



**GOVERNMENT OF THE REPUBLIC OF SOUTH SUDAN
MINISTRY OF AGRICULTURE AND FOOD SECURITY**

**PRODUCTIVE SAFETY NET FOR SOCIOECONOMIC
OPPORTUNITIES PROJECT (SNSOP)**

LABOUR MANAGEMENT PROCEDURES (LMP)

MARCH 2023

JUBA, SOUTH SUDAN

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ABBREVIATIONS AND ACRONYMS

CBCM	Community Based Complaints Mechanism
C-ESMP	Construction Environmental and Social Management Plan
CoC	Code of Conduct
ECD	Early Childhood Development
EHSG	Environmental Health and Safety Guidelines
EHS	Environmental Health and Safety
ESMP	Environmental and Social Management Plan
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
GBV	Gender Based Violence
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
GRSS	Government of the Republic of South Sudan
HIV	Human Immuno-deficiency Virus
IAIG	Internal Audit and Investigation Group
IGAD	Intergovernmental Authority on Development
ILOAT	International Labour Office Administrative Tribunal (ILOAT)
ILO	International Labour Organisation
IP	Implementing Partner
LMP	Labour Management Procedures
MAFS	Ministry of Agriculture and Food Security
M & E	Monitoring and Evaluation
NGOs	Non-Governmental Organisations
OCD	Office for Coordination and Decentralisation
OHS	Occupational Health and Safety

PCG	People and Change Group
PCU	Project Coordination Unit
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PSA	Personal Services Agreement
PSEA	Protection against Sexual Exploitation and Abuse
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SNSDP	Safety Net and Skills Development Project
SSSNP	South Sudan Safety Net Project
SOP	Standard Operating Procedure
SSLs	South Sudan Law Society
SP	Social Protection
SWP	Safe Working Procedures
TOR	Terms of Reference
TRA	Task-specific Risk Assessment
UNOPS	The United Nations Office for Project Services
VSC	Vendor Sanctions Committee

1. INTRODUCTION

1.1 Labour Management Procedures

Under the World Bank Environmental and Social Standard 2 (ESS2: Labour and Working Conditions), the Borrower (the Government of the Republic of South Sudan as the grant receiver, and Ministry of Agriculture and Food Security – MAFS as the implementing agency) is required to develop labour management procedures (LMP). The purpose of the LMP is to identify the main labour requirements and risks associated with the Productive Safety Nets for Socio-Economic Opportunities Project (SNSOP), and help the Borrower to determine the resources necessary to address project labour issues. The LMP will enable different project-related parties such as staff of the project implementing unit, consultants and project workers, and primary suppliers, to have a clear understanding of what is required on a specific labour issue. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

1.2 Project Description

The proposed project is a US\$129 million grant from the International Development Association (IDA) and will support four components, to be implemented over a 4-year period. The components are: (i) Cash Transfers and Complementary Social Measures; (ii) Provision of Economic Opportunities; (iii) Strengthened Institutional Capacity and Social Protection System; (iv) Project Management, Monitoring and Evaluation, and Knowledge Generation.

The project will be guided by principles of government ownership, capacity strengthening and close collaboration with partners for strengthened humanitarian-development-peace nexus. While it is envisioned that an initial on-the-ground implementation will need to be undertaken by United Nations Office for Project Service (UNOPS) and other third-party agencies, the Government of the Republic of South Sudan will be the direct recipient of the IDA grant and be responsible for all aspects of project design, management, and implementation. As such, the focus from the onset will be to strengthen government capacities in terms of systems, procedures, and institutional development in a phased manner for an eventual government-led National Safety Net system. Efforts will be made to build on the experiences and lessons of previous relevant interventions in South Sudan to scale up what works and pilot new initiatives, starting small and expanding gradually, taking into account capacity and operational constraints. Design of project activities will be informed by analytical work done by the World Bank and partners in the Social Protection (SP) sector in South Sudan and other Fragility, Conflict and Violence (FCV) contexts, providing opportunities for testing innovations and advancing on policy dialogue around increased coherence in safety net approaches guided by evidence of success. Further, the project design will actively aim to strengthen the humanitarian-development-peace nexus for longer-term stability and development in support of on-going recovery efforts. Lastly, considerations on gender, Gender Based Violence (GBV), and climate change adaptation will be mainstreamed across all project components.

1.3 Project Development Objective and Components

The Project Development Objective (PDO) is to provide cash transfers and access to income generating opportunities and strengthen the National Safety Net Delivery System

Component 1: Cash Transfers and Complementary Social Measures

This component will provide cash assistance to poor and vulnerable households to meet immediate consumption gaps, while also supporting accompanying social measures to promote improved household

awareness and investment in children’s human capital growth. Specifically, cash assistance will be provided through two modalities, namely Labour-Intensive Public Works (LIPW, sub-component 1.1) and Direct Income Support (DIS, sub-component 1.2) as appropriate and feasible. Accompanying social measures will be mainstreamed across LIPW and DIS for delivering in-depth Cash “Plus” trainings and other measures targeted to eligible female beneficiaries to deepen their understanding and investments in relevant social areas for strengthened human capital development. More detailed information on the activities proposed under this component is provided below.

Subcomponent 1.1: Labour Intensive Public Works

This sub-component will continue the LIPW component under the SSSNP to provide poor and vulnerable households with cash assistance to meet urgent consumption gaps, with refined design to promote social opportunities. The objective will be to increase and sustain household assets and smooth consumption during economic hardships through reliable and predictable cash assistance for enhanced household resilience to shocks and stresses. Public works activities will continue to be labour intensive and will focus on activities that will benefit the community at large, with the aim that improved community assets lead to better natural resource management, thereby contributing to climate adaptation. Innovations learned under the Safety Net and Skills Development Project (SNSDP) and South Sudan Safety Net Project (SSSNP) aimed at promoting food security and livelihoods opportunities (i.e., group-based small scale agricultural LIPW activities) will be given priority, as will be sub-projects that are focused on supporting flood control and integrated watershed management and promoting “climate smart” public works. Recognizing the highly crisis-prone context of South Sudan, with sporadic localised violence and recurring weather shocks, implementation of the LIPW will embed an adaptive approach to waive labour requirements and continue providing cash assistance to existing beneficiary households, thereby flexibly switching from LIPW to DIS, as necessary.

Implementation of the LIPW will continue to prioritise in-depth stakeholder engagement and will be linked to measures focused on enhancing social opportunities for improved human capital development. In-depth stakeholder mobilisation and awareness building with target communities and local governments will be undertaken through intensive beneficiary outreach and communication campaigns to enhance understanding and capacity for project implementation. Broad-based community engagement in terms of beneficiary household targeting, selection of priority works, and supervision and oversight will continue to be prioritised, using the existing delivery tools established under the SNSDP and strengthened under the SSSNP. In a new effort, focus will also be given to utilising the LIPW platform to promote enhanced access to social opportunities for investments in children’s human capital. For example, increased attention will be given to the gender and child sensitivity in the LIPW design and implementation by: (i) strengthening measures to incorporate women’s priorities during the selection of sub-projects; and ii) including sub-projects that contribute towards nutrition and Early Childhood Development (ECD), such as kitchen gardens and community based ECD sites. Amount and duration of transfers, as well as the target number of beneficiary households, will be determined during preparation.

Sub-component 1.2: Direct Income Support

This sub-component will continue the DIS component under the SSSNP to provide unconditional cash transfers to the poorest and most vulnerable households that either are labour constrained to engage in

LIPW or are identified as extremely vulnerable within targeted refugee and host communities. Both the experience of the SNSDP and SSSNP demonstrate that relatively large segments of vulnerable populations (i.e. the elderly, people living with severe disabilities, and child- and female-headed households) are often excluded from LIPW activities because they cannot provide labour, and therefore are most impacted by climate and other shocks in the absence of safety net assistance. Moreover, a diagnostic of the South Sudan SP sector undertaken by the World Bank demonstrates that a majority of the safety net interventions in the country tend to include work requirements (i.e., public works, cash for work), limiting the extent to which different instruments can be targeted to relevant groups for human capital accumulation.

In response, the DIS sub-component will continue to fill this gap, and will provide unconditional cash transfers to most vulnerable households that are either labour constrained or are identified to be extremely vulnerable in target refugee and host communities, as identified by the eligibility note for the Window for Host Communities and Refugees (WHR) financing. The cash assistance will also be linked to measures aimed at promoting enhanced social opportunities for improved human capital development. It will be delivered using the same operational tools as the LIPW, as beneficiary households of both sub-components will be from the same counties and communities, and transfer amounts and duration will also be aligned. Standardising the delivery across the two sub-components will promote greater cost efficiency and minimise potential grievances and tensions between the different beneficiary households. Eligibility criteria for the categorical targeting based on specific vulnerabilities and the number of beneficiary households to be targeted under this sub-component will be confirmed during project preparation.

Component 2: Provision of Economic Opportunities

This component will pilot measures aimed at enhancing economic opportunities of poor and vulnerable youth in selected project locations in an effort to support the “Idle Youth” to become productive citizens of South Sudan. This component will target a subset of eligible cash transfer beneficiaries, with priority given to male youth, and support them to strengthen their livelihoods and income generating opportunities for enhanced economic welfare. Pairing cash transfers with economic opportunities will support households to focus their investments on livelihoods, with the cash transfer used to smooth consumption in times of need. Targeting a subset of Component 1 beneficiaries will also enable the proposed project to use a single mobilisation, targeting, payment, grievance, and monitoring system for both components, thereby ensuring cost-efficiency and harmonisation and synergies of efforts. To that end, in addition to the cash assistance, these beneficiaries will be provided with a series of interventions tailored to the local context, recognizing the impact of limited formal economic opportunities and youth capacity on design choice and the need to ensure differentiated approaches across rural and urban areas. Possible activities to be further explored during preparation are:

Business and soft skills training: In-depth training on relevant business and soft skills, particularly on financial literacy, can help provide the foundation for improved livelihood outcomes and better resource management at the household level. This activity will build on the experiences and lessons learned from the financial literacy Cash ‘Plus’ training delivered through the SSSNP and SNSDP to expand and refine the training content and strengthen delivery modalities targeted at youth.

Livelihood grant: Following a set of training, a cash grant may be provided to beneficiaries to facilitate the start of livelihoods and income generating activities (IGA) for the household, based on a viable livelihoods plan.

Coaching and mentorship: The regular and accessible presence of community-based coaches and mentors can be instrumental in the success of economic inclusion interventions, albeit also expensive and time and effort intensive. As such, cost-effective options for identifying and training community-based coaches and mentors with a strong understanding of local contexts will be discussed.

IGA groups or cooperatives: Forming IGA groups and/or cooperatives can help build resilience and ensure sustainability, as group members can support each other during times of need or shock. Groups may also have more access to additional resources or services and can provide peer guidance and lessons learning.

Formation of Savings/Lending Groups or Rotating Funds: The practice of informal savings groups is already strong in South Sudan, particularly around markets. Experience has however found that male youths find it difficult to operate and sustain within these groups. As such, options for forming and sustaining these groups for youth, leveraging existing practices, will be explored as possible sources of capital funding and cushions during a shock.

Linkages to financial services like Microfinance Institutions (MFIs): Linkages with existing financial services, such as MFIs, can be highly valuable in promoting financial inclusion and access to resources. However, the MFI ecosystem in South Sudan is highly underdeveloped and largely concentrated in urban areas. Therefore, possibilities for facilitating linkages to existing MFIs, including the Government's Youth Enterprise Fund currently under development, will be assessed, particularly in urban centres.

Given that this is a new area of SP support for the Bank in South Sudan, the aim will be to start small and scale up interventions based on evidence, as appropriate and feasible. Activities will be piloted in both rural and urban areas, contextually customised to take into account key considerations such as local market access and value chain, availability of services, climate change vulnerabilities, and viable livelihood opportunities, among others. To that end, detailed location specific feasibility and market assessments and mapping of existing services and activities (both formal and informal) will be undertaken in each target location, with emphasis given to effective coordination and collaboration with relevant stakeholders to create synergies and avoid duplication.

