

THE REPUBLIC OF UGANDA
MINISTRY OF GENDER, LABOUR AND SOCIAL DEVELOPMENT (MGLSD)

GENERATING GROWTH OPPORTUNITIES AND PRODUCTIVITY FOR WOMEN ENTERPRISES IN (GROW) UGANDA - P176747

LABOUR MANAGEMENT PLAN (LMP)

NOVEMBER 2023

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LIST OF ACRONYMS

AIDS	Acquired Immune Deficiency Virus
AP	Aggrieved Person
CAE	Child Abuse and exploitation
CBO	Community Based Organisation
CoC	Code of Conduct
COFTU	Central Organization of Free Trade Unions
DCDO	District Community Development Officer
DLD	District Labour Officer
DSA	Daily Subsistence Allowance
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRS	Environmental and Social Review Summary
ESS	Environmental and Socials Standard
FBO	Faith Based Organisation
GBV	Gender Based Violence
GoU	Government of Uganda
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GROW	Generating Growth Opportunities and Productivity for Women Enterprises
GRS	Grievance Redress Service
HIV	Human Immunodeficiency Virus
HSE	Health Safety and Environment
IFC	International Finance Corporation
ILO	International Labour Organization
IPC	Infection Prevention and Control
LMP	Labour Management Plan
M&E	Monitoring and Evaluation
MGLSD	Ministry of Gender, Labour and Social Development
MLG	Ministry of Local Government
MoFPED	Ministry of Finance, Planning and Economic Development
MoLHUD	Ministry of Lands, Housing and Urban Development
MoH	Ministry of Health
NEMA	National Environment Management Authority
NGO	Non-Governmental Organisation

NOTU	National Organization of Trade Unions
NSSF	National Social Security Fund
OHS	Occupational Health and Safety
OSH	Occupational Safety and Health
OPM	Office of the Prime Minister
PAP	Project Affected Persons
PDO	Project Development Objective
PIT	Project Implementation Team
PIM	Project Implementation Manual
POM	Project Operation Manual
PPE	Personal Protective Equipment
PSFU	Private Sector Foundation Uganda
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SDS	Social Development Specialist
SOPs	Standard Operating Procedures
VMGF	Vulnerable and Marginalized Group's Framework
WB	World Bank

1. INTRODUCTION

1.1. Background to GROW Project

The Government of Uganda, through the Ministry of Gender, Labour and Social Development (MGLSD) hopes to deliver the proposed Generating Growth Opportunities and Productivity for Women Enterprises (GROW) Project which will support the country's efforts to provide increased access to finance for women's enterprises; build business and digital skills; enhance women's social networking, provide opportunities for relevant exposure and mentorship. Furthermore, the project will address social norms and negative cultural practices that constrain women's economic empowerment.

1.1.1 Project Development objective

The Project Development Objective (PDO) is to increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises in targeted locations, including in host and refugee districts.

This will support interventions that address the constraints to women's economic empowerment with particular focus on women entrepreneurship, thereby enhancing women's income, productivity and both the economic and social support systems that enable their success as entrepreneurs and leaders in their communities. In addition, the project will support the Government of Uganda's gender-inclusive recovery from COVID19 and the gender targets under the Uganda Green Growth Development Strategy (UGGDS) (2017/18 – 2030/31).

1.1.2 Project Components

The GROW Project has four components. Component 1 will provide enterprise development services for women through training (technical, life-skills, digital), business advisory services, and enhanced networks for women through platforms that facilitate market linkages and value chain development. In addition, this component will seek to change negative social norms through sessions on preventing and responding to GBV, engaging with men and community leaders, and the like. Component 2 will support creation of revolving funds that provide credit to women entrepreneurs. Component 3 will support investments in enabling infrastructure and facilities including common-user facilities and child-care centers to ensure that women have access to economic and social infrastructure. Component 4 will support project management, policy innovations aimed at facilitating WEE, and evidence generation.

1.1.3 Project activities:

The various GROW project components will involve a number of activities that could pose labour risks, which may vary in nature and magnitude, but all of which affect various categories of workers under the GROW project. The different activities the project workers will carry out under each GROW project component include:

1. physical and virtual mobilisation of project beneficiaries into platforms,

2. training of project beneficiaries in trade specific skills,

3. engagement of women entrepreneurs under the work-placement program,

4. construction of multipurpose facilities and workplace infrastructure,5. equipping and operating of the public facilities

6. project management and monitoring activities

1.2. Rationale for the Labour Management Plan (LMP)

The Labour Management Plan (LMP) has been developed to manage labour risks during the implementation of the GROW project. The LMP is in line with national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2: Labour and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4). The Environmental and Social Management Framework (ESMF) identified potential environmental and social risks and impacts associated with Project implementation including those related to workers as well as community health and safety.

