
LABOUR MANAGEMENT PROCEDURE

Solomon Islands Agriculture and Rural Transformation Project (P173043)

Prepared by the Ministry of Agriculture and Livestock
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1 INTRODUCTION

1. The Solomon Islands Agriculture and Rural Transformation Project hereafter referred to as "the Project" has applied for IDA fund. The project addresses the environmental and social aspects through the World Bank's Environmental and Social Framework (ESF) and Environmental and Social Stands (ESSs).
2. The Ministry of Agriculture and Livestock (MAL) has prepared this labour management procedure (LMP) to meet the ESS2 requirements on relates to Labour and Working Conditions. The purpose of the LMP is to identify the main labour requirements and risks associated with the project and help the Borrower to determine the resources necessary to address project labour issues. The LMP will enable different project-related parties, for example, staff of the project management unit (PMU), contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labour issue.
3. The LMP will comply with relevant national laws, regulations and standards for labour and working conditions and the World Bank's ESS2, and where there are differences the more stringent provisions will be applied. The LMP is a living document initiated early in the project preparation and is reviewed and updated throughout the development and implementation of the project.
4. MAL/PMU is responsible for the management and supervision of LMP and the overall project implementation. The following sections provide a detailed description of the type and number of workers to be engaged throughout the project life.
5. The LMP has 11 chapters. Chapter 1 served as Introduction. An overview of labour use in the project is presented in Chapter 2. Key potential labour risks are listed in Chapter 3. Legislative Framework governing labour employment is discussed in Chapters 4 and 5. Implementation Arrangements, Age Requirement, Policies and Procedures and Timing of labour requirements follows in the subsequent chapters. Grievance Redressal Mechanism and Contractor Management are presented in the last two chapters 9 and 10 respectively, while Chapter 11 relates to primary supply workers.

2 OVERVIEW ON LABOUR USE ON THE PROJECT

2.1 Type of workers

6. ESS2 categorises the workers into direct workers, contracted workers, community workers and primary supply workers. The project's workforce will include direct workers (directly employed by *PMU under the guidance of MAL*, contracted workers (recruited by third parties such as contractors or as consultants), community workers, and primary supply workers.
7. MAL/PMU will be staffed and equipped to enable it to carry out the project activities effectively. Component 3 of the Project will finance contractual/incremental staff, consultants, operating costs, technical assistance (TA), training, monitoring and evaluation (M&E) activities, baseline and final impact assessments, information dissemination, grievance redress mechanism, and annual audits. The project aims that at least half (50%) of all project-funded professional positions such as MAL/PMU staff including young professionals are women. See also MAL's Organization Structure in the PAD.

2.1.1 Direct workers

8. Direct workers refer to staff assigned by MAL and Consultant service providers, including the E&S consultants working for the ART Project. Some MAL staff both from the Honiara HQ and those based in the provinces will also be involved in the project activities as required this includes extension, research, livestock, planning and possibly biosecurity staff. The direct workers include staff assigned to the MAL/PMU and workers who are directly employed by the MAL/PMU as described below:

- a national Sector Coordinator at Director level
- three provincial coordinators of the three targeted provinces.
- an Accountant to report to and work with the FM Officer,
- a Procurement Assistant to report to and work with Procurement Officer; and (vii) support staff (a Secretary and a Driver).
- Others

9. The Consultant service providers who will provide implementation support services to the implementing agency, MAL. Consultant service providers can include:

- six Officers for Financial Management, Procurement, Monitoring & Evaluation, Environment Safeguard and Social Safeguard, and Communications.
- short-term International Advisor to support the overall project implementation;
- an Agricultural Production Specialist in charge of monitoring and supervising the project implementation;
- an Agri-business Specialist in charge of monitoring and supervising the project implementation;
- an Institutional Development Specialist, working alongside the International Advisor;
- Two individual Environmental, Social and Health and Safety and Community Engagement Consultants: one consultant for the social aspect and another one for the environmental aspect shall be retained on an as-required basis. An alternative is one part-time international Environmental, Social and Health and Safety Consultant/Specialist shall be retained on an as-required basis.

10. The timing of labour requirements is from the project preparation to the completion of the project.

2.1.2 Contracted workers

11. The contracted workers are construction workers hired by contractors or workers of civil works contractors ¹to be subcontracted to arrange for small civil works under the project implementation. The staff of civil works contractors will be likely limited depending on the scale of the individual productive Infrastructure and small Infrastructure required under each component. *The timing of labour requirements will be stable and not fluctuate throughout the project period. The experience of RDP II indicates that the contractors will engage approximately 5-10 workers for each small Infrastructure, and 10-15 workers for feeder road or footpath.*

2.1.3 Primary supply workers

12. Primary Suppliers for any civil works to be supported by the project. They include local suppliers of construction materials such as aggregates, timber, hardware material (cement, roofing iron, nails) or equipment (e.g., storage and related machinery, packaging materials and machinery, etc.)
13. The small construction work under the project will require primary supplies essential for the functions of the priority infrastructure. Where the contractor will source such materials directly from primary suppliers on an ongoing basis, the workers engaged by such primary suppliers are deemed "primary supply workers", as defined in ESS2. The number and type of primary suppliers will be determined at the project implementation stage. The timing of labour use of primary supply workers will cover the construction stage of the Project (see Section 11 for more details on primary supply workers).

2.1.4 Community workers

14. **Community workers** include community members, members of the producer organisations (POs), farmers, women-led farmers, and/or project beneficiaries who are mobilized by MAL provincial team or local contractors) for example, for community works, whether paid or unpaid. Annex 1 an ESS2 provisions are to be applied to community workers, providing labour voluntarily. While applying Annex 1 an ESS2 provisions to community workers, MAL/PMU will pay specific attention to sensitization and training of community workers on OHS risks, and the technical knowledge and behavioral awareness to minimize the risks. Project travel safety procedures will be emphasized, and the project will fund all necessary safety equipment associated with project travel, including vessels if necessary. MAL/PMU within MAL will be equipped with strict travel regulation especially in server weather conditions and appropriate safety equipment for example: life jackets, first aid kit and radio phone to reduce the risk of any incident occurring during the travel to the provinces. The following types of the task will be considered for community works under the ART project:

- Producer organisations (POs), Community organisation and educational tasks undertaken by individual community members voluntarily and without a formal contract or remuneration from project funds (except for expenses);
- Work carried out by community members on agriculture or livestock demonstration under the direction and supervision of project staff or consultants (e.g. demonstrations or farmer field school group learning through practical demonstrations);
- Community works including earthworks, grass planting, tree planting, minor to small construction etc. where EITHER the work is unpaid, OR any payment in cash or kind is directly from MAL and not from a contractor. MAL provincial staff will directly recruit or engage community people for any activities related to the community works.

15. Community Workers under the age of 18 will not be employed by the project or for the project purpose, as required in the World Bank ESS2. See also age of employment in Section 7. The community workers will have no role in the procurement and management of any contracts. Local farmers or residents may be hired as employees by civil works contractors, for example, for small infrastructure work. In this case, the contractors will respect the terms and conditions covered under the national Labour Acts and Safety at World Act 1996 and defined under the World Bank ESS2, detailed in Section 4 on Labour Legislation of this LMP.

2.2 Number of workers

16. Based on the experience in RDP II and the current workforce of MAL experienced, the project's direct workers include staff designated by and consultants hired by MAL and community members are female workers including any persons with disabilities, small-stock producers, and members of Pos who are lodging in the project areas. See more details about number of the different project workers and the indicative number of workers in Table 1.

Table 1: Estimated number of workers by categories

Type of project workers	Characteristics of project workers	Timing of labour requirements	Indicative number of workers
<p>Direct workers</p> <ul style="list-style-type: none"> ○ MAL/PMU staff 	<ul style="list-style-type: none"> ○ National experts and national technical permanent staff (20) ○ provincial technical permanent staff including extension officers (30) ○ International experts/consultants and national experts/consultants (15) ○ Young Professionals from FAFF, SINU to fill vacant positions in extension (40) 	<ul style="list-style-type: none"> ○ From project preparation until project completion 	<ul style="list-style-type: none"> ○ Approx. 105 Total:
<p>Contracted workers¹</p>	<ul style="list-style-type: none"> ○ workers of civil works contractors (100) 	<ul style="list-style-type: none"> ○ From the early stage of project implementation until project completion ○ The timing of labour requirement will fluctuate, dependent on <i>the construction stages, which will be determined by individual contractors at the contract award stage.</i> 	<ul style="list-style-type: none"> ○ Contractors' workers: 50 Total: 155
<p>Primary supply workers</p> <ul style="list-style-type: none"> ○ Workers engaged by primary suppliers (construction materials such as gravel, timber, or cement) 	<ul style="list-style-type: none"> ○ They are most likely local suppliers/workers. 	<ul style="list-style-type: none"> ○ The construction stage ○ 	<ul style="list-style-type: none"> ○ The primary supply workers will be identified during the project implementation stage expected: approx. 300 Total: 300
<p>Community workers (see also subsection 2.1.4)</p>	<ul style="list-style-type: none"> - community members, female workers, members of the producer organisations (POs), farmers, persons with disabilities, women-led farmers, and/or project beneficiaries who are engaged in community labour whether paid or unpaid. ESS2 provisions are to be applied to community workers, providing labour voluntarily. - village small-stock producers/beneficiaries. Members of POs (3*8000) 	<p>From the early stage of project implementation until project completion</p>	<p>Community workers: 3,000</p>
<p>Grand total:</p>			<p>3,400</p>