Component 3: Strengthened Institutional Capacity and Social Protection System

This component will support institutional capacity building for SP and strengthening of the safety net delivery system to serve as the foundation of an eventual government-led national safety net program in South Sudan. Currently, the cash assistance under the SSSNP is being directly implemented through a UN agency, namely UNOPS, which limits the project's ability to invest in national government institutions for capacity building, creating a gap in sustaining the efforts to develop the SP sector started by the SNSDP. However, the shift back to government-led implementation under the proposed SNSOP now provides an important opportunity to continue strengthening institutional capacity and delivery systems to enable the Government to gradually take over in a phased approach the full management and implementation of a nationally owned safety net program. This will not only ensure sustained investment in predictable and reliable safety net provision for human capital accumulation but will also support increased citizen confidence in national institutions by signalling the Government's commitment to supporting the welfare of its people.

Focus will be on enhancing the capacity of the Ministry of Gender, Child and Social Welfare (MGCSW) to enable it to effectively lead and coordinate the SP sector and eventually establish and implement a national safety net program. As such, technical assistance will be provided to the Social Protection department of the MGCSW on the following possible activities: (i) review the National Social Protection Policy Framework (NSPPF) to align it with changing country dynamics and needs; (ii) develop an implementation framework to operationalize the NSPPF; (iii) establish a national high-level strategic governance arrangement for SP; (iv) develop and implement a Capacity Building Plan; (v) provide technical assistance and capacity building (e.g., trainings), as appropriate; and (vi) develop design options of a Government-led national safety net program, among others. Exact activities to be supported for institutional capacity building will be finalised during preparation, and will serve as the first phase of efforts, which will lay the foundation for the development and roll out of a nationally owned safety net program under the second phase.

Support will also be given to further strengthen the key safety net delivery tools and serve as the backbone of the eventual Government-led national safety net program, to be managed by the Social Protection department. Specifically, the component will enhance the existing Management Information System (MIS) and community-based Grievance Redress Mechanism (GRM). For the MIS, focus will be on supporting innovative options for the Social Protection department to manage the MIS for transparent and effective delivery of safety nets, given the effort and time that will be required to sufficiently build the department's capacity to host and manage the MIS on its own.

Attention will also be given to integrating an M&E system within the MIS and supporting data deduplication with partner MISs. Technical assistance may also be provided to support the development and roll-out of an integrated beneficiary registry to enable shock responsive safety net and linkages with social services through rapid and cost-effective identification of beneficiaries, pending availability of additional funding, possibly through the proposed Multi-Donor Transition Trust Fund. For the GRM, focus will be on continuing to strengthen community sensitization and awareness building and social accountability measures for GBV prevention, risk mitigation and response, building on the ongoing SSSNP efforts and GBV analytical work undertaken by the World Bank.

Component 4: Project Management, Monitoring and Evaluation, and Knowledge Generation

This component will support the day-to-day project management, monitoring, and coordination, as well as broader knowledge generation. Thus, it will support the on boarding of necessary human resources and technical assistance to implement the envisioned activities. It will also ensure that robust monitoring and supervision arrangements are established, including a third-party monitor (TPM), to track progress, take stock of implementation experience, and identify challenges for timely response and course correction. Further, this component will support coordination and collaboration with partners to leverage existing efforts for maximum impact. Related, it will include a strong learning agenda to take stock of lessons learned and experiences of particular aspects of the socioeconomic interventions to facilitate the scale-up of activities. In addition, while it is not anticipated that a rigorous impact evaluation will be undertaken given insecurity and access challenges as well as the funding limitations and short project duration, some form of process evaluation and qualitative assessments of impacts will be undertaken to learn from the

implementation experience. Specific details and nature of the monitoring and supervision arrangements, as well as assessments and evaluation to be undertaken, will be further clarified during preparation.

1.4 Project Management Structure

MAFS will maintain a PCU and will use direct contracting to bring in lead technical partners for implementation while the United Nations Office of Project Services (UNOPS) will focus on much of component 1.

To ensure coordination among the PCU and the lead technical partners, MAFS will lead a steering committee to formulate annual work programs (AWPs), track project progress, and resolve technical design issues. The steering committee will include the leadership from MAFS, PCU staff, staff from the lead technical partners, and other members as determined by the core members. The committee will meet to formulate the first AWP and then at least quarterly thereafter.

1.5 Rationale of the Labour Management Procedures

The LMP needs to meet the World Bank's Environmental and Social Framework (ESF) requirements, specifically Environmental and Social Standard 2: "Labour and Working Conditions (ESS2)" and Environmental and Social Standard 4: "Community Health and Safety (ESS4)". This LMP sets out the terms and conditions of employment for employing or otherwise engaging workers on the project, specifies the requirements, standards to be met, policies, and procedures to be followed, assesses risks, and proposes implementation of compliance measures. The LMP is developed to help avoid, mitigate, and manage risks and impacts in relation to project workers and ensure non-discrimination, equal opportunity, protection, fair treatment, and safe and healthy working conditions. The LMP is a living document to facilitate project planning, preparation, and implementation. It is anticipated that the LMP will be updated as additional information becomes available during project implementation, including in relation to workforce numbers and requirements, timing of project activities, and associated due diligence and social risk management.

The LMP identifies the labour requirements and risks associated with the project. It is expected that the LMP and the procurement documents will inform each other and key aspects of the LMP will be incorporated as contractual obligations of private sector, cooperatives, contractors and subcontractors. This LMP is developed for the components responsible under the proposed SNSOP.

The main objectives of WB ESS 2 are the following:

- To promote safety and health at the work place.
- To promote the fair treatment, non-discrimination, and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labour and child labour.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.

To provide project workers with accessible means to raise workplace concerns.

The main objectives of WB ESS 4 are the following:

- To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from routine and non-routine circumstances.

- To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.
- To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.
- To have in place effective measures to address emergency events.
- To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.

2. OVERVIEW OF LABOUR USE ON THE PROJECT

The World Bank’s ESS2 (Labour and Working Conditions) and ESS4 (Community Safety and Health) were identified as applicable for the project. The purpose of the Labour Management Procedures (LMP)—developed in accordance with the requirements of ESS2—is to set out the ways in which project workers will be managed in relation to the associated risks and impacts. The objectives of the LMP are to:

- (a) Identify the different types of project workers who are likely to be involved in the project.
- (b) Identify and assess the labour related risks and impacts for project activities.
- (c) Set out procedures to meet the requirements of ESS2, ESS4 and of the applicable national legislation.

The LMP will be applied with due consideration of the requirements of national laws, the interrelatedness of ESS2 with other Environmental and Social Standards in general and ESS4 in particular.

2.1 Type of Workers

ESS 2 categorises the workers into direct workers, contracted workers, community workers, and primary supply workers (i.e., suppliers of goods). The LMP will apply to project workers including full time, part-time, temporary and seasonal. The SNSOP will involve the following types of workers:

Direct Workers. These are workers employed and paid directly by the project. They may include government civil servants seconded to the project, but their status as civil servants are unaffected by the secondment. This is subject to the terms and conditions as governed by South Sudan’s Constitution (2011) and the Civil Service Act (2011). They are usually available at project inception and stay until the project closes, giving guidance to all project units.

Contracted Workers. People engaged through third parties, in particular UNOPS as the lead technical partner, to perform work related to core functions of the project. The category includes field personnel directly contracted by UNOPS and based at various project sites within the states/counties. Employees of other implementing partners (including NGOs) that UNOPS contract to implement project activities are included under this category. These categories of employees are usually associated with the Project Implementation Partners. Most of them are brought on board when specific components are ready for execution. Once a specific component is completed the project tends to lose some of these employees as the project moves towards completion.

Primary Supply Workers. People engaged by MAFS/ UNOPS as primary suppliers. These include, for example, suppliers of construction materials including aggregates, bitumen and precast concrete interlocking blocks or other goods required. This group of employees usually come at the beginning of the project where procurement is massive. Their stay is short term as it deals with delivery of supplies and they are not permanently stationed in the project.

Community Workers. People employed or voluntarily engaged in providing labour-intensive public works (LIPW). These will include community members who will be working in pasture restoration, tree nursery

establishment, construction of irrigation infrastructure to support vegetable production, and soil and water management. These categories of workers are usually associated with Component 1 of the project and are likely to be with the project for the duration of Component 1

2.2 Labour Requirement Forecast

SNSOP will be implemented by MAFS, with UNOPS as the lead technical partner for Component 1, and with contracted implementation partners (IP) supporting delivery of certain activities. ESS2 applies to all project workers, including full-time and part time contracted and direct hire workers.

The table below gives an overview of indicative labour use in the project.

Table 1: Labour Requirement Analysis

Type of project workers	Characteristics of project workers	Timing of labour requirements	Indicative number of workers
<ul style="list-style-type: none"> Direct workers PCU permanent staff/ consultants 	Government civil servants and experts in MAFS	Throughout project implementation	PCU: 16 workers – Program Director; Project Officer; Accountants (2); Senior Procurement Specialist; Procurement Officer; Procurement Assistant; Senior Financial Management Specialist; Finance Officer; Environmental Specialist; Social Specialist; Gender Specialist; Monitoring & Evaluation Specialist; MIS Specialist; Knowledge Management Specialist; and Data Assistant.
Contracted workers <ul style="list-style-type: none"> Other NGOs implementing partner / contractor staff UNOPS permanent staff, field staff, consultants and support staff 	<ul style="list-style-type: none"> Short term consultants: experts specific thematic areas recruited for short term assignments Support staff includes administrative staff (procurement, financial management, human resources), drivers, guards, etc. Skilled permanent staff of the primary contractor (implementing partners/NGOs, consulting company, construction company): most likely national staff involved in community mobilisation, 	<ul style="list-style-type: none"> International and national experts, field workers and support workers: throughout project implementation Short term consultants on need basis (few weeks or few months) Other IP / contractor staff: Duration of several months to several years specified by contract or letter of agreement signed with 	UNOPS: 200 Workers - Project Manager, Social Risk Management Officer; Environmental Risk Management Officer; Gender Officer; Emergency Specialist; Engineering Officer; GIS Officer; Monitoring & Evaluation Officer; M&E Associates; Emergency Reporting Officer; Admin & Finance Officer; Strategy & Resource Planning Officer; Procurement Officer; HR Consultant; Logistics Officer; Communications & Visibility Officer; Radio Programming Officer; Admin/Finance/HR Assistant; Operations Associate; Logistics Assistant/ Warehouse/Storekeeper; Security Assistant ; Drivers The IP workers will be identified during the project implementation stage.

	<ul style="list-style-type: none"> • Skilled workers engaged by sub-contractors for construction work. • Employees of third-party monitoring agency / contractor • Unskilled community members engaged by contractors: Most likely local workers 	implementation partner / contractor.	
Primary supply workers Workers engaged by primary suppliers	Most likely local workers	Project implementation	Primary Suppliers: 50 Workers: These will include but will not be limited to personnel of the payment service providers, Third Party monitoring agents and suppliers of other goods and services necessary for the project. Other primary supply workers will be identified during the project implementation stage.
Community workers	This is labour that can be made available by the community for the benefit of sub-projects (paid and in-kind contributions to community activities)	Project implementation	Beneficiary households for labour-67,200 workers: intensive public works. The community workers will be identified during the project implementation stage and the LMP will be updated accordingly

Note: Based on the experience from previous projects all workers will be over 18 years old.

3. ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

The SNSOP activities are centred on providing various types of support to address immediate food security needs of affected vulnerable households through direct income support, this implies that an important part of project support is in human development / soft interventions. However, part of the support will also include physical interventions in LIPW as per community needs such as construction of dykes, drainages, road openings etc. An assessment of the risks and impacts related to working conditions and protection of the workforce, in accordance with the requirements of ESS2 of the Environmental and Social Framework of the World Bank, has highlighted potential issues in the table below.