The Environmental and Social Risk Classification for GROW Project is "Substantial" due to the current low capacity of the MGLSD to manage environmental and social risk and the wide range of possible sub projects. An Environmental and Social Management Framework (ESMF) was developed alongside a Resettlement Policy Framework (RPF), Stakeholder Engagement Plan (SEP), and the Vulnerable and Marginalized Group's Framework (VMGF) as a set of due-diligence instruments to address and manage the environmental and social risks and impacts associated with the GROW Project. In the Environmental and Social Review Summary (ESRS) and the Environmental and Social Commitment Plan (ESCP) for the GROW Project, it was indicated that Labour Management Procedures would be developed and included in the ESMF and this was done. However, it was later realised that a full Labour Management Plan (LMP) had to be prepared besides the Labour Management Procedures. This Labour Management Plan (LMP) has been developed as a stand-alone but as part of plans that will be used with the ESMF to manage labour risks on the GROW project.

The World Bank has rated the risks and impact associated with workers as well as community health and safety, and the risk associated with labour impact as moderate due to the nature of minimal construction activities which are well understood and expected to have limited impacts as they can largely be avoided, minimized or managed through procedures, including procedures set out in this LMP. The LMP is a living document to facilitate project planning, preparation, and implementation. The LMP will be reviewed continually during project implementation and adequate measures and procedures to manage negative impacts will be put in place.

1.2.1 Linkage of the LMP with other Plans

The Labour Management Plan has linkages with the following Plans most of which have been included in the ESMF:

1. **Health, Safety and Environmental (HSE) Plan**: which takes care of the safety and health of the workforce while on the project. The HSE Plan guides on the structure and content for preparing a Health, Safety and Environment Management Plan (HSE-MP) which are to be sub-project specific for all sub projects implemented under the GROW Project.
2. **Waste Management Plan:** This plan was prepared to address waste management issues associated with subprojects under the GROW Project in line with legal and regulatory requirements.
3. **Emergency Preparedness Plan / Procedures** address issues of emergencies in the operations of the GROW Project-related infrastructure and sub projects including in labour management.
4. **Chance Finds Procedures for Physical Cultural Resources.** Provides guidance on how chance finds are to be handled once encountered while undertaking activities under GROW project
5. **The Stakeholder Engagement Plan (SEP) including the Grievance Redress Mechanism:** Provides procedures for managing grievances on subprojects under the GROW project.
6. **Incident reporting procedures;** guide on how incidents that occur under the GROW project activities are to be registered and reported

1.3. Purpose and Objectives of the Labour Management Plan

This Labour Management Plan (LMP) has been prepared to ensure compliance of the GROW project with the minimum Government of Uganda and International Labour Standards as well as the World Bank standard on Labour and Working Conditions (ESS2). Among the key principals to be upheld and objectives for which this LMP is prepared include:

1. Freedom of association and collective bargaining; Working conditions to comply with collective bargains or, where these are not in place, national law minimums on matters such as pay, hours, etc.;
2. Non-discrimination and equality of opportunity; To promote the fair treatment and non-discrimination of workers.
3. Freedom from child labour; To prevent the use of all forms of child labour.
4. Freedom from forced labour; To prevent the use of all forms of forced labour.

5. Retrenchment the core requirement of which is to have a retrenchment plan based on consultation and non-discrimination;
6. Working relations which should include documentation and communication of conditions;
7. Basic provisions to ensure occupational safety and health at work; To promote safety and health at work.
8. Grievance mechanisms whereby an appropriate procedure must be in place for workers; To provide project workers with accessible means to raise workplace concerns.
9. Human resource policy whereby the Contractor is expected to have a human resource policy in place; To protect project workers including vulnerable workers such as women and girls, persons with disabilities, children of working age, migrant workers and others.

1.4. Scope of the LMP

This LMP describes the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labour and working conditions. The LMP applies to all Project staff and workers whether full-time, part-time, temporary, seasonal or migrant workers. It also covers the contractors' and sub-contractors' workers on the GROW sub projects. The LMP as per ESS2 is applicable to (i) People employed or engaged directly by MGLSD and PSFU to work specifically in relation to the Project, (ii) People employed or engaged by contractors and sub-contractors to perform work related to core function of the project, regardless of location, and (iii) People employed or engaged by the primary suppliers for the GROW project as well as the community workers to promote the fair treatment, non-discrimination, and equal opportunity of project workers

The circumstances of the GROW project may not allow for engagement of community workers since the project components in their implementation require specific skills or levels of professionalism. However, given that the project intends to reduce influx of labour , as far as practically possible, the contractors will be encouraged to engage locally available labour before bringing in workers from outside the locality of the respective sub projects. Based on feedback received during stakeholder consultation, the communities are eager to be engaged in any available employment opportunities during the implementation of the GROW Project. Therefore, as far as possible, contractors will be sourced locally and encouraged to engage local workers during implementation of components such as component 3 on development of enabling infrastructure and facilities for women enterprise growth and transition.