2.3 Timing of Labour Requirements

17. The direct workers will be required full time and around the year for the project duration. Consultant Services workers will be required full time or on an intermittent basis for the project duration. It will be up to the contractors to mobilise labour force to coincide with the type of works and the season. *Contracted workers (e.g. community extension workers) for Agriculture and Livestock Production can be required on a full-time or intermittent basis for the project duration.*

3 ASSESSMENT OF KEY POTENTIAL LABOUR RISKS ACTIVITIES

3.1 Project activities

18. The indicative project components and activities to be carried out by the project workers are the following:

- **Component 3.** Project Management incurs more positive environmental and social impacts, delivering several environmental, social, safety, and health benefits such as access to acceptable agronomic and animal husbandry practices in the industry, promotion of organic farming and integrated pest management (IPM).
- **Component 4.** Emergency Response and Disaster Recovery (US\$ 0) will be screened and confirmed if the government requested fund transfer for Disaster Recovery during the course of project implementation.
- **Components 1 and 2** can be clustered into the three typologies: (i) Productive Infrastructure and small infrastructures such as provincial offices, field experiments stations; (ii) agricultural and livestock improvement including agronomic practices, processing; livestock breeding, and husbandry practices; and (iii) technical assistance and capacity building for Business Planning, agribusiness partnership, and product branding. The types of intervention and structure under Components 1 and 2, which can be categorised as:
 - Productive Infrastructure and small physical Infrastructure such as:
 - Construction of MAL training center and pig breed improvement facility,
 - Upgrading MAL Research Headquarter,
 - Construction of a market and storage facility in Kira-Kira, Makira,
 - construction or upgrading of pig and poultry sheds and night shelter; poultry nest-boxes to improve egg hatching rates and reduce chick mortality; small-scale poultry hatcheries; pig farrowing crates to reduce piglet mortality,
 - rehabilitation or construction of existing/new offices,
 - hygienic slaughter with the construction of pig slaughter slabs, to be located in strategic pig production areas, to facilitate the hygienic off-the-ground slaughter,
 - agriculture processing, feed mills, cocoa fermentries, dryers,
 - Agricultural and livestock production, farming, and product processing include:
 - seeds, planting materials and harvesting tools for the production of feed crops; insect-protein feed production equipment,
 - stock, day-old chickens, breeding stock,
 - chicken and pig feeds will be formulated by piloting feed producing units using locally available materials,

- Technical assistance and capacity building to POs on basic protocols, standard operating procedures, financial management and business plan; and to farmers through Community Resource Persons (CRPs) and agri-business partners. Technical assistance and support can include:
- Agricultural Production and Agribusiness Grants to nurture and strengthen Producer Organisations (POs),
- Capacity Building and Extension service training during pre-production, production, processing, value addition, transportation, and marketing,
- Working Capital cost for Productive infrastructure/tools/equipment,
- repair and maintenance of machinery such as DME unit, Coconut oil mill, cocoa drier, etc. will be borne by the Producer Organisation,
- Training of Trainers (ToTs) for Extension Staff in MAL, Training of Community Resource Persons (CRPs), Training of participating farmers or PO members, training of YP and interns.

19. While types, sources and causes of the project impacts will be further screened and assessed during the project implementation, potential environment, health and safety concerns associated with Components 1 and 2 are expected to be temporary, site-specific, localised, and readily managed through the ESMF.

3.2 Lessons learnt from RDP II

20. Component 2 of RDP and RDP II projects have a broadly similar scope of activities and labour-management issues as are expected in the ART project. **There have been no reports of child labour either in project** reporting (though it is not clear that specific monitoring took place) or in discussions with focus groups and individual community members at subproject sites.
21. The labour management procedure applied in the RDP II, both for direct project workers and for contracted workers, do not fully meet the requirements of ESS2. There has been no systematic monitoring of the issue, and consequently, only limited lessons can be learned. For example, project worker labour-management issues are not discussed in the progress and Mid-Term Review reports.
22. Basic human resources procedures applicable to direct project workers in the Project Implementation Manual (PIM) of RDP II do not include references to workers' rights, occupational health and safety (OHS) or a specific worker's grievance mechanism. Labour management requirements for contractors are limited to very general provisions in standard contract documents and are not systematically monitored. As an example of improved practice, it is noted that a code of conduct for child labour and forced labour in works contracts.
23. Labour hire and management procedures of contractors, particularly for construction works, are fairly informal. It is observed that OHS standards, particularly provision and use of personal protection equipment (PPE), provision of safe scaffolding, etc., are not enforced at small infrastructure sites.
24. Most works of small Infrastructure involve a relatively small number of the labour force which is brought to the site by the contractor (and may therefore be resident at the site while works are in progress). For some tasks, for example, making nest boxes can be contracted out the farmers would make them. The farmers would probably also do the construction of poultry sheds, pig houses and even the storage sheds themselves. Some works at the provincial or community level were also carried out by community labour with payments in cash and rice. In both situations, women and men received equal pay and more women than men were employed.

3.3 Key labour risks

25. Drawing upon the experience and lessons learned from RDP and RDP II, Labour risks would be associated with health and safety risks related to the travel, construction of agricultural production and rehabilitation of infrastructures such as exposure to physical, chemical and biological hazards, trip and fall, exposure to noise and dust, falling objects, exposure to hazardous materials and exposure to from the use of tools and machinery moving parts.
26. Small Infrastructure can pose some pollution and other adverse environmental impacts. Pollution may arise from mishandling or inappropriate disposal of oils, cement, and waste management. The project activities could contaminate water sources with poor drainage and management of stormwater. Construction works may result in dust nuisance and, in some cases, minor health injuries to community members. Also, poor design of Infrastructure or poor practice during construction may lead to damage to natural drainage channels and soil erosion.
27. Agricultural and livestock production can pose impacts on workers and community health and safety, particularly with regards to proper and safe use and handling of livestock, pesticides and chemical fertilisers. In general, the activities and investments under this typology are not expected to involve the widespread purchase and distribution of pesticides or related application equipment, and they are not expected to result in a significant increase in pesticide use. Lessons learnt from RDP II show that much of agriculture and livestock practices are of low intensity, and only some smallholder farmers use only limited quantities of approved chemicals or fertilisers. Besides, the project aims to further strengthen the implementation of integrated pest management strategies.
28. As discussed in the ESRS, workers employed by contractors and suppliers, who are unlikely familiar with core provisions for labour and working condition risk management aligned with ESS2. Labour risks are related to possible accidents or incidents, potential worker lay-off or position transition with the input production and processing facilities, and relatively weak labour law enforcement for seasonal workers at production bases.
29. Labour risks and special attention will be given to safe travel procedure and awareness-raising to the project workers, following the safety incident in the RDP II Project. Under the project, staff can frequently expose safety risks when they are required to travel to and within the targeted provinces in most cases through a mode of the boat or small aircraft. The dedicated management unit within MAL will be equipped with appropriate safety equipment, for example, strict travel regulation especially server weather conditions, life jackets, first aid kit, GPS tool, and radiophone to reduce the risk of any incident occurring during the travel to the provinces.
30. Drawing upon the experience and lessons learned from the RDP II, the following are key labour risks anticipated and assessed during the implementation of the project.
 - **Occupational health and safety (OHS) risks:** Occupational Health and Safety (OHS) measures will apply to all project workers, including contractors and subcontractors, community workers, community labour and primary suppliers. Specific attention will be given to sensitisation and training of community workers on OHS risks, and the technical knowledge and behavioural awareness to minimise them. Project travel safety procedures will be emphasised, and the project will fund all necessary safety equipment associated with project travel, including vessels if necessary.

- Many workers will be exposed to occupational health and safety hazards², including but not limited to:
- **(1) Lack of awareness on occupational health and safety requirements:** As it is common at a worksite, there is often a lack of use of personal protective equipment (PPE) and safe workplace practices. Materials for handwashing and hygiene and masks are often not provided at work sites.
- **(2) Child labour:** Even if it is forbidden to hire child, the risk of engaging under-aged children in the project activities will require particular attention. Contractors and suppliers may tend to use children for economic reasons and convenience.
- **(3) Labour influx:** While labour influx could also increase the risk of Gender-Based Violence (GBV). Due to the project typologies and availability of labour supply the three targeted provinces, labour influx is not expected.
- **(4) Labour disputes over terms and conditions of employment:** Labour disputes can include demand for limited employment opportunities; labour wages rates and delays of payment; disagreement over working conditions; and health and safety concerns in the work environment. In turn, there is also a risk that employers such as contractors may retaliate against workers for demanding legitimate working conditions, or raising concerns regarding unsafe or unhealthy work situations, or any grievances raised, and such situations could lead to labour unrest.
- **(5) Discrimination and exclusion of vulnerable/disadvantaged groups:** Vulnerable/disadvantaged groups of people may be subject to increased risk of exclusion from employment opportunities under the project. Such groups will include women and persons with disabilities. Lack of equal pay for equal work for men and women is also an issue in the country. Sexual harassment and other forms of abusive behaviour by workers will also have the potential to compromise the safety and wellbeing of the vulnerable groups of workers and the local communities, while adversely affecting project performance. This will also include potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported under the project.