Table 2: Labour Risk Identification and Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
ESS2: Labour and working conditions		
Labour standards are not in accordance with	There are some gaps between South Sudanese labour laws and international standards / ESS 2 (for example, in regard to child labour, see	The gaps are addressed through the implementation of this LMP . UNOPS employment procedures are in line with national regulations and UN standards.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
national laws and international standards	below “Legal and policy review and legal gap analysis).	
Labour disputes over contracts	Given the generally high conflict potential, it is possible that disputes over contracts emerge	The Project will provide workers’ GRM with additional support from sector specific institutions, an independent legal third party or courts for cases unresolved within the GRM.
Deployment of immigrant/migrant workers without required permits	Migrant workers in the construction sector fill significant amounts of unskilled jobs. These require work permits, which can be subject to lengthy processes. The risk is therefore substantial that local contractors contract migrant workers without appropriate permits in the country.	The project will largely prioritise employees and workers hired locally to strengthen local ownership and benefits, especially for soft interventions such as community mobilisation, extension, etc. For construction work, and where that is not possible, it will be ensured that workers from abroad have the appropriate permits, including through provisions in the contractual arrangements. Companies found to have undocumented workers will risk financial penalties and contract loss.
Poor working conditions and unsafe work environments due to poor indoor air quality, lack of access to potable water, poor waste management etc.	Due to the protracted conflict in South Sudan and the weakness of formal justice institutions, employees’ working conditions are poor and the project needs to ensure that such working conditions are not accepted. The impact is significant in that it may manifest in exploitation of the very community that the project intends to benefit, community workers, but also contracted workers may be affected.	Supervision of Labour Management Practices for contractors, community workers, and also direct workers and consultants is essential to mitigate against risks related to Occupational Health and Safety (OHS). An example of a contractor checklist is presented in Appendix 4, and will be tailored for use by other groups of workers i.e., direct workers, community workers and service provider contracts.
Poor working conditions: lack of workers’ rights	Labour laws in South Sudan have been criticised for their lack of enforcement. This is not surprising given that the formal justice sector is generally extremely weak.	The project therefore needs to ensure, through rigorous workers’ grievance mechanisms, that workers can articulate violations of their rights and receive redress. There will be additional support from sector specific institutions, independent legal third parties, or courts for cases unresolved within the GRM.
Discrimination against women in employment	In most rural communities in South Sudan, women typically carry out household work owing to the general perception that men go to formal work while women and girls assume household duties. Therefore, the risk of discrimination in recruitment and employment of women is important. If there is no deliberate effort by the project to encourage the local women to thrive in contracted work or community work, the risk of missing them as beneficiaries of potential employment is	Contractors are compelled to safeguard the interests of women, including gender parity at the workspace, by prohibiting, preventing and punishing sexual harassment and other forms of GBV towards female workers by other project workers, appropriate sanitation facilities at workplaces, and appropriate PPE for women. The project has prepared an Action Plan to Address Gender-Based and Child Violence, Sexual Exploitation and Harassment against Women and Children to

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
	substantial. There is also a high incidence of sexual harassment of female workers by other workers.	guide the SH/SEA and gender parity issues in project intervention areas.
Worst and hazardous forms of child labour	The general minimum age for work is 14 (which is in accordance with ILO standards on minimum age where a country's economy and educational facilities are insufficiently developed). However, the Labour Act lacks clarity on prohibitions on the worst forms of child labour. Article 12(2) could allow children between the ages 14 and 17 to engage in the worst forms of child labour, violating international standards. There is therefore a substantial risk that children between 14-17 could be engaged in the worst forms of labour, which could include hazardous work. Worst and hazardous forms of child labor include working more than 8 hours a day; lifting heavy loads; working under heat stress; working at equal capacity with adults	The project will not recruit or hire any employee below the age of 18 and will enforce this measure through direct UNOPS recruitment as well as through its implementing partners and contractors.
Injuries at the workplace arising from fire, poor indoor air quality, poor waste management, travel between sub-project sites etc.	The risk comes from the fact that appropriate OHS practices and equipment including PPE may be scarce for contracted workers or community workers, and health and safety regulations may not exist sufficiently or not be enforced.	Occupational risk assessments and mitigation plans will be devised and implemented to provide response and service for workplace injuries across all categories of workers including direct workers, community workers, and contractors. Training on appropriate OHS will also be provided to farmer organisations and farmer households, to mitigate risks arising from unsafe practices related to use of tools and machinery to be financed by the project.
Insecurity due to targeting of project staff and escalated conflict in project locations	Some of the target counties are located in areas with perpetual fears of insecurity.	MAFS, through UNOPS, will implement a Security Management Plan (SMP) to ensure the security of the workers. Any security workers to be involved in the SNSOP activities will be sensitised and trained on GBV/SEA/SH requirements.
Abusive force by security agents towards members of communities/ community workers	The risk comes from the presence of security agents in the communities as part of efforts to ensure safety of project staff and assets, particularly during cash payments.	Security agents will only be deployed when absolutely necessary based on results of risk assessments in each project location. Background checks of security agents upon hiring, and regular training on the use of forces will be carried out in line with the Security Management Plan. Specific protocols will also be developed to guide the interaction of security agents with communities.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
ESS4: Community Safety and Health		
Labour influx and GBV	There is likely to be internal movement of people from areas outside the project areas to seek employment and associated benefits from within targeted communities. Furthermore, contracted workers may be brought into communities to conduct construction works. Population movement due to labour influx may result in GBV/SEA cases.	MAFS and all implementing partners and contractors will implement the Labour Influx Management Procedure (see below); a Framework for Violence and Harassment Protection Plan for Women and Children will be implemented (see separate plan as part of the ESMF).
Potential accidents caused by project vehicles, potential disease vectors from water ponds and irrigation systems, spread of diseases in communities including COVID-19, HIV etc. through labor influx	Population movement due to labour influx may result in the spread of HIV and other diseases.	MAFS and all implementing partners and contractors will implement the Labour Influx Management Procedure (see below), including sensitization on preventing common diseases. Communication of risks will be conducted through locally appropriate means – targeting specific social groups and genders.
Potential targeting of non-eligible households participating in LIPW	The risk comes from armed groups that may want to target beneficiaries receiving cash payments for purposes of forcefully taking money paid to them for participating in LIPW. This is exacerbated by logistical constraints in areas with underdeveloped physical and virtual infrastructure.	MAFS and UNOPS will ensure that the SMP is implemented and cash is distributed within the communities in secure locations, with minimal advance notice given prior to distribution to minimise risks of mobilisation by armed groups. Continuous risk assessments will be undertaken by UNOPS, and cash transfers will be halted at the first sign of a deteriorating security situation. The risk of cash handling will be transferred to an experienced financial service provider.
Risk of labor abuse	Under payment, overworking workers, delayed payments, GBV/PSEA/SH, uncondusive working environment lack lack of PPEs, working under heat stress,	Proper criteria and procedures, compliance wo ESS2 requirements

4. BRIEF OVERVIEW OF SOUTH SUDAN LABOUR LEGISLATION

4.1 International Labour Legislation

South Sudan has been a member of the International Labour Organisation (ILO) since 2012. The country has ratified 7 out of 8 fundamental conventions of ILO, including the following:

- *Forced Labour Convention, 1930 (No.29) (ratified in 2012)*
- *Right to Organise and Collective Bargaining Convention, 1949 (No.98) (ratified in 2012)*
- *Equal Remuneration Convention, 1951 (No.100) (ratified in 2012)*
- *Abolition of Forced Labour Convention, 1957 (No. 105) (ratified in 2012)*
- *Discrimination (Employment and Occupation) Convention, 1958 (No. 111) (ratified in 2012)*
- *Worst Forms of Child Labour Convention, 1999 (No. 182) (ratified in 2012)*
- *Minimum Age Convention, 1973 (No. 138) (ratified in 2012) Minimum age specified: 14 years*

4.2 National Labour Legislation

The Transitional Constitution of the Republic of South Sudan (ratified in July 2011 and amended in 2015) provides the legislative framework for labour issues. The public service or public institutions are governed by the Civil Service Act 2011 (Law Number 11) that covers wages, rest, leave, benefits in case of employment related injuries.

The Labour Act (Act No. 64 of 2017) establishes a legal framework for the minimum conditions of employment, labour relations, labour institutions, dispute resolution, and provisions for health and safety in the workplace. It further reinforces the right to equal access and remuneration for work of equal value as guaranteed by the constitution.

- **Freedom of Association:** Section 9(1) of the Labour Act provides that “All employees and employers, without restriction whatsoever, shall have the right to establish and, subject only to the rules of the trade unions or Employers’ Association concerned, join trade unions or Employers’ Association of their own choosing.”
- **Non-discrimination:** Section 6(1) of the Labour Act provides that: *‘No person shall discriminate, directly or indirectly, against an employee or job applicant in any work policy or practice’*. Section 6(2) also forbids discrimination by any Trade Union, Employers Association, or Federation. Section 6(3) defines discrimination as *‘any distinction, exclusion or preference with the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation’* based on a series of grounds including sex and pregnancy or childbirth.
- **Sexual Harassment:** Section 7 provides that *“No person shall sexually harass an employee or an employer”* and that *“employer shall ensure that no person shall sexually harass an employee in the course of such employee’s work for the employer”*.
- **Prohibition of forced labour:** Section 10 prohibits forced labour: *“No person shall engage in the recruitment or use of forced labour or assist any other person to engage in such activities”*. And emphasise that recruitment of children for use in armed conflict shall be deemed to be forced labour.
- **Minimum age of work:** As per Section 12 of the Labour Act, the general minimum age for work is 14 and 12 for light work (which is in accordance with ILO standards on minimum age where a country’s economy and educational facilities are insufficiently developed). Nevertheless, Article 12(2) allows children between the ages 14 and 18 to engage in the worst forms of child labour, violating international standards: “no person shall engage or permit the engagement of a child under the age of 14 years to perform works defined under section 13 as worst forms of work”. Compulsory education age (13) is inconsistent with minimum age for work (14).
- **Health and Safety:** Chapter XI of the law states safety, health and welfare at the workplace.
- **Minimum Wage:** The Council may recommend to the competent authority the review, adjustment and fixing of the minimum wage/salary, taking into account: (a) the basic needs of employees; (b) the general level of wages/salaries in the country; (c) the cost of living and changes in such cost; (d) the

level of productivity; and (e) any other factor that the Council may deem fit; The Minister shall publish the minimum wage, as adjusted and fixed following recommendation by the Council, in the official gazette or in any public media as the Minister may determine, South Sudan Labor Act, (2017, Sec 50).

- Working Hours: The normal working hours for an employee shall not exceed 8 hours per day and 40 hours per week. An employer may require employee to perform more than eight normal working hours for one or more days per week, provided that the normal working hours of employees not engaged in shift work shall: (a) not exceed nine hours in a day; (b) proportionately reduced on other days in the week such that the working hours of an employees do not exceed forty hours in a week. The normal working hours of an employee engaged in shift work shall not exceed forty hours when averaged over a three-week period.
- Over Time: where an employee works beyond the maximum normal working hours as provided in section 56 of this Act, the extra working hours shall be considered overtime.
- Break Rest: An employer shall give an employee who works continuously for more than five hours, a break rest meal for at least one continuous hour with pay.
- Annual Leave: An employee is entitled to annual leave with full pay as follows: (a) after continuous service of one year or more but less than three years, twenty-one working days per year; (b) after continuous service of three years or more but less than fifteen years, twenty-five working days per year; and (c) after continuous service of fifteen years or more, thirty working days per year.
- Maternity Leave: Sec 64 of the South Sudan Labor Act (2017) states that female employees are entitled, on each occasion she is pregnant and delivered a baby, to 90 days maternity leave with full pay; and 45 days for breastfeeding while working for half day.
- Paternity Leave: While for a male employee is entitled, on each occasion that his wife is pregnant and delivers a baby, to two weeks of paternity leave on full pay, to be taken (Sec 65, South Sudan Labor Act 2017).
- Termination and retrenchment: Sections 72 to 78 of the South Sudan Labor Act (2017) states that an employer shall issue a notice of termination for an employee(s). These shall indicate the reasons for the termination by the employer (sec 73); termination for incapacitation (sec 74); unsatisfactory performance (sec 75); gross misconduct (sec 76); redundancy (sec 77); death (sec 78).