2. OVERVIEW OF LABOUR USE ON THE PROJECT

The project will involve direct workers, contracted workers primary supply workers, and government civil servants. To the extent possible the contractors will be sourced locally and encouraged to engage locally available labour before bringing in workers from outside the locality of the respective sub projects to prevent labour influx.

The Labour Management Plan (LMP) applies to project workers including full-time, part-time, temporary, migrant workers[1] etc. The LMP is applicable, per ESS2 to the project in the following manner:

1. people employed or engaged directly by the Contractor (including the project proponent and the project implementing agencies) to work specifically in relation to the project *(direct workers);*
2. people employed or engaged through third parties to perform work related to core of the project, regardless of location (contracted workers).
3. Persons employed or engaged by the project's primary suppliers[2].

2.1. Project approach to Labour and Working Conditions Management

The GROW Project and subprojects will involve the mobilization and recruitment of a large number of employees during a limited period of time. Assuring good labour and working conditions for all persons who will be engaged during the implementation of the project is of high priority for MGLSD and the WBG. The majority of employees will belong to the contractor(s) or their sub-contractors. Still, MGLSD principles related to labour and working conditions will have to be implemented by all parties engaged in implementation of the project.

The LMP is an instrument to guide the Contractor(s), regarding their compliance with bidding documentations, in order to:

1. respect labour rights and working conditions for all their employees and the employees of their sub-contractors;
2. respect social and environmental conditions on all GROW project sites;
3. promote good working conditions and rules for health, safety and security;
4. promote workers' positive behaviour at project sites and within the affected communities; and
5. reduce negative impact of the Project.

In particular, the provisions of this LMP shall meet national legislation and international good practice in relation, but not restricted, to the following:

[1] A "migrant worker" is a person who either migrates within their home country or outside it to pursue work.

[2]See ESS2, footnote 5 of paragraph 2 (c). Primary suppliers "are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project."

1. Provision of all rights for all workers as envisaged in the national legislation;
2. All workers belonging to contractors and/or sub-contractors (and all other third parties) should be legally registered;
3. Development of a worker registration system that enables the PITs and Contractor to keep track of all workers on each site and to identify the person (organization) for whom they are directly working;
4. Each contractor/sub-contractor should develop a register for all their workers. This register should contain data such as: name, age, sex, gender, date of engagement, hours worked, wages, payments (including overtime payments) made and any deductions made from their wages. The register should be in line with national requirements on registration of workers;
5. Establishing a coherent and integrated grievance mechanism for all workers engaged on the GROW project, its contractors and their sub-contractors.

2.2. Details of the Labour force on the GROW Project

Number of Project Workers:

The total number of workers to be employed on the project is not known, except for the Project Implementation Teams (PIT). There will be different types of workers: (i) direct workers include the PIT staff which are hired under contract to the project for the duration of the project implementation. There will be two implementation teams, one for the MGLSD and PSFU to be financed under the project; (ii) contracted workers including firms or companies that will be contracted to manage the grants (iii) short-term consultants who will be contracted to undertake several kinds of short period assignments; (iv) contractors and workers on construction sites. There will be no voluntary workers under the GROW project. Contractors and subproject proponents will however be expected and encouraged to hire workers from the community on terms consistent with ESS2 and National policies and laws, before they consider migrant workers. These may be required for skilled and semi-skilled works where needed under the GROW Project.

Characteristics of Project Workers:

i. GROW project activities will be handled by qualified professional staff and Consultants hired under the project implementation units at MGLSD and PSFU
ii. Construction and/or rehabilitation works required at project sites will be undertaken by Contractors and subcontractors, who will be selected on the basis of their competence.
iii. Migrant and Semi-skilled labour – ancillary staff with relevant vocational training or skills e.g., drivers, equipment monitoring/maintenance technicians, machine operators, masons, carpenters, etc.

Timing of Labour Requirements: The timing and sequencing of labour requirements varies in terms of numbers, locations, types of jobs and skills required. The timing of labour requirements will correspond to timing of implementation of activities under the different project components.