31. The labour risks are assessed to below as the project will follow the good international industry practice, as reflected in various internationally recognised sources including the World Bank Group Environmental, Health and Safety Guidelines, the project will address areas that include the (i) identification of potential hazards to workers, particularly those that may be life-threatening; (ii) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) workers and contractors will be trained on labour safety, traffic safety, sanitation before starting any civil works; (iv) documentation and reporting of occupational accidents, diseases, and incidents; and (v) emergency prevention, preparedness, and response arrangements. See the capacity building plan proposed in the ESCP and ESMF.

4 BRIEF OVERVIEW OF LABOUR LEGISLATION: LABOUR TERMS AND CONDITIONS

4.1 National LABOUR LEGISLATION

32. Solomon Islands has ratified the following fundamental conventions of ILO:

- Forced Labour Convention (No.29) (ratified in 1960)
- Freedom of Association and Protection of the Right of Organize Convention (No. 87) (ratified in 2014)

² Exposure to chemicals (as paints, solvents, pesticides, chemical fertilizers). Potentially any of above risks.

- Right to Organise and Collective Bargaining Convention (No.98) (ratified in 2014)
- Abolition of Forced Labour Conventions (No. 105) (ratified in 2014)
- Discrimination (Employment and Occupation) Convention (No. 111) (ratified in 1961)
- Worst Forms of Child Labour Convention (No. 182) (ratified in 2014)
- An employers' guide on managing your workplace during COVID-19 (2020)

33. The workers in the Solomon Islands are also managed and protected under the below national labour and work safety acts.

4.1.1 Labour Acts

- **The Labour Act 1978** deals with protections for workers. Part IX Care of Workers requires the employer to: provide workers with rations (Article 65); protect workers and dependents from malaria (Article 66); provide workers with an accessible supply of clean, non-polluted water for drinking, washing and other domestic purposes (Article 67); make sufficient and proper sanitary arrangements for workers (Article 68); provide accommodation for the worker and family if they are not conveniently located to the workplace (Article 69).
- Article 70 requires the employer to provide medical care at the workplace including (i) treatment facilities, medicines, first aid equipment and transportation facilities; (ii) responsibility to move workers as quickly as possible either to the employer's treatment facilities or to the nearest medical facilities; (iii) treatment for workers or hospitalisation; and (iv) should a worker die the employer is obliged to pay for funeral costs. Article 71 states that the employer may be required to provide medical facilities and services of a medical practitioner, and the employer is to maintain a register of workers treated.
- **The LABOUR ACT (1996)** CHAPTER 73 governs rules relating to employment. The Act defines the allowable hours of work and minimum wages. It outlines workers rights and employers penalties for not complying with the requirements. It includes a prohibition for women working at night and for child labour.

34. As noted in the community consultation section, there were concerns, in relation to women working out of daylight hours and the project attempts to enforce this rule. In line with the Act and for safety reasons, night work should not be permitted. Besides, the project should maintain the requirement for all workers to be over the age of 16 years of age.

4.1.2 Safety at Work Act 1996

35. This Act states that every employer must provide a safe workplace and to ensure the health and safety of employees under his control. This Act is linked to the Labour Act (1978) and the Safety at Work (pesticide Regulations (1983). This Act consists of 4 parts.

- Part II: Article 4 states that every employer must ensure the health and safety at work of his employees.
- Article 6: states that the employer must provide a safe workplace for persons other than his employees.
- Articles 7 and 8: requires manufacturers, suppliers of tools and equipment and suppliers of chemicals and other hazardous substances to ensure that these are safe and without health risks.
- Article 12: states that any employer who operates unsafe machinery or substances and is injured will be responsible for the damages.
- Part III: Article 15 requires the employer to protect people from dust, fumes, etc. Article 16 provides for limits of exposure to dust and fumes.

- Articles 17, 18, 19 and 20 require employers to comply with the operating requirements for (i) pressure and vacuum systems; (ii) machinery; (iii) dangerous machinery; and (iv) electrical installations.
- Articles 21 and 22 require workplaces to have fire protection and to take precautions against explosions.

4.2 Requirements of ESS 2

36. The requirements of ESS2 cover the following areas: (a) working conditions and management of worker relationships; (b) protecting the workforce; (c) workers' access to a grievance redress mechanism; and (d) Occupational Health and Safety (OHS) measures.

37. Working conditions and management of worker relationships include requirements that:

- Project workers are provided with clear terms and conditions of employment, consistent with national legal requirements;
- The principles of non-discrimination and equal opportunity are applied to project workers, and vulnerable project workers are protected;
- The rights of workers to form workers organisations, consistent with national law, are respected.

38. Protecting the workforce requirements include:

- Provisions to prevent the employment of children below the age of 14 or the national legal minimum, whichever is higher, and restrictions on the employment of children under 18;
- Prevention of forced labour.
- Direct and contracted workers must have access to a grievance mechanism. The grievance mechanism for contracted workers must be provided by the direct employer and is separate from the project grievance mechanism.

39. OHS requirements must address:

- Identification of potential hazards to project workers, particularly those that may be life-threatening;
- Provision of preventative and protective measures, including modification, substitution or elimination of hazardous conditions or substances;
- Training of project workers and maintenance of training records;
- Documentation and reporting of occupational accidents, diseases and incidents;
- Emergency prevention preparedness and response arrangements to emergencies; and
- Remedies for adverse impacts, including occupational injuries, deaths, disabilities and disease.

4.3 Gap analysis and Measures

40. It should be noted that common employment practice in the country frequently varies from the provisions of the Labour Law, which are not widely known or understood outside certain sectors such as the agricultural industry. For example, OHS measures are not linked to bidding documents to make it a contractual obligation for contractors. Other gaps between the common practice of the national labour legislation and the World Bank ESS2 requirements can include:

- No clear enforcement mechanism for the existing rules on non-discrimination and equal opportunity. It is not clear that quotas for the employment of people with disabilities are set as required by the law and / or enforced in practice;
- Although the law guarantees workers' rights to unionise, labour unions are prominent in the public sector but not common in other sectors;
- Employment of children working alongside parents in agricultural labour is known to occur. There are persistent allegations that this is also a common practice in prohibiting child labour and forced labour, heightened focus on OHS, grievance mechanisms.
- Enforcement of safety standards is weak, especially in informal sectors and in the construction industry;
- Despite employers' legal liability for workplace accidents, no construction workers insured.

41. Therefore, project measures will need to make good the gaps between Labour Law and ESS2, but also include measures to enforce compliance with Labour Law requirements where these are consistent with ESS2. Furthermore, when there are differences between national Labour Law and ESS2, the more stringent provisions will be applied. Annex 3 outlines these project measures. Annex 3 provides more information about gaps between common practice and ESS2 requirements, including terms and conditions of employment.

5 RESPONSIBLE STAFF

5.1 Tasks and Responsibilities

42. As discussed in the PAD, the Ministry of Agriculture and Livestock (MAL) staff have some experience in working with the Bank's operations and applying the safeguards policies through their role in implementing the Rural Development Program II (P149282). However, much more capacity building is required for MAL to implement this ESF effectively. *The project will make use of two national E&S consultants (and maybe a short-term international consultant) to enhance implementation capacity of MAL and to provide specific technical inputs and training sessions to the project and its target beneficiaries.* In other words, the MAL/PMU will hire two consultants with expertise in environmental, social, occupational health and safety. The project presents additional challenges, including adjusting to the new ESF requirements. MAL has the knowledge and some capacity to regulate agriculture-related environmental and social risk management, including the formation and regular convening of a Pesticide Registration Advisory Committee (PRAC) to regulate the use of pesticides. However, MAL has relied on external consultants for operational support.

43. The MAL/PMU will be responsible for overall project management and coordination, including compliance with labour and working conditions in the LMP. As outlined in the ESCP, the MAL/PMU will be responsible for the following tasks relevant to labour and working conditions:

- Undertake the overall implementation of this LMP.
- Engage and manage contractors/subcontractors in accordance with these LMP and the applicable Procurement Documents.
- Ensure that contractors prepare their labour management plan (Contractor's LMP), if required by the environmental and social screening and assessment, that comply with this LMP for approval before the contractor is allowed to mobilise to the field.
- Monitor that the contractor is meeting obligations towards contracted and sub-contracted workers as included in the General Conditions of Contract the World Bank Standard Bidding Documents, and align with ESS2 and national labour code

- Monitor³ that contractors/subcontractors are meeting obligations towards contracted workers as included in the Contractor's LMP and the applicable Procurement Documents.
- Monitor the potential risks of child labour, forced labour and severe safety issues concerning primary supply workers.
- Monitor training of relevant project workers.
- Ensure that the grievance mechanism for project workers is established and implemented and that workers are informed of it.
- Monitor the implementation of the Worker Code of Conduct and any other measures to address risks of sexual exploitation and abuse (SEA)/sexual harassment (SH).
- Report to the World Bank on labour and occupational health and safety performance.

44. The contractor will be responsible for the following:

- Employ or appoint qualified environmental, social, occupational health and safety expert(s) to manage OHS issues even for small infrastructure work.
- Prepare and implement their labour management plan (Contractor's LMP)⁴ if needed and through consultation with MAL's provincial extension officer. These procedures and plans will be submitted to the MAL/PMU for review and approval before the contractor is allowed to mobilise to the field.
- Supervise their subcontractors' adherence to the LMP.
- Maintain records of recruitment and employment of contracted workers (including subcontractors) with age verification to avoid child labour.
- Provide induction and regular training to contracted workers on environmental, social and occupational health and safety issues.
- Require the primary supplier to identify and address risks of child labour, forced labour and severe safety issues, and risks of equity and discrimination for primary supply workers.
- Develop and implement the grievance mechanism for contracted workers, including ensuring that grievances received from their contracted workers, resolved promptly, and reporting the status of grievances and resolutions.
- Ensure that all contractor and subcontractor workers and community workers understand and sign the Code of Conduct (see Annex 1) before the commencement of works, take all other measures to address risks of sexual exploitation and abuse (SEA)/sexual harassment (SH) as specified in the contractor's LMP and supervise compliance with such measures.
- Report to MAL/PMU on labour and occupational health and safety performance.