While the Labour Act provides additional protections for children, it lacks clarity on prohibitions on the worst forms of child labour. The Labour Act is broadly consistent with the ESS2, but there is a significant gap in the enforcement aspect of the legislation.

The Child Act (Act No. 10 of 2008), particularly section 25, prohibits child labour and outlines protections for children and young persons from hazardous child labour.

“Child labour” includes:

- a. Work and activities related to mining and quarrying;
- b. Portage of heavy loads and storage;
- c. Heavy agricultural labour;
- d. Construction work;
- e. Work in industrial undertakings;
- f. Work in places where heavy machines are used;
- g. Work in places such as bars, hotels and places of entertainment, where a person may be exposed to immoral behaviour;
- h. Work in electricity, gas, sanitary and water works;
- i. Service with the police, prison or military forces;
- j. Night work which constitutes work between the hours of six o'clock in the evening to six o'clock in the morning;
- k. Driving or touting in vehicles;

- l. Herding which jeopardises the interest of the child;
- m. Any type of sexual work; and
- n. Tobacco production and trafficking.

In line with the minimum age for employment stipulated in the Labour Act, and also in the Child Act, it is mandatory for employers to get satisfactory proof of a child's age before engaging them in employment. Those engaged in paid employment have the right to be paid fairly, work reasonable hours in accordance with their age and capabilities, have at least 24 hours weekly mandatory leave, annual leave and to take regular recreational breaks.

Despite the Child Act prohibiting the engagement of children in military activities, the national army and opposition groups continue to recruit, sometimes forcibly, children to fight. Children are further engaged in other worst forms of child labour, including in commercial sexual exploitation. The government has failed to bring any perpetrators to justice¹. Children between the ages of 10 and 14 are further employed in agriculture and industry and services, including in rock breaking, construction (building and transporting materials), and brickmaking.

5. INSTITUTIONAL ARRANGEMENTS FOR IMPLEMENTATION OF LMP

This section lays out the operational arrangements amongst the various institutions that are collaborating with the SNSOP to ensure the smooth implementation of the LMP. The requirements of the LMP apply to all categories of Project employees and workers.

The requirements of the LMP as applicable to the direct workers will be under the responsibilities of MAFS through the PCU.

The requirements of the LMP as applicable to the contracted workers will be under the responsibilities of UNOPS through the South Sudan Human Resource (HR) Unit with supervision Unit in South Sudan. The HR unit will be responsible for managing and implementing employment policies, guidelines and procedures, including equal opportunity employment. Their role ensures compliance with South Sudan national labour laws, WB ESS2 and ESS4, and UN agency regulations with respect to recruitment, management and termination of engagement. UNOPS has the responsibility to ensure LMP implementation at the interface with all contractors (implementing partners) through the Procurement Team, which is responsible for managing vendor contracts and Letters of Agreement (LoAs).

Where contractors engage community workers directly in rehabilitation or construction activities, they are responsible for the full implementation of the requirements of the LMP as it applies to community workers in relation to ESS2, while UNOPS will exercise oversight over labour management processes.

The primary suppliers are identified at the subproject level by MAFS or UNOPS (implementing partners) or directly during subproject screening, and the applicability of the LMP will be affirmed at that time. MAFS has the mandate to ensure that all the procedures for primary supply workers are observed, though the PCU will have the overall responsibility for?. ESS2 applies a proportionality approach to oversight responsibility towards suppliers.

The project will employ Environment, Social and Safety Officers at field level who will be the custodians of the LMP. The project will engage the lower institutions in training on LMP. These include the County Core Team, Payam Development Committees, Boma Development Committees/ Quarter Council committees

¹ South Sudan – on advancement – efforts made but complicit in forced child labour, accessed at: <https://www.refworld.org/pdfid/5bd05af20.pdf>

and Community Supervisory Committees and Group Leaders. This will enable them to be aware of LMP, provide corrective measures in project implementation in case of noncompliance.

6. KEY PROCEDURES

The SNSOP will promote sound worker-management relationships and enhance the developmental benefits of the project by treating workers in the project fairly and providing safe and healthy working conditions. MAFS, UNOPS, IPs, contractors and all project workers will be accountable for ensuring the full accomplishment of the objectives of ESS2 and ESS4.

The specific employment? Terms and Conditions for the different categories of project workers and different types of activities will be defined in the inception phase of the project. In case of variations between the WB ESSs, South Sudan national and UNPOS requirements, the more stringent provision or the WB standards will apply.

Labour management responsibilities will be shared across activities, with the UNOPS Social Risk Management Officer and UNOPS Health, Safety, Social and Environment Specialist acting as focal points for each Implementing Partner (IP) , in coordinating the tasks below. These officers will liaise with the Social Specialist in MAFS PCU for reporting and oversight purposes.

Table 3: Key Responsibilities under Labour Management Procedures

Task	UNOPS	IPs	MAFS PCU
Recruitment, placement and induction of project workers and employees in a transparent and non-discriminatory manner	R	R	I & A
Identification of community workers for LIPW	C	C	I & A
Beneficiary registration into the system	R	R	I & A
LIPW implementation and attendance marking	I	I	I & A
Management of occupational health and safety measures	R	R	I & A
Process payments to the beneficiaries using the submitted attendance registers.	R	R	I & A
Reconciliation of payments and sharing of data with UNOPS	R	R	I & A

Handling of feedback and complaints from community workers and project affected communities regarding payments	R	R	I & A
Handling of feedback and complaints from community workers and project affected communities regarding all other issues	C	C	I & A
Handling of feedback and complaints from respective contracted workers regarding working conditions and other employment related issues including SEA and SH	R	R	I & A
Handling of feedback and complaints from government workers			R
Management of Implementing Partners and Contractors to ensure compliance with LMP	R	R	I & A
Management of security risks to project workers	R	R	I & A
Report to the World Bank on labour and OHS performance and key risks and complaints	C	C	R
R	Responsible for completion of task/deliverable		
A	Accountable for completion of the task		
C	Consulted by those responsible for advice and expertise		
I	Informed on progress and notified when tasks are completed		

6.1 Recruitment and Placement

The objective of this procedure is to ensure that the recruitment process and placement of project workers and employees are conducted in a manner, which is non-discriminatory, and employees are inducted to all essential work-related matters. The procedure is as follows:

- i. MAFS PCU identifies suitably qualified staff to join the PCU, with recruitment of new staff where necessary in line with the provisions of the Civil Service Act and Constitutional provisions.
- ii. Relevant UNOPS units and Contractors submit a recruitment plan to the Human Resource Officer for review and approval, showing number of staff required; intended working conditions; intended locations of staff; and job specifications in terms of qualification and experience.
- iii. UNOPS unit and Contractor publish the job invitation in the appropriate media (local press or direct invitation for contracted worker, or word of mouth through local leaders for community workers) to ensure all potential candidates have access to the information, including women and persons with disabilities, actively addressing risks of nepotism, or other forms of recruitment or employment discrimination by?.
- iv. Shortlist and recruit candidates, screen out candidates under the age of eighteen years, and strongly encourage women to apply. For a similar competence and experience, women would be preferred.
- v. On recruitment, ensure a contract of employment, which includes a code of conduct, is signed voluntarily, for both contracted workers and community workers.
- vi. For community workers, contractors will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent by appending their signature against the resolutions or signing the attendance register of the meeting which made the employment resolutions.
- vii. Before commencement of work, the contractor will ensure the employee is inducted on the essential work-related issues including: Key Job Specifications; Terms and Conditions of Employment; Special Codes of Conduct; Disciplinary Procedures; Workers' Grievance Mechanism; Freedom to join and participate fully in Workers Association activities, Employment Council or Trade Union; Key Environmental and Social aspects of the SNSOP and the ESMF, OHS guidelines Job hazard assessment; and Emergency Preparedness.
- viii. Maintain all such employment records available for review by the PCU, the World Bank, or Ministry of Justice.

6.2 Implementing Partner/Contractor Management

The objective of this procedure is to ensure that UNOPS and IPs have contractual power to administer oversight and action against contractor (including consultants and service providers) non-compliance with the LMP. The procedure is as follows:

- i. UNOPS shall avail all related documentation to inform the contractor about their requirements for effective implementation of the LMP including OHS.
- ii. Before submitting a bid for any contracted work, the contractor shall incorporate the requirements of the ESMF, SA and the LMP into its bid.
- iii. Contractor to formulate, implement and review contractor specific management plans (C-ESMPs) as required by the ESMF and specifically the LMP including: OHS plans; Labour Recruitment Plan; Code of conduct for employees; Waste management plan; and Emergency plan.
- iv. Contractor to submit as required by UNOPS or IP, the progress reports on the implementation of the LMP and allow UNOPS or the IP access to verify the soundness of the contractor's implementation of the requirements of the LMP.
- v. Where appropriate, UNOPS or the respective IP may withhold contractor's payment until corrective action(s) is/are implemented on major non-compliance to the LMP. The following are some of the major areas of non-compliance that contractors need to take note of (comprehensive list is in Appendix 4);
 - Failure to submit mandatory quarterly progress report
 - Failure to avail for inspection specified documentation pertaining to the implementation of the ESMP, C-ESMP and LMP
 - Failure to timely notify and submit incident and accident investigation report

- Failure to appoint or replace a competent and experienced EHS officer
 - Failing to enforce C-ESMPs including provision of adequate appropriate PPE
 - Recruitment of non-technical staff from outside the local community.
- vi. Valid employment contracts: Project workers should be provided with valid employment contracts that clarify terms and conditions of work, employee rights (including work hours, wages, overtime, compensation and social security benefits or other entitlements regardless of whether the worker is engaged on a fixed-term contract, full-time, part-time, or temporary. Such information should be availed to the employee at the beginning of work.
 - vii. No delay in payment of salaries: UNOPS or IPs shall ensure prompt payment of salaries. Any deduction to be applied should be indicated in the employment contracts or communicated prior to monthly payment. In addition, all employees shall be entitled to rest periods per week, annual holidays and leave days (sick, maternity, paternity and family leave) in accordance with the South Sudan Labor Act 2017 and the LMP.
 - viii. Termination of employment: Where a decision is reached either on a mutual consent or so decided by one party to the contract, termination of employee contract will be made in a written notice. All accrued wages, social security benefits, severance payments, pensions and any other entitlements shall be paid in a timely manner and evidence of payments provided for the worker.
 - ix. Nondiscrimination and equal opportunity: Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. The project is required to prevent and address harassment, intimidation and/or exploitation of workers in accordance with provisions of the South Sudan Labor Act 2017 and the Labor Management Procedures.

6.3 Primary Supplier Management

Primary supply workers are employees of suppliers who, on an ongoing basis, provide goods and services to the project. MAFS and UNOPS have oversight of the implementation of the LMP requirements in this category. The objective of the procedure is to ensure that labour-related risks to the project from primary supply workers are managed in line with the requirements of ESS2. UNOPS will:

- i. Procure supplies from legally constituted suppliers. The legal registration ensures that the company is legally obliged to comply with all applicable labour laws in South Sudan including the Labour Act, which makes it possible to assume mainstreaming of the labour laws within the supplier's firm. This will include ensuring evidence of: Certificate of Incorporation; Tax Clearance; Value Added Tax Certificate; and Registration of supplier with regulatory body for the goods or services where required.
- ii. Carry out a physical check on the supplier's labour management system including: employee contracts; occupational safety and health; any past work-related environmental or occupational incidents; and workers' committee in place.
- iii. Check products quality certification and environmental rating where required.
- iv. Commit to take back waste for reuse, for example, containers and packaging where applicable.
- v. Explore possibility of training in safe use of product by community users where applicable.
- vi. Organise road safety training and additional applicable requirements as needed, such as emergency response equipment, etc.

- vii. For hazardous materials, confirmations of materials are legally authorised, supplier has all necessary permits, and transportation done by authorised personnel and vehicles properly marked with emergency response equipment.
- viii. If applicable for Project, add one training for raw material suppliers such as gravel, sand, etc.

