanced diet and getting adequate sleep; the cessation of smoking, excessive alcohol consumption, drug abuse, promiscuity, stress, anger, violence and avoidance of other behaviors which are detrimental to life.
- Employment of occupational health practitioners who will establish services in relation to occupational medicine, industrial hygiene, occupational therapy, ergonomics, and psychology, and improve the capability for diagnosis of occupational diseases and identify risk factors.

National Insurance Scheme (NIS)

The NIS will:

- Manage employment injury benefits in accordance with statutory requirements.
- Inform the DoL of any unsafe or unhealthy working conditions they may observe on routine inspection and visits to workplaces.
- Collaborate in public awareness and educational programmes and OSH activities, including the organization of seminars and lectures, in collaboration with DoL, to sensitize workers employers on employment injury benefits.
- Share with the DoL data on employment injury benefits.
- Establish and maintain a communication channel with the Ministries of Labour and Health.

Ministry of Finance

The Ministry of Finance will allocate resources to the Ministries of Labour and Health, as well as to other Government agencies, to implement this policy, through the allocation of resources in the approved Annual Estimates of Revenue and Expenditure.

The Ministry of Finance will also play a monitoring and evaluation role for the implementation of projects vis a vie the drawdown of the resources provided.

Ministry of Education/National Training Agency

- Mainstream OSH-related education in the curricula of schools, training institutions and universities, including CVQ as appropriate.
- Collaborate with the DoL in setting objectives for mainstreaming OSH into education and in providing professional development in risk education for teachers and trainers.

Fire Department – Royal Grenada Police Force

The services of the Royal Grenada Fire Service will be of paramount importance in implementing this policy. The services will include:

- Written fire prevention and protection policies and programmes in all workplaces for the safety of all workers.
- Workplace inspections for the issuance of compliance certificates to establishments.
- Ensuring proper installation of sprinkler systems and smoke detectors as well as fire extinguishers and fire escapes.
- Training of workers in the efficient use of fire extinguishers and other fire prevention equipment, and in the maintenance of alarms and sprinklers, as well as the procedures to follow in the event of a fire in the workplace.
- Distribution of fire prevention posters, flyers and warnings and direction signs and placing them in strategic locations.
- Ensure that new and remodeled buildings meet fire safety standards, and that all building owners maintain required fire safety equipment.

Physical Development Division – Ministry of Finance, Economic Development and Physical Development

Collaborate with the DoL to ensure that existing, new and remodeled buildings meet planning standards related to Grenada's OSH.

Bureau of Standards

The Bureau of Standards will elaborate, modify and amend specifications, standards and codes of practice related to safety equipment, machinery, and PPE. It will also collaborate in education programmes and public awareness campaigns in OSH.

Governance, evaluation and review of the policy

The formulation of this policy followed a participatory approach in which social partners and other relevant stakeholders provided inputs for its development. The policy, while being consistent with other national policies and priorities, seeks to promote the right of workers to decent, safe and healthy working conditions and environment. The OSH Policy will be supported by an OSH Programme which will include priorities, objectives and targets to achieve the objectives of this policy.

The implementation of this policy demands effective coordination between the various authorities and bodies designated to implement the policy, as well as with social partners. The establishment of a tripartite committee on OSH will create a forum for discussion and advise the Ministry of Labour in the implementation of the policy. It will also promote inter-sectoral cooperation with relevant stakeholders and consider the revision of the policy. The committee will monitor and evaluate progress towards the achievement of the objectives of this policy.

The OSH policy shall be revised every 5 years or as deemed necessary based on changes in:

- a. Legislation
- b. Technology
- c. International standards and Conventions and/or
- d. Any other conditions that may warrant review.

Ensure the protection of the workforce, by providing workers with the **appropriate** PPE to assigned tasks such as reflective safety vests, harnesses or fall protection gears, dust masks, gloves, respirator filters, ear muffs for loud equipment, knee pads, rain gear, specialized welding gear and include other relevant PPE according to the nature of the task.

This is in keeping with the ILO Convention, which states that:

- "Employers shall be required to provide, where necessary, adequate protective clothing and protective equipment to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects on health." (Article 16 of Convention 155, 3.)
- "The obligations placed upon employers with a view to achieving the objective set forth in Article 16 of the Convention might include, as appropriate for different branches of economic activity and different types of work, the following: ... (e) to provide, without any cost to the worker, adequate personal protective clothing and equipment which are reasonably necessary when hazards cannot be otherwise prevented or controlled." (Article 10 of the Recommendation 164)

The Grenada Bureau of Standards must ensure that the personal protective equipment(PPE) provided should comply with national law or be in accordance with criteria approved or recognised by the competent authority and based on national or international standards.