³ The MAL shall establish resources and procedures for managing and monitoring the performance of the contractor in relation to the LMP. The MAL will ensure that the contract with the construction and supervision consultants explicitly set out their monitoring responsibility for the contractor's performance on labour and working conditions on a daily basis. The monitoring may include, inspections, and/or spot checks of project locations or work sites and/or of labour management records and reports compiled by the contractor.

⁴ The Contractor's LMP and the Contractor's ESMP or ESHS may be prepared as separate documents or integrated into a single document.

Table 2: Summary of the project staff/party responsible for various key issues

Key issues	Direct workers	Contracted workers	Primary supply workers
Hiring and managing individual project workers	- MAL/PMU/MAL/PMU manage and supervise Construction.	- Contractor/Subcontractor (site manager and/or OHS officer)	- n/a (outside the scope of ESS2)
OHS	- direct workers will follow OHS measures when visiting construction sites		- Contractor to require the primary supplier to identify/address child labour/forced labour and serious safety risks.
Child labour and forced labour	- the contract for direct workers does not allow child labour and forced labour		- MAL/PMU/Construction and Supervision consultants to review
Training	- MAL/PMU/Construction and Supervision consultants		- n/a (outside the scope of ESS2)
Code of conduct	- the contract for direct workers will address relevant risks.		
Grievance mechanism	- MAL/PMU/Construction and Supervision consultants	- Contractor and MAL/PMU/Construction and Supervision consultants	
Monitoring and reporting	- MAL/PMU/Construction and Supervision consultants to monitor and report to World Bank	- Contractor to monitor and report to MAL/PMU - MAL/PMU/Construction and Supervision consultant to monitor and report to World Bank	- Contractor to monitor and report to MAL/PMU - MAL/PMU/Construction and Supervision consultant to monitor and report to the World Bank.

5.2 Monitoring and reporting

45. MAL will monitor implementation of the LMP and systematically report on activities and outcomes in a dedicated section of the periodic and annual project reports.

46. Reporting will include:

- Awareness-raising materials produced and training undertaken;
- Outcomes of recruitment of direct project workers by age group, gender and ethnicity;
- Records of the project direct worker grievance mechanism;
- Records of occupational health and safety incidents. These are to be systematically recorded in a standard format including (1) type of incident; (2) severity class of incident (major, moderate, minor); incident classification (e.g. fatality, illness, medical treatment, etc.), and notification timeframe (e.g. Immediately, within 24 hours, etc.).

5.3 Capacity Building and Training

47. Lessons learned from RDP II suggest that E&S capacity and performance varies among provinces where the availability of resources is found to be limited. Under RDPII, an external E&S safeguards specialist was hired for screening and resolving safeguard issues both before a sub-project being included in the program and during sub-project implementation. Weaknesses noted in the implementation of the safeguard under the RDP II include, but not limited to, no proactive analysis of potential E&S risks beyond the procedures and insufficient monitoring and reporting of E&S issues as part of the project operations. The transition to the ESF will require MAL and project staff at all levels, including contractors and suppliers, to develop a broad understanding of the ESF approach including the proportionality concept and adaptive management of E&S risks. It will also require the development of specific capacity concerning ESS2 requirements.
48. The provisions outlined in the LMP considerably exceed actual practice in labour management in the Solomon Islands. It must be anticipated that local construction contractors will find it challenging to meet these obligations. The project has allocated resources and budget (see the ESMF) to develop and deliver a short training course for contractors and / or contractors site managers, explaining the obligations of the contractor as set out in the ESHS Specifications. Labour issues can be provided separately or as part of the E&S training or meetings.
49. Farmers in the communities are using or will potentially use agrochemicals; it will be confusing to them if they don't use them or may encourage them to think that they need to use agrochemicals. For precautionary risk management approach, the project will develop and deliver training and simple awareness-raising materials, for example, on environmental risk management, including managing natural effluent from livestock or processing units, etc.. Furthermore, outreach, training and capacity building for farmers, POs and other participating communities will include safe use and handling of all agrochemicals, including pesticides, chemical fertilisers and soil amendments, agricultural discharge to surface water through runoff of pesticides, chemical fertilisers and manure.

6 POLICIES AND PROCEDURES

50. As discussed in the ESCP, the project will ensure that all tender documents for Infrastructure include budget provisions for all OHS provisions as well as other costs associated with labour management (e.g. the operation of a grievance redress mechanism). The project will regularly monitor the contractor's performance in implementing OHS measures. Project's regular reporting system should include the project's performance on the OHS implementation.
51. Following ESS2 and national law, due to the hazardous work situation (use of machinery and pesticides), children under the age of 18 will not be allowed to work on the project. The use of forced labour or conscripted labour on the project is also prohibited. The LMP will include a grievance mechanism (GM) which will be provided to all workers, especially throughout the value-chain, and measures will be in place for all workers (including contractors) to access the GM to raise any concerns related to the project.
52. The project will apply the following policies and procedures to address the key labour risks identified under Chapter 3. The summary of indicative procedures to implement the policies is presented in Table 3.
 - **Occupational health and safety (OHS):**
 - As discussed in ESS2 of the ESRS, the OHS measures will be designed and implemented to address: (a) identification of potential hazards to project workers; (b) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements

to emergencies; and (f) remedies for adverse impacts such as occupational injuries, disability and disease.

- According to the ESS2, the WB General Environmental, Health and Safety Guidelines (EHSs⁵), and the WB standard procurement documents⁶, the contractor shall manage all construction sites in such a way that the workers and the community are protected adequately against possible OHS risks. Key elements of OHS measures should include (a) identification of potential hazards to workers; (b) provision of preventive and protective measures; (c) training of workers and maintenance of training records; (d) documentation and reporting of occupational accidents and incidents; (e) emergency preparedness; and (f) remedies for occupational injuries and fatalities.
- **Child labour.** The minimum age of project workers eligible for any type of work under the project (including construction work) is set at 18. The engagement of project workers between the age of 15 and under 18 years may be allowed only for non-hazardous work that would not interfere with the child's education (subject to prior risk assessment and regular monitoring on health and safety conditions, hours of work and any other aspects) in accordance with ESS2. To prevent any engagement of under-aged labour, all contracts shall have contractual provisions to comply with the minimum age requirements, including penalties for non-compliance. The contractor is required to maintain labour registry of all contracted workers with age verification.
- **Labour influx.** To minimise the labour influx, the project will contractually require the contractor to preferentially recruit unskilled labour from the local communities. All contracted workers will be required to sign the code of conduct (see Annex 1 on the Guideline on Code of Conduct) before the commencement of work, which includes a provision to address the risk of Gender-Based Violence (GBV). The code of conduct governs both on-site behaviours (with colleagues) and conduct in the community. Relevant training will be provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values.
- **Labour disputes over terms and conditions of employment.** To avoid labour disputes, fair terms and conditions will be applied for project workers in the project (more details are provided in Chapter 9). The project will also have grievance mechanisms for project workers (direct workers and contracted workers) in place to promptly address their workplace grievances (more details are provided in Chapter 10). Further, the project will respect the workers' right of labour unions and freedom of association, as set out in the national Labour Code.
- **Discrimination and exclusion of vulnerable/disadvantaged groups.** The employment of project workers under the project will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination concerning any aspects of the employment relationship, such as recruitment and hiring, terms of employment (including wages and benefits), termination and access to training. To address the risk of exclusion of vulnerable groups such as women and persons with disabilities from employment opportunities, the project will require the contractor to employ such groups as part of their unskilled workforce. The contractor will also be required to comply with the national Labour Code on gender equality in the workplace, which will include the provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate from

⁵ The WBG General EHSs are technical reference documents with general statements of Good International Industry Practice, which provide guidance to users on general EHS issues. The applicability of the ESHs should be tailored to the hazards and risks established for each project.

⁶ The WB Standard Procurement Document for Work is likely to be used for the Project, which will include relevant OHS provisions, such as the appointment of ESHS officer, development of Contractor-ESMP or ESHS, compliance with OHS measures and reporting, and the use of Code of Conduct.

men and women workers where and when it is possible. The contractor will also be required to enable safety in the workplace to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported, and potential discrimination along ethnic lines under the project.

53. **Monitoring and reporting.** The contractor shall report to the MAL/PMU and the construction and supervision consultants on the status of implementation of the above policies and procedures on a monthly or quarterly basis. The MAL/PMU and the construction and supervision consultants will closely monitor the contractor/subcontractor on labour and occupational health and safety performance and report to the World Bank quarterly (see Chapter 11 for more details).
54. **Fatality and serious incidents.** In the event of an occupational fatality or severe injury, the MAL/PMU shall report to the Bank as soon as becoming aware of such incidents and inform the relevant government authorities (where available) in accordance with national reporting requirements (which *labour act or Code Chapter IX??*). Corrective actions shall be implemented in response to project-related incidents or accidents. The MAL/PMU or, where relevant the contractor, will be required to conduct a root cause analysis for designing and implementing further corrective actions.