Direct Project workers are eligible to work on fulltime fixed renewable contracts for the duration of the entire project implementation. The duration of contracts will vary by assignment.

Types of workers

ESS2 categorizes the workers into direct workers, contracted workers, primary supply workers as well as community workers. The categories for which the GROW project workers have been defined are provided below.

i. **Direct Project Workers:** Direct project workers will be eligible to work full-time for the duration of project implementation. This shall include the staff of the project implementation teams at both MGLSD and PSFU.

ii. **Contracted Workers**: This category will include all workers deployed as technical consultants (full and part-time) by the PIT under the project. The trainings on business development services, trade specific skills, business plan competitions and those involved in construction of facilities will all be executed through a third-party firm with the capacity to deliver to all project implementation districts. These contracts will be advertised and will seek firms with specific technical expertise. Contracted Workers will also be engaged for the construction of facilities under component 3. The terms and conditions of these contracts will adhere to the national labour legislations and regulations and be guided by the Project Implementation Manual (PIM).

   The Short-Term consultants and contracted workers will be engaged by the Project to undertake several kinds of short period assignments including providing specific technical expertise or to undertake specialized assignments such as training women entrepreneurs in business development services, trade specific skills, development of the management information system. To prevent labour influx and its associated risks, GROW project contractors and sub-contractors will, to the extent possible, hire workers from the local community.

iii. **Primary Supply workers:** During project implementation, the project may employ or engage primary suppliers in procurement of a substantial amount of certain materials, goods or services for its core function. Primary suppliers supporting project activities will be required to adhere to the procedures established in the ESS2, particularly with respect to monitoring and mitigating the risk of child labour or forced labour, and the requirement to implement OHS procedures laid out in the LMP in order to mitigate risks of safety issues related to primary supply workers

iv. **Community Workers:** Community workers may be engaged for specific activities under the project, however these activities are yet to be clearly defined. In instances where community workers are to be engaged on the project, the provisions of ESS2 will apply to Community Workers, including but not limited to working conditions, occupational health and safety, requirements and procedures related to child labour or forced labour, and the Grievance Redress Mechanism.

3. NATIONAL LABOUR LEGISLATION, ESS AND BEST PRACTICE REQUIREMENTS

3.1. Policy Framework

The following Policy Framework apply to this Plan:

1. **The National Environment Management Policy, 1994:** The overall policy goal is sustainable development, which maintains and promotes environmental quality and resource productivity for socio-economic transformation;
2. **Uganda Vision 2040:** The goal is to foster socio-economic transformation from a subsistence-based economy to an industrialized one;
3. **The National Environment Health Policy 2010:** This policy establishes the environmental health priorities of the Government of Uganda and provides a framework for the development of services and programmes at national and local government levels;
4. **National Policy on Elimination of Gender Based violence, 2016:** The policy emphasizes early intervention to prevent re-victimization of and long-term effects for girls, including interpersonal violence, sexual coercion, alcohol and drug abuse and mental health problems; Reporting cases of violence against children immediately;
5. **National Policy on HIV/AIDS and the world of work, 2007:** The policy obliges developing entities to mainstream HIV/AIDS interventions to their planned development interventions;
6. **The National Policy for Older Persons 2009:** The Policy promotes and contributes to the attainment of the development goals. This policy informs other policies, programmes and sectoral plans. It will provide a framework for:
    i. Enhancing the recognition of the roles, contributions and potentials of older persons in the development process;
    ii. Strengthening the informal and formal community-based support systems and actions for older persons' dignity;
7. **The National Equal Opportunities Policy 2006**: The goal of the National Equal Opportunities policy is to provide avenues where individuals and groups' potentials

are put to maximum use by availing equal opportunities and affirmative action;

8. **Uganda Gender Policy 2007:** The Uganda Gender Policy mandates the Ministry of Gender, Labour and Social Development and other line Ministries to mainstream gender in all sectors;

9. **National Policy on Disability 2006:** The National Policy on Disability in Uganda aims at promoting equal opportunities for enhanced empowerment, participation and protection of rights of PWDs irrespective of gender, age and type of disability;

10. **The National Orphans and other Vulnerable Children's Policy 2004:** The Policy focuses on full development and realization of rights of orphans and other vulnerable children. Specifically, to ensure that the legal, policy, and institutional framework for child protection is developed and strengthened at all levels and that, orphans, vulnerable children and their families access basic essential services package as well as ensuring that, resources for interventions that benefit orphans and other vulnerable children are mobilized and efficiently utilized; and

11. **The National Social Protection Policy, 2015:** This policy addresses the fact that social protection is a pre-requisite for social development.