6.4 Community Workers Management

The activities in Component 2 will include the participation of a significant number of community workers in LIPW for pasture restoration, tree nursery establishment, construction of irrigation infrastructure to support vegetable production, and soil and water management. This procedure provides measures to be implemented to ascertain whether the employment terms and conditions have been fully discussed and agreed. Therefore, the objective of this procedure is to ensure the community workers are agreeable to the terms and conditions of their labour. The procedure is as follows:

- i. UNOPS will develop standard TOR, working times (3hrs for women and 4 hrs for men in LIPW), remuneration systems (USD 2.7 per day for 20 days a month for 15 months), methods of payment (cash transfer), timing of payment (after every 15 days), basic OHS work procedure, and community code of conduct (CoC) that will apply to all relevant project activities. These will be developed during the project inception phase.
- ii. UNOPS will produce a plan for identification of households to participate in the LIPW as per agreed criteria with MAFS.
- iii. MAFS, UNOPS will meet and document resolution of meetings with the community on the intended community worker recruitment. The resolution shall include details on;
 - Nature of work
 - Working times
 - Age restrictions (18 and above, and below UNOPS retirement age, verification will be based on ID documentation, and where not available through Affidavits from the *boma* or *payam* chief)
 - Remuneration amount
 - Method of payment
 - Timing of payment
 - Individual signatory or representative signatory of meeting resolution
 - Employment is voluntary
 - Community CoC
- iv. UNOPS will induct community workers on key LMP issues, including;
 - GBV and SEA
 - Workers' and Project GRM
 - Occupational Safety and Health
 - HIV awareness
 - Safe use of equipment and lifting techniques
 - Applicable PPE

6.5 Occupational Health and Safety and Work Environment

The objective of the procedure is to ensure and maintain a healthy and safe work environment for all project workers and the host community. The procedure is as follows:

- i. Project beneficiaries will be trained on appropriate OHS practices to mitigate risks arising from unsafe practices related to use of tools and machinery to be financed by the project, and as part of promoting Good Work Practices.

- ii. For direct workers and consultants, there will be an assessment of office facilities to ensure OHS risks (especially related to man-made (e.g., fires) and natural events (e.g., flash flooding, etc.) are appropriately considered and managed. There will also be procedures to manage OHS risks due to direct workers travelling (via roads) associated with the project. Provision of necessary PPE will be ensured and awareness created on potential OHS risks that may be encountered during project-related site visits.
- iii. Community workers will be trained on appropriate OHS practices to mitigate risks arising from use of various tools and equipment during labour intensive public works.
- iv. On procurement for IPs and contractors, MAFS will avail the ESMF or any subproject ESMP to the aspiring contractors so that contractors include the budgetary requirements for occupational health and safety and community health and safety measures in their respective bids.
- v. The contractors will develop and maintain an occupational health and safety management plan that is consistent with the scope of work, duration of contract, Sudan OHS regulatory requirements, subproject ESMP, WB General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety, and any other conditions in contract bid or contract.
- vi. Contractors will adopt the sub-project ESMPs and where necessary develop Construction Environmental and Social Management Plans (C-ESMPs) to help manage construction risks.
- vii. Contractors appoint an appropriately qualified and experienced Safety Health and Environmental Officer whose responsibilities is to advise the employer on SHE related issues.
- viii. Contractors prepare task specific risk assessment (TRA) and safe working procedures (SWP) for executing works.
- ix. Contractors provide preventive and protective measures, including modification, substitution or elimination of hazardous conditions or substances.
- x. Contractor provides for appropriate training/induction of project workers and maintenance of training records on occupational health and safety subjects.
- xi. Contractor documents and reports on occupational accidents, diseases and incidents.
- xii. Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to: First Aid Attendant and first aid materials; Workplace accidents; Workplace illnesses; Flooding; Fire outbreak; Disease outbreak; Labour unrest; and Security.
- xiii. Contractors comply with all requirements of applicable occupational Health and Safety legislation and Environmental legislation including WB EHS guidelines.
- xiv. UNOPS shall maintain all such records for activities related to the safety, health and environmental management for inspection by the PCU or The World Bank.

Fatality and serious incidents

Severe incidents will be notified to the Bank within 24 - 48 hours after learning of the incident or accident using World Bank Environmental and Social Incident Reporting Template (ESIRT). A detailed report of the incident will be provided within fifteen (15) days of occurrence of the accident. In the event of an occupational fatality or serious injury, the IP / contractor shall report to UNOPS and consequently, UNOPS shall report to the MAFS PCU, for escalation to the Bank as soon as becoming aware of such incidents, and inform the government authorities (where available) in accordance with national reporting requirements (Labour Act Section 115). Corrective actions shall be implemented in response to project-related incidents or accidents. UNOPS in collaboration with the PCU or, where relevant the IP or contractor, will be required to conduct a root cause analysis for designing and implementing further corrective actions.

6.6 Labour Influx Management Procedure

The objective of this procedure is to enable MAFS, UNOPS and all contractors to mitigate the excessive labour influx risks and impacts. The excessive influx of workers and followers can lead to adverse social and environmental impacts on local communities, especially if the communities are rural, remote or small.

Such adverse impacts may include increased demand and competition for local social and health services, as well as for goods and facilities, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, social conflicts within and between communities, increased risk of spread of communicable diseases, and increased rates of illicit behaviour and crime, including GBV cases. The procedure is as follows:

- i. MAFS, UNPOS and their Contractors shall, to the extent possible, reserve all non-technical work for locals and local entrepreneurs (identifiable with the host community and witnessed by host community leadership to maximise employment creation).
- ii. Beneficiary selection and employment recruitment should verify the authenticity of the localness of potential employees.
- iii. UNOPS and Contractors shall liaise with local leadership on enrolment for community workers while at the same time ensuring that no grievances derive from nepotism via utmost transparency in the selection process, announcing hiring campaigns early enough in community consultations and/or other outreach activities.
- iv. Where there are camp establishments, UNOPS and contractors shall ensure camp management and community relations are good. If labour camps are required, special management plans need to be developed, or if smaller , camp management reflected in the ESMP, including; security within camp, social relations with community members should be cordial and consistent with GBV and SEA, waste management, water and sanitation, and proper camp demobilisation.
- v. Establish code of conduct for contract workers' interaction with the host community. This may include:
 - Access to camp by children, non-employed girls and women
 - Appropriate language
 - Time restrictions where required
 - GBV/SEA
 - Good conduct if small numbers of workers are accommodated in communities rather than camps (requirements on when to establish a camp shall be included in the Project Operation Manual)
- vi. UNOPS/ Contractors should have their own supply of, pay for accommodation offered by the community to contracted employees.
- vii. UNOPS/ Contractors shall ensure that local supply shall not negatively impact the availability of resources for the local communities and sourcing of local wildlife shall be prohibited.
- viii. UNOPS/ Contractor shall provide a fully equipped first aid kit.
- ix. UNOPS/ Contractors to mainstream HIV issues in the workplace by providing HIV prevention training during induction and continuously during employment through health and safety talks.
- x. UNOPS/ Contractors to be fully aware of and be ready to implement the Workers' Grievance Redress Mechanism.

6.7 Child Labour

The minimum age of project workers eligible for any type of work under SNSOP (including construction work) is set at 18. The engagement of project workers between the age of 14 and 18 years (in particular, vulnerable individuals such as orphans) while legal for non-hazardous work², will not be allowed under the

² 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.

project so as to mitigate above mentioned risks and not interfere with the child's education and development. To prevent 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 the labour registry of all contracted workers with age verification.

6.7.1 The process of age verification

In order 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 this will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor will be required to maintain a labour registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labour and be documented. Below is indicative age verification means that could be used in South Sudan context where an official ID system is broadly unavailable:

- Check the birthday on official documents such as birth certificate, national ID or other credible records, where available;
- Obtain written confirmation from the medical practitioner;
- Obtain written and signed declaration from the worker and his/her parents or guardian; or
- Inquire with the local community leader, community action group or with other credible community sources.

6.7.2 Responsible remedial measures.

In case a project worker who does not satisfy the age limit is identified working on the project, the employer (contractor, subcontractor or primary supplier) shall be required to terminate the engagement of such a project worker in a responsible manner. Indicative approach may include:

- 1) Offer a project employment to a member of the family who satisfies the age limit in exchange of keeping the under-aged worker away from work.
- 2) If a family member who satisfies the age limit is not available, require the employer (using the contractual penalty provisions) to continue the wage payment to the underage worker without engaging in work for an agreed period.

6.8 Security risks

Considering the significant security risks in some parts of the SNSOP counties, the project will take appropriate and proportionate security measures to minimise the potential risk to the workers, as detailed in the project Security Management Plan. Key security measures will include restrictions on work hours where security risks are higher (such as night time); and measures to maintain low profile of the site and workers (such as the minimum use of sign boards). While security measures to be arranged by public security personnel to address external security risks (such as armed insurgency) will be determined by relevant security authorities in each county, SNSOP will address internal security risks associated with the deployment of such security personnel on 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"*

Workplace Security Risks on Contractors and Workers

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
Project Coordination	<p>-Misunderstandings and/ or disagreements over selection of areas during geographical and administrative targeting could lead to delay or disruption of project activities;</p> <p>-Change in government leaders are likely to trigger insecurity</p> <p>Climate or weather changes may trigger project suspensions e.g. flooding</p> <p>-Politics (power struggles) among different stakeholders at the local level affects project activities</p> <p>-Ethnic tension relating to employment opportunities.</p>	<p>-Regular consultation and timely involvement of relevant stakeholders and government ministries in project implementation;</p> <p>-Develop and implement a local security plan for each county that includes the mapping of project staff, their potential security risks and means of protection;</p> <p>-State-level monitoring of political situation by government and UNOPS</p>	<p>MAFS PCU</p> <p>MGCSW PCU</p> <p>UNOPS PIU</p> <p>Other Implementing Partners</p>

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
Beneficiary target/ Registration	<p>-Intra communal conflicts that can cause displacement might increase vulnerability;</p> <p>-Flooding that can cause threats to the beneficiaries;</p> <p>-Possible Insecurity for the field staff</p> <p>-Attempts/pressure by community leaders for their relatives to be included as beneficiaries may lead to harassment of registration teams</p>	<p>-Timely involvement of all key stakeholders including beneficiary representatives and community leaders;</p> <p>-Using other methods of transport like canoes, motor boats to reach the affected beneficiaries;</p> <p>-Liaise with government, UN and local police in the area on security matters;</p> <p>-Suspension of project activities when there is potential for harm on beneficiaries, project personnel and damage to project equipment;</p> <p>-Constitute a multi stakeholder targeting and registration teams (BRC, QCDC, UNOPS) to reduce incidences of conflict of interest from chiefs and other community leaders.</p>	<p>Community Mobilisation Team</p> <p>FSA/UNDSS</p> <p>Team leader</p> <p>Community Mobilisation Team</p>
LIPWs	<p>Accidents, which may lead to injuries, death, conflicts and loss of property.</p> <p>Theft of tools</p>	<p>Community sensitization, provide first Aid and training on First Aid</p>	<p>Community Mobilization Team and Team leader</p>

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
<p>Payment of beneficiaries</p>	<p>-Delayed payment leading to complaints and conflict</p> <p>-Possibility of increased gender-based violence target on women by men</p> <p>-Risk of theft, robberies and attacks targeted on beneficiaries, the project staff or/and payment agents.</p> <p>-Hard to reach the beneficiaries due to floods and insecurity</p> <p>Potential risk to beneficiaries and local community from the security provider to the PSP (i.e. excessive use of force, human rights abuses, GBV, etc - per ESS4),</p>	<p>-The payment service provider should ensure that the necessary security measures are put in place;</p> <p>-Payment of beneficiaries made on time and if there is any delay should be communicated early enough;</p> <p>-Conduct sensitization on gender-based violence and security issues;</p> <p>-Identifying community GBV focal person</p> <p>-Sensitising the community on financial management;</p> <p>-Finding other means of transport like the use of canoes and motor boats subject to approval by the World Bank;</p> <p>-Obtain security clearance from local police and UNDSS prior to undertaking payment and activities in the field</p> <p>-Suspension of project activities when there is potential for harm to beneficiaries, project personnel and damage to project equipment.</p>	<p>Project manager</p> <p>Payment Service provider</p> <p>Community mobilisation team</p> <p>MAFS and UNOPS Safeguard unit</p> <p>Team Leader /FSA</p>