Table 3: Overview of Project policies and indicative procedures to address key labour risks

Key labour risks	Policies to address risks	Procedures to back up the policy
1. OHS risks	<ul style="list-style-type: none"> - In conformity with OHS requirements as set out in Labour Code (Chapter IX Articles 133-152), ESS2 (including WBG EHSs), the ESMF, and WB standard procurement documents. 	<ul style="list-style-type: none"> - Select a legitimate and reliable contractor through screening OHS records. - Address OHS risks adequately with non-compliance remedies in procurement documents. - Require the contractor to engage qualified OHS staffing - Enhance workplace OHS awareness and training (for example, during COVID-19). - Provide materials for handwashing and hygiene at work sites. - Provide masks in case of infectious disease outbreaks; - Practice social distancing on the worksite, following national and international guidelines. - Conduct routine monitoring and reporting.
2. Child labour	<ul style="list-style-type: none"> - Set the minimum age of project workers eligible for any type for work (including construction work) at 18 years. - Allow the engagement of project workers between the age of 15 and under 18 years only for non-hazardous work that would not interfere with the child's 	<ul style="list-style-type: none"> - Include minimum age in procurement documents. - Raise awareness on child protection with contractors and in the communities. - Maintain labour registry of all contracted workers with age verification. - Develop remedial procedures to deal with child labour incidents.

Key labour risks	Policies to address risks	Procedures to back up the policy
	education in accordance with ESS2.	
3. Labour influx	<ul style="list-style-type: none"> - Minimise the labour influx by prioritising local workforce. - Minimise labour-related risks on the community through the code of conduct, including GBV. 	<ul style="list-style-type: none"> - Require the contractor to preferentially engage unskilled local workforce from the local communities. - Make all contracted workers sign code of conduct, including the prevention of GBV. - Make all contracted workers follow the rules for on-site behaviour (with colleagues) and conduct in the community. - Conduct induction and toolbox talks, outlining expected conduct and local community values. - Introduce disciplinary measures for violations and misbehaviours.
4. Labour disputes	<ul style="list-style-type: none"> - Respect the national Labour Code and promptly address workplace grievances to minimise the risk of labour disputes. 	<ul style="list-style-type: none"> - Provide workers with contracts with fair terms and conditions. - Have grievance mechanisms in place to promptly address workplace concerns. - Respect the national Labour Code on workers' right of labour unions and freedom of association.
5. Discrimination and exclusion of vulnerable or disadvantaged groups	<ul style="list-style-type: none"> - Promote no discrimination and equal opportunity concerning any aspects of the employment relationship. 	<ul style="list-style-type: none"> - Require the contractor to employ vulnerable groups as part of the unskilled workforce. - Provide maternity leave and nursing breaks where relevant. - Arrange sufficient and suitable toilet and washing facilities, separate for men and women workers. - Require the contractor to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers. - Require the non-discrimination and harassment and should be socialised/basis for training, and covers potential ethnic discrimination.
6. Security risks	<ul style="list-style-type: none"> - Take appropriate and proportionate security measures to minimise the potential risk to the workers. 	<ul style="list-style-type: none"> - Arrange security protection to be determined by security authorities to address external security risks (such as terrorism and armed insurgency). - Restrict work hours to minimise security threat. - Maintain a low profile of the site and workers. - Address internal security risks associated with the deployment of security personnel on

Key labour risks	Policies to address risks	Procedures to back up the policy
		the community and project workers in line with the WB Good Practice Note "Assessing and Managing the Risks and Impacts of the Use of Security Personnel" (such as the training of security officers on the principles of proportionality in the use of force.).

7 AGE OF EMPLOYMENT

55. **Age limitation for hazardous work.** As indicated above, the national Labour Code states that it is forbidden to employ children below 15 years of age, except for those professions and jobs to be defined by the Ministry of Commerce, Industry, Labour and Immigration. Similarly, ESS2 (para 19) sets out additional conditions on the minimum age, stating that a child over the minimum age and under the age of 18 will not be employed or engaged in connection with the Bank-financed Project, in a manner that is likely to hazardous⁷ or interfere with the child's education or be harmful to the child's health or physical, mental and any other relevant development. Considering these national and WB requirements, the minimum age for hazardous work under the project (including construction) is set at 18 (for example, work at quarries to obtain construction materials; work with dangerous machinery, equipment or tools; work involving handling or transport of heavy loads; or work at height).
56. **Minimum age for project workers.** The project will not employ persons under the age of 18. The national Labour Code, as well as ESS2, allow persons under 18 and over 15 to be engaged if the work is **non-hazardous** and does not interfere with the child's education and not harmful to the child's development (for example, administrative work, site cleaning or rubbish removal). The minimum age of project workers for such (non-hazardous) work under the project is set at 15, and the minimum age of project workers eligible for construction works is set at 18.
57. **The process of age verification.** To prevent engagement of under-aged labour, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor is required to maintain labour registry of all contracted workers with age information. Verification of the age shall be undertaken before the engagement of labour and be documented based on the workers' ID or any available legal documents.

8 EXAMPLE OF TERMS AND CONDITIONS

58. **Direct workers.** The terms and conditions for direct workers in MAL/PMU and Consultant service providers including the E&S consultants, Engineering Design and Supervision Consultant or construction and supervision consultants will be governed by the Standard World Bank Consultancy which set higher standards than the national Labour Code.
59. **Contracted workers.** Chapter 4xx on Overview of Labour Legislation above is the guiding legislation on employment terms and conditions for contracted workers.

⁷ Examples of hazardous work activities prohibited for persons between the minimum age and 18 under ESS2 include work: (a) with exposure to physical, psychological or sexual abuse; (b) underground, underwater, working at heights or in confined spaces; (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise or vibration damaging to health; or (e) under difficult conditions such as work for long hours, during the night or in confinement on the premises of the employer.

60. **Provision of the written individual contract of employment.** A written individual contract of employment shall be provided to workers that specify the following: (a) name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of the contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of a contract. Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in a language that is understandable to both parties. In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
61. **Notice for termination of the contract.** Either of the contracting parties may terminate a contract of employment by giving written notice as under (a) not less than ten days in the case of manual workers, or (b) not less than 30 days in the case of non-manual workers. No notice needs to be given in case the duration of the contract does not exceed one month.
62. **Minimum Wages.** While the mechanism to set the official minimum wage as prescribed by *the Labour Code (para/Article 91)* is not currently functioning, the market rate is available for each job type in a different locality. The fair market rate will be identified and applied for the Project workers.
63. **Hours of Work.** The regular hour of work of a project worker shall not exceed 8 hours a day or 48 a week (Labour Code, Article 104). Hours worked more than the regular hours of work shall not exceed 12 hours a week and shall entitle a worker to a proportionate increase in remuneration.
64. **Rest per week.** Every worker shall be entitled to one day's rest each week, which should typically fall on Sunday (Article 108). It shall consist of at least 24 consecutive hours each week. Workers shall also be entitled to a rest day on public holidays recognised as such by the State.
65. **Annual leave.** Workers shall be entitled to 12 to 16 days' leave with pay for every year of continuous service (Art. 111). An entitlement to leave with pay shall usually be acquired after a full year of continuous service.
66. **Maternity leave.** A female worker shall be entitled, on presentation of a medical certificate indicating the expected date of her confinement, to 6 months of maternity leave (Art 157). During maternity leave, the female employee is entitled to maternity benefits as regulated in the Law on Social Insurance.
67. **Deductions from remuneration.** No deductions other than those prescribed by the Code (Article 101) or regulations made thereunder, or any other law or collective Labour agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. The contractor shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.
68. **Death benefit.** In case of death of a worker during his contract of employment, the employer shall pay to his heirs an amount equivalent to 30 months' wages (Art. 145).
69. **Medical treatment of injured and sick workers.** It shall be the duty of the employer to arrange at his own expense for the conveyance to the nearest hospital of any injured or sick worker who can be so conveyed and who cannot be treated on the spot with the means available (article 144).
70. **Collective Agreements.** A collective agreement is an agreement relating to terms and conditions of work concluded between the representatives of one or more trade unions, on the one hand, and the representatives of one or more employers, on the other hand. Where collective agreements exist between the employer and project workers, such agreements will be applied, where relevant.

9 GRIEVANCE MECHANISM

71. **General principles.** While the project will have in place a grievance mechanism to address concerns of project-affected parties, the nature of workplace concerns of workers is usually different. For example, typical workplace grievances include demand for employment opportunities; labour wages rates and delays of payment; disagreement over working conditions; and health and safety concerns in the work environment. Therefore, a separate grievance mechanism will be established for project workers (direct workers and contracted workers) as required in the World Bank ESS2 and ILO's employers' guide on managing your workplace during COVID-19 (2020)
72. . The general principles of the grievance mechanism are to:
- Covers all direct and contracted workers
 - facilitate easy access and resolution of workplace grievances
 - have a procedure in place so that workers know GM exists and how to access it
 - have measures in place to protect workers against reprisal for the use of GM
 - have GM required for community worker, adapted to reflect needs
 - Labour GM separate from general Project GM
 - utilise existing GMs, providing these are accessible and effective
73. Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. Different ways in which workers can submit their grievances should be allowed, such as submissions in person, by phone, text message, mail and email. The grievance raised should be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of the grievance, health and safety concerns in the work environment or any other urgent issues should be addressed immediately. Where the grievance cannot be addressed within a reasonable timeframe, the aggrieved worker should be informed in writing, so that the worker can consider proceeding to the State inspection on labour (see below for more details). The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential.
74. **Direct workers.** MAL/PMU, currently, does not have a grievance mechanism in place which allows all of its employees to raise workplace concerns. MAL/PMU will hold periodic team meetings to discuss any workplace concerns. The grievance raised by workers will be recorded with the actions taken by each unit. The summary of grievance cases will be reported to the World Bank as part of the regular report. Where the aggrieved direct worker wishes to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the worker may raise the issue with responsible authorities, where relevant. Where the construction and supervision consultants have an existing grievance system, their direct workers should use such a mechanism.
75. **Contracted workers.** The construction contractors will prepare their labour management procedure before the start of civil works, which will also include a detailed description of the workers' grievance mechanism.
76. The workers' grievance mechanism will include:
- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
 - stipulated timeframes to respond to grievances;
 - a register to record and track the timely resolution of grievances;

- a responsible department to receive, record and track resolution of grievances.
77. The assigned site manager and OHS officer or any other appropriate officer of the contractor will hold a daily team meeting with all present contracted workers at the site at the end of the daily work to discuss any workplace grievances. The grievance raised will be recorded with the actions taken by the contractor. The summary of grievance cases will be reported to the MAL/PMU and the construction and supervision consultant as part of the contractor's periodic report. Where appropriate and available, the contracted workers should be allowed to utilise an existing grievance mechanism within the contractor. Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the MAL/PMU and/or the construction supervision consultant. The contracted workers will be informed of the grievance mechanism before the commencement of work. The contact information of the MAL/PMU and/or the construction supervision consultants will be shared with contracted workers.
78. **State Inspection on Labour, Sanctions Against Violations of Labour Legislation.** As per the Labour Code (Articles 237-239), the labour inspector is mandated to settle complaints and denunciations of employees of violations of the labour legislation and to receive and settle complaints and denunciations about violations of the labour legislation, as prescribed by law.
79. **Grievance Handling Procedure.** The table provides steps with responsibilities of grievances relating to the complaint handling linked to labour issue. The fundamental purpose of this exercise is to present a grievance redress mechanism (GRM) process in an effective and user-friendly manner.

Table 4: GRM procedures for complaint handling process

Steps	Complainants	GRM Functions	Timeframe
Community-level GRM/mediation: The Affected Person (AP)/workers/complainant (or his/her representative) may submit his/her complaint in several ways, e.g. by written letter, phone, SMS messages and email to the GRM or raise his/her voice in a public or individual meeting with project staff.			
1	Submission of complaint to the local or community level GRM/mediation	<ul style="list-style-type: none"> • Conduct public consultations among the affected communities to use grievance service. • Register a grievance in the project logbook and grievance database. • Segregate/sort and process. • Acknowledge and follow up of grievance. • Verify investigate, and act • Provide written response to the complainants. 	7- 14 days
Project or Site level GRM:			
(a) Project Level GRM: If resolution at the local/community level is unsuccessful, or the Affected Person (AP) can take his or her complaint to project level GRM.			
2	Submission of grievance to the project level GRM through one of the channels	<ul style="list-style-type: none"> • Conduct coordinating meetings among complainants/public and appropriate administration levels. • Provide written response to the complainant. • Provide written response to the complainant 	15 days
(b) GRM for Workers: The project workers (all three categories, direct workers, contracted workers and primary supply workers) can directly register their complaints with the GRM for workers. The members of this GRM will be trained to be capable to address grievances by workers, including workplace complaints efficiently and effectively to meet national regulations on labours and World Bank ESS2.			
3	Workers or labour association will submit their grievance to the GRM for	<ul style="list-style-type: none"> • Refer workers related complaints to the Workers GRM. 	10 days

Steps	Complainants	GRM Functions	Timeframe
	Workers through one of the channels	<ul style="list-style-type: none"> Registration, classification and analysis of grievances. Convene the GRM for workers meeting to analyse and resolve the complaint. Provide a written response to the complainant/contractor. Guide with recommendations to the contractor to improve working condition/labour-management issues. 	
Provincial Level GRM: In case the grievance is not resolved within 10 days of its receipt, or it is unattended, the complainant can approach the provincial level GRM or to the court. The grievance will be examined and addressed within 30 days.			
4	Workers, labour associations or the AP can refer the complaint to the provincial GRM	<ul style="list-style-type: none"> Conduct coordinating meetings/ resolution sessions with complainants. Investigate the complaints. Provide written response to the complainants. 	30 days
Referee Level: If all above fails, the last recourse is the stipulations in the Labour Code.			

80. **Grievances related to Gender-Based Violence (GBV).** To avoid the risk of stigmatisation, exacerbation of the mental or psychological harm and potential reprisal, the GRM shall have a different and sensitive approach to GBV related cases. The GRM equally applies to workers who experience GBV. Where such a case is reported to the GRM, it should immediately be referred to the appropriate service providers, such as medical and psychological support, emergency accommodation, and any other necessary services. It should also be reported to the safeguards staff of the MAL/PMU who can advise on relevant service providers. Data on GBV cases should not be collected through the GRM unless operators have been trained on the empathetic, non-judgmental and confidential collection of these complaints. Only the nature of the complaint (what the complainant says in her/his own words) and additional demographic data, such as age and gender, can be collected as usual.

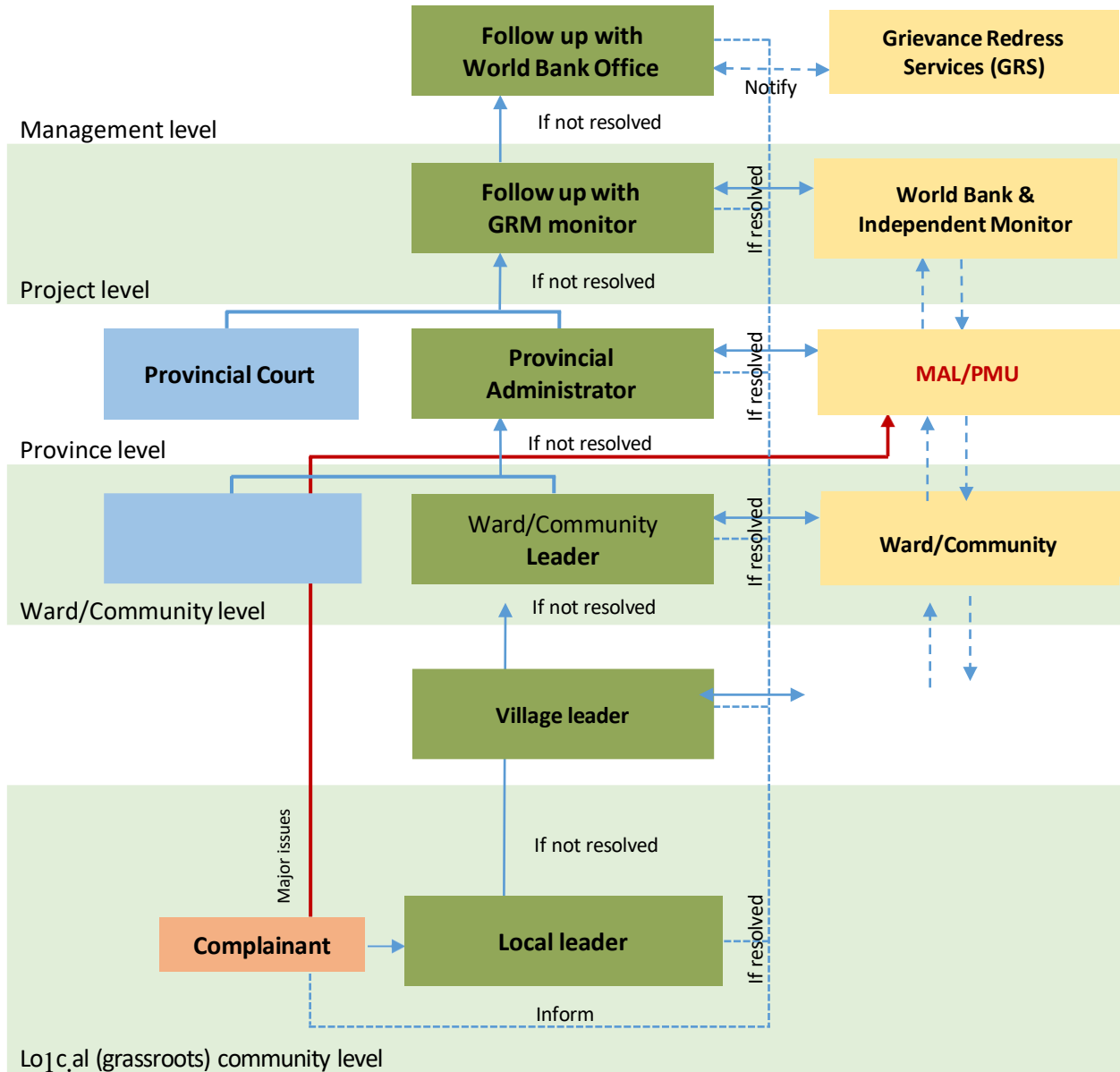
81. **Publicising the GRM.** The MAL/PMU will be in charge of publicising the GRM. MAL/PMU should ensure that GRM is explained during public meetings. MAL/PMU should also ensure that leaflets on GRM are distributed during public meetings and made available at ward/commune levels with contact numbers of the focal person for the GRM. Posters will be also be posted at ward/commune levels.