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
Grievance and Redress	<ul style="list-style-type: none"> -Anticipated increase on gender-based violence targeted on female beneficiaries -High level of insecurity that might hinder the implementation of activities. -Displacement of beneficiaries due to floods and insecurities. 	<ul style="list-style-type: none"> -Community sensitization should include male community members. -Training of GBV focal person on early and confidential reporting of GBV cases -Create awareness on GBV protection and prevention. -People living with disabilities, elderly and women should be represented in the Appeal Committee and their issues highly considered. 	MAFS and UNOPS Safeguard units
Storage of tools and chemicals	<ul style="list-style-type: none"> - Tools may be stolen in the stores -chemicals (e.g., pesticides), paints and fuel and oil products may leak and cause harm to workers and security guards 	<ul style="list-style-type: none"> - Tools and chemicals should be properly stored - Train security personnel and community members on handling of tools and chemicals 	IPs, Community Mobilizers, Team Leaders

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
Procurement and distribution of LIPWs Tools	Administrative routines may increase delays in the procurement processes and affect project implementation leading to conflicts	<ul style="list-style-type: none"> -Exercise quality control on all aspects of the procurement process, including developing ToRs, technical specifications, bidding documents, proposals, request for quotations, evaluation, and award - Monitor, on a regular basis, the Procurement Plan implementation and set up a close follow-up in relations with beneficiaries and official bodies involved to ensure that appropriate actions are taken on time 	Procurement and distribution of LIPWs Tools
Compliance to COVID 19 SOPs	<ul style="list-style-type: none"> -Stigmatization/ victimization of the project staff by the community members assuming that they are the ones spreading Covid-19; -Community members resisting to observe the SOPs 	<ul style="list-style-type: none"> -Continuous sensitization and awareness on the dangers and risks of Covid-19 and the importance of observing the SOPs -Coordination and collaboration with state public health authorities; -Provision of PPEs such as face masks to the project staff, beneficiaries and committee members. 	Compliance to COVID 19 SOPs

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
Land acquisition and access to land for project activities	<ul style="list-style-type: none"> -Conflict over land trespass -Destruction of private property like crops during LIPWs; 	<ul style="list-style-type: none"> -Proper acquisition of land following voluntary land donation guidelines including consent of all land user households; -Consultations of beneficiaries and communities with landlords, land users, and chiefs for the allocation of land; -Signing of lands consent document following voluntary granting of land by all land users; -Communication in locally appropriate ways how land is acquired; <p>Communicate and implement GRM</p>	<p>Community Mobilisation team</p> <p>MAFS/UNOPS Safeguards unit</p>
Health and safety in the workplace	<ul style="list-style-type: none"> - Accidental injuries from use of tools, - Biological hazards from wild beasts e.g. snake bites - Mud flows, landslides may injure workers, - Risk of wildfires, floods 	<ul style="list-style-type: none"> - Proper operation and maintenance of work tools - Proper use of PPEs - Avoid heavily weak soils in steep areas, - Early and monitoring <p>Training and awareness sessions</p>	<p>Community Mobilisers, Team Leaders</p> <p>MAFS/UNOPS Safeguards unit</p>

Task/ Activity	Potential Hazards/Risks	Mitigation Measures	Responsibility
GBV/ PSEA/SH	<p>SEA</p> <ul style="list-style-type: none"> - Exploitation of a vulnerable position, - Use of differential power for sexual purpose; - Actual or threatened sexual physical intrusion; <p>Workplace sexual harassment</p> <ul style="list-style-type: none"> - Unwanted sexual advances; - requests for sexual favours, sexual physical contact; <p>Human trafficking</p> <ul style="list-style-type: none"> - Sexual slavery coerced transactional sex, - Illegal transnational movement of people; <p>Non-SEA:</p> <ul style="list-style-type: none"> - Physical assault, psychological or physical abuse, denial of resources, - Opportunities or services, IPV. 	<ul style="list-style-type: none"> - Community awareness on SEA/SH - Legal penalties for the perpetrator, referral pathway for the survivor - Training on self-defense, reporting intrusion timely - Reporting perpetrators for disciplinary measures - Training on (abstinence, being faithful, condoms ABCS) - Mainstreaming GBV in all project activities - Provision of first kits (prophylaxis, psychological counselling / trauma management) - Criminalise slavery and report to police, rescue victims where possible - Establishment of a functional GRM system - Wider dissemination of GBV/ PSEA/ SH information to increase awareness 	<p>Community Mobilisers, Team Leaders</p> <p>MAFS/UNOPS Safeguards unit</p>

6.9 COVID-19 prevention measures

Protection against possible COVID-19 related risks will be managed through:

- Provision of information on appropriate work practices such as use of PPE, hygiene maintenance and physical distancing to all project workers, implementing partners and contractors through training and information posters.
- Provision of appropriate PPEs for all project workers.
- Provision of hand washing stations and hand sanitiser for all project workers.
- Planning schedules for labour-intensive public works to avoid overcrowding in work locations, for example, by developing work shifts with a designated maximum number of workers on a site during any one shift.
- Ensuring access to medical facilities where necessary, in the case of Covid-19 symptoms being displayed by a worker(s).
- Develop protocols to respond to any confirmed cases of Covid-19 among project workers, including isolation or quarantine and return-to-work conditions.

Sexually Transmitted Infections (STIs):

The project activities will bring together many people in the community into interaction with workers from other communities. These interactions may develop into intimate relationships between workers. There shall be potential threat to exposure of community members to STIs such as HIV/AIDS, gonorrhoea, syphilis etc.

The project will ensure that every worker is inducted on the project GBV/PSEA/SH and the GRM. In addition, every worker shall sign the employee code of conduct as an affirmation that s/he abides by the workplace ethics and integrity.

7. WORKERS' GRIEVANCE REDRESS MECHANISM

The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before the intervention of a formal court, except in cases where the grievance constitutes a criminal offence that requires notifying law enforcement. Under the provisions of ESS2, the project will provide a grievance redress mechanism (GRM) for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

7.1 Government Employees

Chapters 14 and 15 of the South Sudan Civil Service Act (2011) outline the procedures for handling disciplinary matters, as well as administrative and legal grievances for Government staff.

1. The Ministry of public service is responsible for issuing a Code of Conduct (CoC) to provide for best practice that reflects the values of the Civil Service. The CoC applies to civil servants, officials and employees in all Ministries.
2. Every managing Ministry is responsible for ensuring that every civil servant, official and employee is familiar with the standards of the CoC and works in conformity to it.
3. Circumstances under which any civil servant, official or employee is deemed to have committed a breach of CoC and can therefore be subjected to investigation and possible discipline are stipulated.
4. Any civil servant, official or employee who is aggrieved by the findings or penalties imposed upon him/her by a summary or board of Discipline hearing may lodge his/her grievance with the South Sudan Civil Service Commission or the South Sudan Employees Justice Chamber in accordance with the relevant law.
5. A civil servant, official or employee has the right to lodge a grievance concerning alleged violation by public authorities of his/her rights, with their managing Ministry liable in the first instance.
6. Where the civil servant, official or employee is not satisfied with the outcome of a grievance hearing conducted under (5) above, of the cause of the grievance lies outside the managing Ministry, the civil servant, official or employee may lodge the grievance with the South Sudan Civil Service Commission or the South Sudan Employees Justice Chamber in accordance with the relevant law.
7. MAFS will consolidate these grievances, and those from UNOPS within the regular progress reports to the World Bank.

7.2 UNOPS Employees

The UNOPS workers' GRM procedure is defined as follows.

1. UNOPS personnel shall comply with the duties and responsibilities set out in the Charter of the United Nations, the United Nations Staff Regulations and Rules, the Standards of Conduct for the International Civil Service (as defined, from time to time, by the International Civil Service Commission) and with other relevant instruments in the UNOPS Legislative Framework.
2. Disciplinary or administrative actions shall be imposed on any UNOPS personnel failing to abide by the required standards of conduct. Managerial action may be imposed on personnel to correct departures from the expected standards of conduct not amounting to misconduct, or to complete managerial or administrative actions.
3. All UNOPS personnel have a duty to report suspected misconduct as follows:
 - a) Discrimination, harassment, sexual harassment or abuse of authority shall be reported to People and Change Group (PCG);

- b) Retaliation for reporting suspected wrongdoing or for co-operating with an investigation or audit or duly authorised fact-finding activity shall be reported to the Ethics Officer;
- c) All other suspected misconduct shall be reported to the Internal Audit and Investigation Group (IAIG).

Personnel may also report suspected misconduct to an immediate supervisor or to another appropriate supervisor within the business unit. The supervisor shall then immediately report the matter to IAIG, PCG or the Ethics Officer as above.

4. The Ethics Office can be approached directly by any UNOPS personnel, regardless of their contractual modality, for confidential advice and guidance on ethical issues and ethical dilemmas. The Ethics Office cannot be compelled by any United Nations official or body to disclose issues brought to its attention.

5. Personnel are also encouraged to seek confidential advice from the Office of the United Nations Ombudsman, regarding workplace-related concerns, and on how to resolve conflict through informal means, as appropriate.

7.3 IPs and Contractor Workers

Implementation partners and Contractors' workers GRM procedure is defined as follows.

1. MAFS and UNOPS shall contract only contractors with a registered code of conduct or who sign an undertaking to comply with the provisions of the Labour Act for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.
2. Contractors shall induct the employees on the applicable workers' grievance redress mechanism and make them aware of their rights. All records of induction shall be kept and made available for inspection by MAFS, UNOPS and/or the World Bank.
3. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
4. The supervisor will verify the details and seek to address the matter within the shortest time (up to 48 hours) and define if the complaint has regard with national law or with ESF standard.
5. The supervisor will escalate the matter if not resolved within 48 hours.
6. Where the formal courts are accessible and functional, when the complaint has regards with national law and when no resolution is found, the employee can escalate the matter to the sector specific institutions or courts who will resolve the matter between employer and employee.
7. UNOPS, through its Office of the Inspector General (OIG) inspection officer, might engage sanctions toward contractors for ? according to the **Vendor Sanction Policy**.
8. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgement, or if the complaint is based on the World Bank ESF standards but not the national law, the matter shall be reported to and handled through the **Project Grievance Redress Mechanism (GRM)**. **A fair agreement between the worker and the contractor will be facilitated by the Project support unit (PSU)**.
9. The contractor shall keep records of all proceedings of grievance redress that are within their jurisdiction and provide all details as part of the periodic progress reports to UNOPS.
10. In case of risk of retribution, the employee may immediately escalate to the court system or to the Project manager. If confidentiality is requested, the PSU will ensure it to avoid any risk of retribution, including in its follow-up actions.

7.4 Community workers/ Beneficiaries

Community workers shall apply to the Project GRM. All grievances of sexual nature (GBV/sexual harassment/Sexual Exploitation and Abuse) should follow the SNSOP GBV/SEA Action Plan referral pathways and complaints resolution mechanism. The community workers will be made aware of the issues that will be addressed by the project GRM and the GBV/SEA Action Plan referral pathways and complaints

resolution mechanism, where the latter should be handled/investigated by a trained and particular set of committees (GBV focal point).