82. The following procedures shall be followed while filing and processing complaints through the above described GRM structures:

- **Grievance Register Book:** A grievance register book shall be opened and kept in the MAL office probably the UST in HQ and the Chief field officer in the Provinces. All grievances shall be registered when and upon the receipt of complaints from the aggrieved. The book shall have: i) case reference number, ii) the aggrieved name, iii) the date the case is received, iv) the date the case is resolved and, v) a remarks column;
- **Responsibility for Registering Complainants:** the community resource persons (CRPs) or resident focal point in the project area shall register in the Grievance Register Book all written complaints received;
- **Case Receipt:** Within 24 hours of receiving complaints, the monitoring consultant shall issue a letter to the aggrieved acknowledging receipt of the case and providing a date when the case will be reviewed as well as the venue;
- **Public access to the book:** The book shall be accessible to the public;

- GBV grievances will not be documented in the publicly accessible book. However, a GBV action plan will be prepared to manage related risks. The all-level women's unions will be engaged for awareness-raising and ensure a system that captures GBV/SEA and HIV/AIDS-related issues will be developed;
- PAPs: All PAPs who have issues with their compensation and assistance are required to submit written complaints to the appropriate level of GRMs;
- Mediation meetings and outcomes will be recorded and kept by the GRM person-in-charge.

THE GRIEVANCE PROCESS CHART



10 CONTRACTOR MANAGEMENT

83. **Selection of Contractors.** MAL will use the Bank's 2017 Standard Procurement Documents ⁸ for solicitations and contracts, and these include labour and occupational, health and safety requirements.

84. These include labour and occupational, health and safety requirements. The MAL/PMU shall make reasonable efforts to ascertain that the contractor who will engage contracted workers is legitimate and reliable entities and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the bidding documents. As part of the process to select the contractors who will engage contracted workers, the MAL/PMU may review the following information:

- Business licenses, registrations, permits, and approvals

⁸

- Public records, for example, corporate registers and public documents relating to violations of applicable labour law; accident and fatality records and notifications to authorities; labour-related litigations,
 - Documents relating to the contractor's labour management system and OHS system (e.g., HR manuals, safety program); ESHS personnel and their qualification,
 - Previous contracts with contractors and suppliers (showing the inclusion of provisions and terms reflecting requirements on labour and working conditions).
85. **Contractual Provisions and Non-Compliance Remedies.** The MAL/PMU shall incorporate the agreed labour management requirements as specified in the bidding documents into contractual agreements with the contractor, together with appropriate non-compliance remedies (such as the provision on withholding 10 % of the payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works; or lack in the OHS performance security). In the case of subcontracting, the MAL/PMU will require the contractor to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.
86. **Performance Monitoring.** The MAL/PMU shall establish resources and procedures for managing and monitoring the performance of the contractor in relation to the LMP. The MAL/PMU will ensure that the contract with the construction and supervision consultants explicitly set out their monitoring responsibility for the contractor's performance on labour and working conditions daily. The monitoring may include, inspections, and/or spot checks of project locations or worksites and/or of labour management records and reports compiled by the contractor. Contractors' labour management records and reports that should be reviewed would typically include the following:
- Representative samples of employment contracts and signed code of conduct;
 - Grievances received from the community and workers and their resolution;
 - Reports relating to fatalities and incidents and implementation of corrective actions;
 - Records relating to incidents of non-compliance with national Labour Code and the provisions of the LMP; and
 - Records of the training provided for contracted workers to explain occupational health and safety risks and preventive measures.
87. The project requires that contractors monitor, keep records and report on terms and conditions related to Labour management. The contractor must provide workers with evidence of all payments made, including social security benefits, pension contributions or other entitlements regardless of the worker being engaged on a fixed-term contract, full-time, part-time or temporarily. The application of this requirement will be proportionate to the activities and the size of the contract, in a manner acceptable to the MAL/PMU and the World Bank:
- **Labour conditions:** records of workers engaged under the project, including contracts registry of induction/training of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime), collective bargaining agreements.
 - **Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
 - **Workers:** number of workers, an indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).

- **Training/induction:** dates, number of trainees, and topics.
- **Details of any security risks:** details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project.
- **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

11 PRIMARY SUPPLY WORKERS

88. **Potential risks in primary supply workers for agriculture and livestock.** The project will require primary supplies, including agriculture materials and livestock inputs to be used in demonstrations on an ongoing basis. MAL will ensure the **primary suppliers for agriculture and livestock** comply with the standards set by ESS2. These include the compliance with Child Labour and Forced Labour, Terms and Conditions of Employment; Environmental, Social, Health and Safety as outlined in the LMP.
89. **Potential risks in primary supply workers for small Infrastructure.** The construction work under the project will require primary supplies, including construction materials essential for the functions of the proposed Infrastructure, such as timber aggregates, hardware materials. Some contractors may be able to produce such construction materials by their workforce. However, where the contractor will source (a) essential materials (b) directly from primary suppliers (c) on an ongoing basis, the workers engaged by such primary suppliers (that meet all three criteria (a) to (c)) are deemed "primary supply workers", as defined in ESS2.
90. As discussed in Chapter 4 (Key Labour Risks), the OHS risks are also deemed to be generally significant in the construction sector, including quarry sites where there is no functioning Labour inspection mechanism. To address these potential risks, the following measures will be taken:
- **Selection of primary suppliers.** When sourcing construction materials from primary suppliers, the contractor will require such suppliers to identify the risk of child labour/force labour and severe safety risks in producing construction materials. The MAL/PMU and the construction and supervision consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labour/forced labour and work safety issues in all purchase orders and contracts with primary suppliers.
 - **Remedial process.** Suppose child labour/forced labour and/or serious safety incidents are identified concerning primary supply workers under the project. In that case, the MAL/PMU and the construction and supervision consultants will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, the MAL/PMU and the construction and supervision consultants will, within a reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

ANNEXES

Annex 1: Guidelines on Code of Conduct for Contractor's Workers and Community Workers

1.1. Guidelines on Code of Conduct

2. A satisfactory code of conduct will contain obligations on all project workers (including sub-contractors' workers and community workers) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the municipality, the location and the project sector or specific project requirements.
3. The Code of Conduct should be written in a local language and signed by each worker to indicate that they have:
 - received a copy of the code;
 - had the code explained to them;
 - acknowledged that adherence to this Code of Conduct is a condition of employment; and
 - understood that violations of the code could result in severe consequences, up to and including dismissal, or referral to legal authorities.
4. The contractor should conduct continuous awareness-raising and training activities to ensure that workers abide by the Code of Conduct (such as through toolbox talks). The contractor should also ensure that local communities are aware of the Code of Conduct and enable them to report any concerns.
5. The issues to be addressed include:
 - 1) Compliance with applicable **laws, rules, and regulations** of the jurisdiction
 - 2) Compliance with applicable **health and safety requirements** (including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)
 - 3) The use of **illegal substances**
 - 4) **Non-Discrimination** (for example based on family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction)
 - 5) **Interactions with community members** (for example to convey an attitude of respect and non-discrimination)
 - 6) **Sexual harassment** (for example to prohibit the use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
 - 7) **Violence or exploitation** (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour)
 - 8) **Protection of children** (including prohibitions against abuse, defilement, or otherwise unacceptable behaviour with children, limiting interactions with children, and ensuring their safety in project areas)
 - 9) **Sanitation** requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
 - 10) Avoidance of **conflicts of interest** (such that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection)

- 11) **Respecting reasonable work instructions** (including regarding environmental and social norms)
- 12) **Protection and proper use of a property** (for example, to prohibit theft, carelessness or waste)
- 13) Duty to **report violations of this code**
- 14) **No retaliation against workers** who report violations of the code, if that report is made in good faith.

1.2. Template on Code of Conducts

Note: The template on Workers Code of Conducts will also be integrated into the bidding/contractual document.

DO:	DO NOT:
<ul style="list-style-type: none"> ◆ USE THE TOILET FACILITIES PROVIDED – REPORT DIRTY OR FULL FACILITIES ◆ CLEAR YOUR WORK AREAS OF LITTER AND BUILDING RUBBISH AT THE END OF EACH DAY – use the waste bins provided and ensure that litter will not blow away. ◆ REPORT ALL FUEL OR OIL SPILLS IMMEDIATELY & STOP THE SPILL FROM CONTINUING. ◆ SMOKE IN DESIGNATED AREAS ONLY AND DISPOSE OF CIGARETTES AND MATCHES CAREFULLY. (Littering is an offence.) ◆ CONFINE WORK AND STORAGE OF EQUIPMENT TO WITHIN THE IMMEDIATE WORK AREA. ◆ USE ALL SAFETY EQUIPMENT AND COMPLY WITH ALL SAFETY PROCEDURES. ◆ PREVENT CONTAMINATION OR POLLUTION OF STREAMS AND WATER CHANNELS. ◆ ENSURE A WORKING FIRE EXTINGUISHER IS IMMEDIATELY AT HAND IF ANY “HOT WORK” IS UNDERTAKEN e.g. welding, grinding, gas cutting etc. ◆ REPORT ANY INJURY OF WORKERS OR ANIMALS. 	<ul style="list-style-type: none"> ◆ REMOVE OR DAMAGE VEGETATION WITHOUT DIRECT INSTRUCTION. ◆ MAKE ANY FIRES. ◆ POACH, INJURE, TRAP, FEED OR HARM ANY ANIMALS – this includes birds, frogs, snakes, etc. ◆ ENTER ANY FENCED OFF OR MARKED AREA. ◆ DRIVE RECKLESSLY OR ABOVE SPEED LIMIT ◆ ALLOW WASTE, LITTER, OILS OR FOREIGN MATERIALS INTO THE STREAM ◆ LITTER OR LEAVE FOOD LYING AROUND. ◆ CUT TREES FOR ANY REASON OUTSIDE THE APPROVED CONSTRUCTION AREA ◆ BUY ANY WILD ANIMALS FOR FOOD; ◆ USE UNAPPROVED TOXIC MATERIALS, INCLUDING LEAD-BASED PAINTS, ASBESTOS, ETC.; ◆ DISTURB ANYTHING WITH ARCHITECTURAL OR HISTORICAL VALUE ◆ USE OF FIREARMS (EXCEPT AUTHORIZED SECURITY GUARDS) ◆ USE OF ALCOHOL BY WORKERS DURING WORK HOURS ◆ WASH CARS OR MACHINERY IN STREAMS OR CREEK ◆ DO ANY MAINTENANCE (CHANGE OF OILS AND FILTERS) OF CARS AND EQUIPMENT OUTSIDE AUTHORIZED AREAS

<ul style="list-style-type: none"> ◆ DRIVE ON DESIGNATED ROUTES ONLY. ◆ PREVENT EXCESSIVE DUST AND NOISE 	<ul style="list-style-type: none"> ◆ DISPOSE TRASH IN UNAUTHORIZED PLACES ◆ HAVE CAGED WILD ANIMALS (ESPECIALLY BIRDS) IN CAMPS ◆ WORK WITHOUT SAFETY EQUIPMENT (INCLUDING BOOTS AND HELMETS) ◆ CREATE NUISANCES AND DISTURBANCES IN OR NEAR COMMUNITIES ◆ USE RIVERS AND STREAMS FOR WASHING CLOTHES ◆ DISPOSE INDISCRIMINATELY RUBBISH OR CONSTRUCTION WASTES OR RUBBLE ◆ SPILL POTENTIAL POLLUTANTS, SUCH AS PETROLEUM PRODUCTS ◆ COLLECT FIREWOOD ◆ DO EXPLOSIVE AND CHEMICAL FISHING ◆ USE LATRINES OUTSIDE THE DESIGNATED FACILITIES; AND ◆ BURN WASTES AND/OR CLEARED VEGETATION.
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Annex 2: Workers and Workforce Management

A concern during the construction phase of the project is the potentially negative impacts of the workforce interactions with the local communities. For that reason, a Code of Conduct shall be established to outline the importance of appropriate behaviour, alcohol abuse, and compliance with relevant laws and regulations. Each employee shall be informed of the Code of Conduct and bound by it while in the employment of the Client or its Contractors. The Code of Conduct shall be available to local communities at the project information centres or other places easily accessible to the communities.

The contractor is responsible for providing appropriate training to all staff according to their level of responsibility for environmental, health and safety matters.

The Code of Conduct shall address the following measures (but not limited to them):

- All of the workforces shall sign in the CoCs and abide the laws and regulations
- Illegal substances, weapons and firearms shall be prohibited;
- Pornographic material and gambling shall be prohibited;
- Fighting (physical or verbal) shall be prohibited;
- Creating nuisances and disturbances in or near communities shall be prohibited;
- Disrespecting local customs and traditions shall be prohibited;
- Smoking shall only be allowed in designated areas;
- Maintenance of appropriate standards of dress and personal hygiene;
- Maintenance of appropriate standards hygiene in their accommodation quarters;
- Residing camp workforce visiting the local communities shall behave in a manner consistent with the Code of Conduct; and
- Failure to comply with the Code of Conduct, or the rules, regulations, and procedures implemented at the construction camp will result in disciplinary actions.
- Develop a Code of Conduct for sexual harassment in the workplace and check their compliance. The MAL/PMU should supervise the implementation of this code strictly; regularly organise activities for raising legal awareness for male and female workers such as the provision of leaflets, regular activities.

Prohibitions. The following activities are prohibited on or near the project site:

- Cutting of trees for any reason outside the approved construction area;
- Hunting, fishing, wildlife capture, or plant collection;
- Buying of wild animals for food;
- Use of unapproved toxic materials, including lead-based paints, asbestos, etc.;
- Disturbance to anything with architectural or historical value;
- Building of fires;
- Use of firearms (except authorised security guards);
- Use of alcohol by workers during working hours;
- Gambling should be strictly forbidden.
- Washing cars or machinery in streams or creeks;
- Doing maintenance (change of oils and filters) of cars and equipment outside authorised areas;
- Disposing of trash in unauthorised places;
- Driving in an unsafe manner in local roads;
- Having caged wild animals (especially birds) in camps;
- Working without safety equipment (including boots and helmets);
- Creating nuisances and disturbances in or near communities;
- The use of rivers and streams for washing clothes;
- Indiscriminate disposal of rubbish or construction wastes or rubble;
- Littering the site;
- Spillage of potential pollutants, such as petroleum products;
- Collection of firewood;
- Poaching of any description;
- Explosive and chemical fishing;

- Latrine outside the designated facilities; and
- Burning of wastes and/or cleared vegetation.

Security. Some security measures shall be put into place to ensure the safe and secure running of the camp and its residents. Some of these security measures include:

- The list of workers must be registered to local authorities following existing national regulations
- Children under 15 years of age will not be hired under the project
- Adequate, day-time night-time lighting shall be provided;
- Control of camp access. Access to the camp shall be limited to the residing workforce, construction camp employees, and those visiting personnel on business purposes;
- Prior approval from the construction camp manager for visitor's access to the construction camp;
- A perimeter security fence at least 2m in height constructed from appropriate materials;
- Provision and installation in all buildings of firefighting equipment and portable fire extinguishers.

Any construction worker, office staff, contractor's employees or any other person related to the project found violating these prohibitions will be subject to disciplinary actions that can range from a simple reprimand to termination of his/her employment depending on the seriousness of the violation.

Annex 3: Gap Analysis of the National Labour Legislation VS. ESS2

ESS2 REQUIREMENT	NATIONAL REQUIREMENTS	LABOUR	COMMENT ON GAP and PRACTICE	PROJECT MEASURES
Terms and Conditions of Employment			<p>Less formal enterprises may not be aware of these rules.</p> <p>Unlikely that employment cards could be obtained for any type of temporary worker</p>	<p>Project direct workers will have clear terms and conditions of employment.</p> <p>Contractors to be required to comply with Labour Law provisions.</p>
Non-Discrimination and Equal Opportunity			<p>No clear enforcement mechanism</p> <p>Not clear that quotas for employment of people with disabilities are set by Sub-Decree (as required by the law) and / or enforced in practice.</p>	<p>Non-discrimination and equal opportunity to be applied to the employment of direct project workers.</p> <p>Fair and non-discriminatory employment practices to be required for contracted workers. Where contractors hire workers from the beneficiary community, disadvantaged and vulnerable community members are to have equal access to opportunities. Where large numbers of community members are employed, childcare facilities to be provided.</p>
Rights to Organise			Labour unions are prominent in not common	GRM will be available to workers who are denied their right to organise
Prevention/restriction of child labour			Employment of children working alongside parents in agricultural labour is known to occur.	<p>No children aged under 15 to be employed under any circumstances (including community work). Children aged 15-17 will not be employed as direct project workers under any circumstances.</p> <p>Children aged 15-17 will not be employed as contracted workers in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.</p> <p>Children aged 15-17 will only be employed as contracted workers with advance notification and under restricted conditions (<i>see Child Labour and Forced Labour Procedure (CLFLP)</i>).</p> <p><i>Age of employees to be verified and monitored as part of contract supervision.</i></p> <p><i>Suppliers to certify non-use of child labour, with verification measures in high-risk sectors (CLFLP)</i></p>
Prevention of forced labour			Debt bondage is known to occur	<p>Any kind of forced labour, including debt bondage, prohibited.</p> <p>Suppliers to certify non-use of forced labour, with verification measures in high-risk sectors (CLFLP)</p>

			Project to monitor and report including notification on any incident within 48 hours.
Grievance Mechanism		The legislation does not guarantee workers' access to a grievance mechanism	Project to establish and operationalise a project worker grievance mechanism. The project will monitor and report on the implementation of the mechanism,
Identification of potential hazards		Enforcement of safety standards is weak, especially in informal sectors and in the construction industry	Health and safety risk assessment procedure to be established
Provision of preventive and protective measures			Occupational Health and Safety (OHS) strategy established for direct project workers Workplace safety measures for contracted workers under Environment, Social, Health and Safety Specification (ESHS)
Training of workers and maintenance of training records	Safety training not specifically mentioned		ESHS to require appropriate safety training for workers
Documentation and reporting of occupational accidents, disease and incidents	Not clear	ESS2 requires reporting procedures	All workplace health and safety incidents to be recorded in a register, required by ESHS
Emergency Preparedness	Not specifically mentioned		All worksites to have health and safety plan including emergency plans (ESHS)
Remedies for adverse impacts		No or minimal number of construction workers insured	All workers to be insured for occupational hazards (ESHS)