The process for the Community Feedback and Complaint Mechanism involves five steps;

- Collecting feedback and complaints – this will be accessible through various channels including Project oversight structures such as the Appeals Committees at Boma level, help lines, and project suggestion boxes.
- Recording – all complaints will be recorded on a standard reporting template and registered in a database according to category i.e., programmatic or accountability.
- Referring – the complaints will then be referred to the appropriate oversight structure or agency/department for investigation and resolution.
- Responding - the complainant will receive an acknowledgement of their complaint having been received and registered by the responsible project oversight structure, along with timelines for when they can expect to receive a comprehensive response. The Appeals Committees shall meet on a weekly basis, as necessary, to review and resolve grievances registered in the week Feedback shall be provided to the complainant within no more than 14 days by the Appeals Committees. Where after review by the Appeals Committee it is established they are unable to resolve the complaint, it shall be forwarded or escalated to the appropriate structure above the Appeals Committee (i.e. the Payam/ Block Development Committee, Municipality Core Team, County Core Team or State Technical Committee). Once the complaint is resolved by the higher structure to which it was escalated, the Appeals Committee will be notified of the outcome..
- Closing and Appeal - Once a resolution has been agreed and accepted by the complainant, the complaint will be officially closed. In the event that the complainant is not satisfied with the redress provided, they will have the option of lodging an appeal with courts of laws..

7.5 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7.6 GBV-SEA / SH Grievances

All grievances of sexual nature (GBV/sexual harassment/Sexual Exploitation and Abuse) should follow the SNSOP SEA/SH Prevention and Response Action Plan referral pathways and complaints resolution mechanism.

Community workers and project beneficiaries may report GBV-related grievances through the GBV Focal points at the Boma level or through the existing Community Based Complaints Mechanism (CBCMs)

established by the PSEA (Protection against SEA) Task Force (comprised of UN agencies and NGOs), and all referrals will be directed to the UNFPA One-Stop Centres for GBV survivors. The exact locations of the Centres are captured in the ESMF. Not all of the target sites may not have a One Stop Centre or referral pathways by the time the project is launched.

In the locations where One Stop Centres are not available, the Accountability for Affected Populations (AAP) Officers/ HSSE Officers and/or other relevant project staff will ensure all types of services described above in connection with referral pathways are available for survivors, especially provision of Post Exposure Prophylaxis (PEP) kits as per the South Sudan Prevention of Sexual Exploitation and Abuse Standard Operating Procedure (PSEA SOP). The Project team will liaise with the GBV sub-cluster in the areas of the proposed project to ensure that the affected population is informed of the latest referral pathways. Further details on handling of SEA/ SH-related grievances can be found in the SEA/SH Prevention and Response Action Plan.

Beneficiaries may also use the available GBV helpline to report GBV -related grievances through which the appropriate referral pathway will be raised.

The reporting process of incidents (or grievance redress mechanism) regarding SEA related misconducts or prohibited practices involving UNOPS personnel shall be done through the UNOPS in-country Focal Point on the matter, the Head of Office, the Ethics Officer based at the Headquarters and the OIG. All UNOPS Personnel shall be made aware of this reporting mechanism and if any of the standards and policies are revised during the lifetime of the project, the latest versions will be respected.

7.7 Procurement Protest

All procurement related issues would be handled as per the procedures defined in the MAFS and UNOPS procurement policies and procedures. Fairness and transparency are fundamental principles for UNOPS procurement activities. Bidders who believe they were not treated fairly in connection with a UNOPS procurement action may present a protest. In order to present a protest, Bidders should submit the following information:

- The Name, address, telephone number, fax number, and email of the bidder;
- The Solicitation, Purchase Order or Contract Number, name of the Buyer and the office issuing the Solicitation, Purchase Order or Contract;
- A brief statement on the grounds of the protest, an explanation of how the protest is timely, and an explanation of how the Bidder was directly affected;
- Copies of relevant documents supporting the statement;
- A brief statement on the best way for UNOPS to provide the bidder with relief.

Bidders will normally receive a reply within 10 working days.

7.8. Timeframe for Processing Grievances and Feedback.

Type of Case	Actions Required	Response Required	No. of days for action
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GBV/SEA/SH	Report within 24hrs for severe cases, 48 to 72 hrs for indicative cases.	Identify referral agencies to manage survivors cases	1 to 3 days
Straight-forward cases with little anticipated complications e.g (holding long meetings exceeding agreed times)	Minimal checks and consultations	Acknowledge receipt of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if needs be, and communicate outcomes and next steps based on outcomes	1-2 days
Cases that require some minimal processes e.g. (delayed payment of a contractor)	Clarify existing information, and correct misleading information	Acknowledge receipt of the grievance, detail the steps to follow, and provide the appropriate practical timelines	1 - 5 days
Cases that require investigation (land ownership dispute)	Access and review of relevant documentation (Land donation form, Lease document), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches	Acknowledge receipt of the grievance, provide follow-up steps and outline steps that will be followed to provide a comprehensive response	1 month
Cases related to property damages	Clarify the type and nature of property damage	Acknowledge receipt of the grievance and provide as guide for assessment of the level of damages and appropriate redress	2 - 3 months
Cases that require escalation to higher implementation level e.g. (Fraud)	Transfer the case to a relevant higher level (state-level or national HQ of MAFS, IP or WB)	Acknowledge receipt of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response	1 - 2 months
Cases that the complainant want escalated to statutory bodies	The complainant may escalate a case to relevant institution (National Police Service, Court or the WB)	Acknowledge receipt of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress	1-6 months

Institutional Arrangement for GRM

MAFS is the lead body for the implementation of the GRM in collaboration with IPs. The safeguards unit within the MAFS and IPs will be responsible for the GRM related day-to-day tasks. And the Social Development Specialist is the Focal Person responsible for GRM at the MAFS and IPs.

At the county level the main responsibility for GRM related activities sits with the County Core Team (CCT). There are CCTs for each county who will be assisted by Appeal Committees selected by the community and assigned to each sub-project. In addition to the Appeal committees, group leaders and community supervisory committees will also help with GRM data collection. The designated IP Field Staff will support

the Help Desk in selected places in the project area where community GRM Appeal Committees were selected.

Each IP is responsible for awareness creation on the GRM at the county in which they will be operating; roll-out information dissemination; prepare and manage help desks at project sites; run a suggestion box at the project site (nearest office of administration); receive and handle grievances.

The members of the Appeal Committee must be respectable and should have a positive influence in the project. 50% of the committee will be women to ensure women are comfortable to raise their complaints. The Appeals Committee members shall be helped with project resources to facilitate their activities e.g. transport reimbursements, incentives.

A GBV focal person shall be appointed for each Appeals Committee and will be responsible for handling all GBV and SEA/SH incidents involving project affected persons or linked to the project.

The GRM system recognizes the existence of the traditional grievance handling mechanisms. The presence and inclusion of the traditional or customary GRM system in the project site shall be identified and strengthened for the benefit of the project GRM system. The traditional leadership will be used to settle issues like communal land conflicts in order to benefit the project GRM system as well as to ensure the sustainability of the GRM.

8. MONITORING AND SUPERVISION

In order to ensure the implementation of the LMP by stakeholders, and contractors in particular, the following indicators will be monitored by MAFS and UNOPS on a regular basis:

- Number of workers
- Number of workers with valid contracts
- Number of trainings provided to workers on OHS, GBV and sexual harassment
- The existence of an OHS committee
- The presence of OHS personnel
- Number of workers provided with PPE
- The presence of sanitary facilities: toilets (separate for men and women), hand washing facilities, waste collection points
- Worker fatalities and loss-time incidents
- Project worker (including contractors) project-related traffic accidents or significant traffic violations
- The existence of a worker's GRM
- Workers' grievance logbooks
- Number of complaints received
- Number of complaints resolved within the timeframe of the GRM

A detailed checklist that will be used during monitoring is in appendices. Quarterly reports will be prepared and shared with the PCU for approval before submission to the World Bank. Incident reports will be prepared as well if circumstances require it. More details on reporting requirements are provided in the Environmental and Social Commitment Plan (ESCP).

The performance monitoring of this LMP will be an integral part of the monitoring and supervision of the ESMF system and will follow the same institutional arrangements. Its detailed mechanisms are laid out in the monitoring section of the ESMF. In general, UNOPS in consultation with the PCU will be responsible

for the monitoring of the implementation of the LMP. In particular, the lead Environmental and Social Risk Management Officers in UNOPS will work directly with the relevant officers in the field to ensure that the LMP is fully implemented.

The E&S Risk Management Officers will undertake supervision missions and spot checks. Through the initial activity- or site-specific screening process, the Social Risk Management Officers will be aware of potential labour-related risks and impacts of activities and will develop a monitoring schedule around these. Non-compliance of the LMP will be reported to the Environment /Social Specialist in the PCU, and will be taken up in the regular E&S reporting (see Appendix on reporting outline). Furthermore, the Project will deploy a third-party monitor, who will also be tasked to monitor the implementation of the ESMF and associated instruments, such as the LMP.

8.1 Estimated Budget

Activity	Cost Estimate (USD)
Sensitization of all workers on their rights and obligations as per the LMP (code of conduct, GBV-SEA prevention, workers' and project GRM etc.)	10,000
Training of trainers to be cascaded to all workers on health and safety at work (safe use of equipment and lifting techniques, correct use of PPE, HIV awareness, COVID-19, etc.) GBV and SEA	10,000
Sensitization and training on implementation of relevant project safeguards for Direct workers, contracted workers and contractors / implementing partners and community workers	20,000
Implementation of workers' grievance and redress mechanism	20,000
Total	60,000

APPENDICES

Appendix 1: Guideline on Code of Conduct

1. A satisfactory code of conduct will contain obligations on all project workers (including sub-contractors) 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 to specific project requirements.

2. The Code of Conduct should be written in plain 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 can result in serious consequences, up to and including dismissal, or referral to legal authorities.

3. 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 or non-compliance.

4. The issues to be addressed include:
 - 2) Compliance with applicable **laws, rules, and regulations** of the jurisdiction
 - 3) 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)
 - 4) The use of **illegal substances**
 - 5) **Non-Discrimination** (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction)
 - 6) **Interactions with community members** (for example to convey an attitude of respect and non-discrimination)
 - 7) **Sexual harassment** (for example to prohibit use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
 - 8) **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)
 - 9) **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)
 - 10) **Sanitation** requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
 - 11) 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)
 - 12) **Respecting reasonable work instructions** (including regarding environmental and social norms)
 - 13) **Protection and proper use of property** (for example, to prohibit theft, carelessness or waste)
 - 14) Duty to **report violations of this Code**
 - 15) **No retaliation against workers** who report violations of the Code, if that report is made in good faith.

Appendix 2: Sample Individual Code of Conduct in Case of Small Works Contractor

Implementing Environmental, Social Health and Safety (ESHS) and Occupational Health and Safety (OHS) Standards

Preventing Gender Based Violence (GBV) and Violence against Children (VAC)

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable, be it on the work site, the work site surroundings, at worker's camps, or the surrounding communities. The company considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate. No children under 18 would be considered as project workers. Nevertheless, precaution toward children under 18 in contact with project workers are presented below.

I agree that while working on the project I will:

- Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
- Shall wear my personal protective equipment (PPE), in the correct prescribed manner, at all times when at the work site or engaged in project related activities.
- Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
- Implement the OHS Management Plan.
- Adhere to a zero-alcohol policy during work activities, and refrain from the use of illegal substances at all times.
- Consent to a police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.

- Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour. Ex. Looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.
- Not engage in sexual favours—for instance, making promises or favourable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
- Unless there is the full consent¹ by all parties involved, I shall not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the GRM (Grievance Redress Mechanism) or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my employer or not, or any breaches of this Code of Conduct.
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With regard to children under the age of 18 in contact with project workers:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also "Use of children's images for work related purposes" below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labour, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including labour laws in relation to child labour.

Use of children's images for work related purposes when photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film shall be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically

I understand that my employer will:

Conditions of work

- Set up a complaints management system for workers
- Prohibit discrimination and promote equal opportunities
- Prohibit the recruitment of minors (under 18)
- Prohibit the recruitment of illegal labour
- Prohibit and sanction the exploitation of agricultural labour
- Prohibit and punish practices of sexual harassment or sexual abuse and exploitation in the workplace
- As far as possible, local recruitment will be favoured by prioritising workstations to people residing within the scope of implementation of the sub-project
- Put in place sanitary measures to prevent the spread of COVID-19, and other communicable diseases, including through provision on PPE
- Provide adequate training and safety measures to prevent potential incidents and accidents including those caused by fire and project vehicles.
- Implement occupational health and safety measures as identified in the Environmental and Social Management Plan (ESMP) or the Study of Environmental and Social Impact Assessment (ESIA) that will be prepared for the subproject. These measures will be consistent with goods international practice of health and safety at work, including the World Bank.

Sanctions: I understand that if I breach this Individual Code of Conduct, my employer shall take disciplinary action, which could include:

- Informal warning.

- Formal warning.
- Additional Training.
- Loss of up to one week's salary.
- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- Termination of employment.
- Report to the police if wanted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I shall adhere to the occupational health and safety management plan. That I shall avoid actions or behaviours that could be construed as GBV or VAC. Any such actions shall be a breach of this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Appendix 3: Matrix for some potential risks associated with health and safety issues in the project, the equipment and budget that will be needed to be costed in the contractor's contract as necessary

Potential OHS impacts	Mitigation measures
PLANNING AND PRE-CONSTRUCTION PHASE (including site preparation)	
General waste that may exist before or generated during the site installation	Develop waste management plan for various specific waste streams Prohibit burning of waste Maintain all construction sites in a cleaner, tidy and safe condition Provide and maintain appropriate facilities as temporary storage of all wastes before transportation and final disposal.
Dust emissions or and health hazard during the excavation works, dismantling works or site clearance	Notify the workers before starting the demolishing work or excavation works, Water spraying on the bear surface or dust pollution source Proper health and safety measures for the workers such as using of appropriate PPE (helmet, Earplug, musk, safety shoes, hand gloves etc.) should be taken to avoid any accidents;
-Removal of vegetation or tree cutting in the project sites may expose workers to accident risk; noise level increase and vibration effects -Removal of utilities such as electrical cables may expose workers to injury or killing by electric shock (electrocution) -Exposure to or faulty electrical devices, such as circuit breakers	Workers should be sensitised about the nature of the works and precautionary measures to be taken Construct noise barrier around the dismantling site; stop the engine when it is not required; monitor noise level as per existing guidelines Prevent accidents and injury to health by minimising hazards in the working environment Contractor will cut only trees if have been agreed With the district local authorities and the environmental Officer -A vegetation restoration plan will be implemented
Eye hazards due to solid particles from a wide variety of preliminary construction operations	Use of machine guards or splash shields and/or face and eye protection devices, such as safety glasses with side shields, goggles, and/or a full face shield
CONSTRUCTION PHASE	
Air quality can be affected by vehicle exhaust emissions and combustion of fuels or by emissions from construction machineries, causing air pollution, respiratory and other diseases -Dust generation from earth excavation, earth & sand stockpiles during dry period -Work-related accidents	Fit vehicles with appropriate exhaust systems and emission control devices; Maintain vehicles and construction equipment in good working condition including regular servicing Operate the vehicles in a fuel-efficient manner; Impose speed limits at 30 km/hour on vehicle movement at the worksite to reduce dust emissions; Water spraying on the bear surface or dust pollution source Proper health and safety measures for the workers such as using of appropriate PPE (helmet, musk, safety shoes, hand gloves etc.) should be taken to avoid any accidents Focus special attention on containing the emissions from generators;

Potential OHS impacts	Mitigation measures
	<p>Construction equipment causing excess pollution (e.g. visible smoke) will be banned from construction sites immediately prior to usage;</p> <p>Water spray to the dry earth/ material stockpiles, increase the watering frequency during periods of high risk (e.g. high winds);</p> <p>Stored materials such as: excavated earth, dredged soil, gravel and sand shall be covered and confined to avoid their wind drifted;</p> <p>The Air quality monitoring should be carried out by the contractor following the National Air Quality Standard</p>
<p>OHS construction work risks such as:</p> <ul style="list-style-type: none"> - Slips, trips, falls - Hands and vibrations - Falling objects - Trench work - Scaffolding - Electrical work - Elevated surfaces - Vehicle movement - Hazardous materials - Material handling - Noise - Working under exhaustion or heat conditions - Worker transportation (to and from work sites) 	<p>Identification of potential hazards to workers, particularly Those that may be life-threatening</p> <p>Provision of preventive and protective measures, including Modification, substitution, or elimination of hazardous conditions or substances</p> <p>Training of workers on appropriate OHS practices</p> <p>Documentation and reporting of occupational accidents, diseases, and incidents</p> <p>Emergency prevention, preparedness, and response arrangements</p> <p>Requirements to follow good industry practice and EHS Guidelines will be included in bidding documents of all civil works contractors.</p>
<p>-Vibration and noise quality will be deteriorated due to vehicular traffic, blasting and construction equipment</p>	<p>Strict measures for noise pollution control need to be undertaken during construction activities;</p> <p>Create noise barrier and consider the minimum noise levels at sensitive receptor sites</p> <p>Stone breaking machine should be confined within a temporary shed so that noise pollution could be kept minimum</p> <p>Protection devices (ear plugs or ear muffs) and masks shall be provided to the workers operating in the vicinity of high noise generating machines during construction;</p> <p>Construction equipment and vehicles shall be fitted with silencers and maintained properly;</p> <p>Instruction to the drivers to avoid unnecessary honking;</p> <p>The Noise level monitoring should be carried out by the contractor following the national noise quality standards</p> <p>Board Vibration monitoring should be carried out by the contractor.</p>
<p>- Lack of proper infrastructure facilities, such as water supply and sanitation facilities may expose workers to hygiene-related diseases or lack of potable water</p>	<p>Train all construction workers in basic sanitation and health care issues and safety matters and on the specific hazards of their work</p> <p>The contractor will provide movable toilets for both men and women</p>

Potential OHS impacts	Mitigation measures
<p>-Accidental spillage of hazardous liquid from the construction camps</p>	<p>The contractor will provide drinking water meeting the national standards pH and coliforms contents should meet standards for drinking water) The water quality monitoring should be carried out by the contractor following the national water quality standards Regular health check-up of the workers Handling and storage of the potential contaminants has to be organized under strict condition to avoid water pollution during construction Handling of hazardous liquid should be done carefully by the designated experienced person</p>
<p>-Inappropriate handling or accidental spillage/leakage of these substances can potentially lead to safety and health hazards for the construction workers</p>	<p>Workers to be mindful of the occupational exposures that Could arise from working environment Workers on construction sites should receive special health and safety training specific to remediation activities Handling and storage of the potential contaminants has to be organised under strict condition to avoid water pollution during construction Handling of hazardous liquid should be done carefully by the designated experienced person The ground water quality monitoring should be carried out by the contractor following the National Water Quality Standard</p>
<p>Fires and or explosions resulting from ignition of flammable materials or gases can lead to injury or fatalities to project workers</p>	<p>Storing flammables away from ignition sources and oxidising materials. Be equipped with fire extinguishing devices and self-closing doors, and constructed of materials made to withstand flame impingement for a moderate period of time</p>
<p>Road Traffic and Accidents</p>	<p>Proper Traffic Management Plan (TMP) should be prepared by The contractor during starting of construction and follow it strictly; In this TMP, the road safety measures such as speed breakers, Warning signs/lights, road safety signs, flagman etc. should be prepared and implemented</p>
<p>Solid wastes and hazardous wastes</p>	<p>Hazard communication and training programs to prepare Workers to recognize and respond to workplace chemical hazards Waste management and pollution control plan Minimize the production of waste materials by 3R (Reduce, Recycle and Reuse) approach Prohibit burning of solid waste Ensure proper collection and disposal of solid wastes within the construction camps; Insist waste separation by source; organic wastes in one container and inorganic wastes in another container at sources; Dispose organic wastes in a designated safe place on daily basis;</p>

Potential OHS impacts	Mitigation measures
	<p>The organic wastes should be always covered with a thin layer of sand so that flies, mosquitoes, dogs, cats, rats, etc. are not attracted</p>
<p>GBV (sexual harassment of women and girls, exploitative sexual relations, sex work, etc.)</p>	<p>ESMP should identify risks of labour influx and propose general mitigation measures</p> <p>Develop and implement a national level GBV Action Plan with an accountability and Response Framework</p> <p>Training and awareness on unacceptable conduct toward female workers</p> <p>Informing workers about national labour law that makes sexual harassment and gender-based violence a punishable offence which is prosecuted</p> <p>Introduce a worker code of conduct as part of the employment contract including sanctions</p> <p>Contractors to adopt a policy to cooperate with law enforcement agencies in investigating complaints about GBV</p> <p>Ensure that women are given equal employment opportunities during recruitment and job postings.</p>
<p>-Increased risk of work crews spreading sexually transmitted infections and HIV/AIDS.</p> <p>-Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the workers.</p>	<p>Provide HIV-awareness programming, including STI (sexually transmitted infections) and HIV information, education and communication for all workers on regular basis;</p> <p>Train workers on health and safety, on communicable diseases;</p> <p>Regular health check-up of the workers and awareness training About the communicable diseases</p> <p>Educating project personnel, and area residents on risks, prevention, and available treatment for vector-borne diseases</p> <p>Provide the workers a safe and healthy work environment;</p> <p>Provide health care facilities and first aid facilities</p> <p>Readily available,</p>
<p>Exploitation of workers</p>	<p>Ensure that all workers have contracts with terms and conditions that are consistent with national labour laws and policies as well as ESS2</p> <p>Every worker should be trained on as well as sign a Code of Conduct</p>
<p>Child and forced labour</p>	<p>Ensure no children are employed on site in accordance with national labour laws and ESS2</p> <p>All workers should be able to demonstrate their age by use of national identity cards or other official documentation</p> <p>Inform communities and stakeholders that the use of child labour/ students (including for community contributions) is not permitted on the project</p> <p>All workers must have an employment contract, be paid for their work and have the right to resign if they wish</p>
<p>Pollution of water</p>	<p>No garbage or refuse, waste oils should be discharged into drains or onto site grounds</p>

Potential OHS impacts	Mitigation measures
	<ul style="list-style-type: none"> - Fuel storage tanks or sites should be properly secured to contain any spillage - Toilet facilities should be provided for construction workers to avoid indiscriminate defecation in nearby bush or local water bodies
Sanitary wastewater discharges	Adequate portable sanitation facilities serving all workers should be provided at all construction sites. Sanitary wastewater in construction sites should be properly managed
Hazardous waste: paint, fuel, chemicals, oil, petroleum products, bitumen etc. may harm the health of construction workers	<ul style="list-style-type: none"> - Appropriate mitigation and protective measures are to be included in the ESMP - Train the relevant construction personnel in handling of fuels and spill control procedures - Training workers on the correct transfer and handling of fuels and chemicals and the response to spills

Appendix 4: Health and Safety Incidents Tracker
Safety incident tracker

Class of incidents

Class 1	Class 2	Class 3
Minor: no one was injured or contaminated	Moderate consequences: minor injury with short term impairment	Major/critical: life at stake, severe injuries with long term or permanent

Reference number	Class of incident	Brief description	Cause of the incident	Date	Action to be taken	Due date	Responsible	Progress	Status
INC001									Open
INC002									Closed

Appendix 5: Employment, Health and Safety Conditions Monitoring Form (Checklist)

Contractor's name: Site name..... Date:

Instructions; Tick (✓) if available, put a cross (X) if unavailable.

Tick (✓) if there's evidence, put a cross (X) if there's no evidence.

NO	Monthly Checklist: EHS items	Available	Unavailable	Type of evidence	Comment
1	Current Employee List				
2	Valid Working Contract				
3	Appointment letters				
4	Inductions – all contractor staff				
5	Routine OHS talk – all staff				
5	Reporting: Incidents accidents tracker/register.				
6	Grievance redress mechanism				
7	Health and Safety Committee				
	Sanitary facilities: toilets (separate for men and women), hand washing facilities, waste collection points.				
9	PPE (boots, gloves, helmets, masks, and additional equipment as required for specific tasks): branded & properly worn at all times.				
10	Awareness on SGBV and STDs				
11	Valid First Aid Kit				
12	Valid Fire extinguishers				
13	The incident register				