3.2. Legal Framework

The laws that relate to management of labour in regard to working conditions, fair treatment and non-discrimination, prevention of forced labour and child labour and protection of vulnerable workers include: -

1. **The Uganda Constitution of the Republic of Uganda, 1995:** The Constitution under articles 31, 39 and 40 guarantees (inter alia) every Ugandan a right to gender equality, labour rights, and equal opportunity in political, economic, and social activities, including through affirmative action; the right to a clean and healthy environment without endangering human health and the environment as well as the right to work in safe and satisfactory conditions. The Constitution guarantees, in its Objective XIV (a), the right of all Ugandans to (inter alia) freedom of association, the right to collective bargaining, and paid vacation (Chapter Four).

2. **The Employment Act of 2006:** The Employment Act is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, repatriation, management and compensation of workers. Section 32 of the Act prohibits employment of children under 12 years. The Act also prohibits employment or work, which is injurious to a child's health, dangerous, hazardous or otherwise unsuitable. This Act spells out general principles regarding forced labour, discrimination in employment, sexual harassment and provisions to settle grievances. It also provides for matters governing individual employment relationships in terms of circumstances of provision of labour.

The Employment Act provides for the basic conditions of employment with a view of improving the status of employees in Uganda. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. It further mandates the Ministry responsible to issue Wages Regulations on a regular basis which deals with worker's terms and conditions of each industry. **The Employment (Employment of Children) Regulations, SI No. 17, 2012** under the Employment Act gives restrictions on employment of children under the age of fourteen years. These shall not be employed in any business undertaking or workplace, except for light work carried out under the supervision of an adult and where the work does not exceed fourteen hours per week. This regulation also prohibits unsuitable and hazardous work for children, i .e. work which is injurious, dangerous, hazardous or in the worst forms of child labour. **Employment (Sexual Harassment) Regulations, 2012.** The regulations define sexual harassment in an employment setting and the measures for its prevention and management.

3. **The Children's (Amendment) Act 2016:** This is the law that ensures the protection and development of children. The law provides that the age of 16 is the minimum age for employment provided the work is not harmful of hazardous[3]. And on the GROW project the children's ACT 2016 provisions will be used and cap the employment age at 16.

4. **The Public Health Act Cap.281:** Part IX Sanitation and Housing: No person shall cause a nuisance, or shall suffer to exist on any land or premises owned or occupied by him or her or of which he/she is in charge, any nuisance or other condition liable to be injurious or dangerous to health.

5. **The Workers Compensation Act of 2000:** The Act outlines matters of compensation for injuries and accidents as well as the responsibility of employees to take care of their health, health and safety while on the project. The Act entitles employees to automatic compensation for any personal injury from an accident arising out and in the course of his employment even if the injury results from the employee's negligence. The Act further details that, for an injury that leads to death, the compensation should be equivalent to an employer's monthly pay multiplied by 60 months. An employee must report any work-related injury or illness to the supervisor immediately or other

[3] "Harmful or hazardous work " includes work which exposes a child to physical or psychological torture, sexual abuse, work underground, work at dangerous heights or in confined spaces, work with dangerous machinery, equipment and tools, or manual handling or transportation of heavy loads, work with chemicals and dangerous substances, work under extreme temperatures, high levels of noise, or working for longer hours; or any other form of child labour which includes slavery, trafficking in persons, debt bondage and other forms of forced labour, forced recruitment for use in armed conflict, prostitution, pornography and illicit activities."

personnel of the organization. The Act applies to all employment within Uganda and to workers employed by or under the Uganda Government in the same way and to the same extent as if the employer were a private person, but not to active members of the armed forces. It also defines an employer as the Government of Uganda, any person incorporated or unincorporated, association or partnership, which directly engages a worker or which, in respect of any worker, carries on the business of hiring out his or her services.

6. **Occupational Safety and Health Act of 2006:** The Occupational Safety and Health Act of 2006 consolidates, harmonises and updates the law relating to occupational safety and health. The Act makes provisions for the health, safety, welfare and appropriate training of persons employed in workplaces. The Act provides for the prevention and protection of persons at all workplaces from injuries, diseases, death and damage to property. The act makes provisions for the health, safety, welfare and appropriate training of persons employed in workplaces, which are consistent with a range of safeguards policies such as ILO Core Labour Standards, IFC PS 2, 3 and 4. The Act imposes obligation on employers to ensure the safety of employees at work, thus requiring them to put in place measures for the achievement of this purpose e.g. provision of protective gear against the effect of pollution, to monitor and control the release of dangerous substances into the environment, to supervise the health of workers who are exposed to dangerous hazards due to pollution and other harmful agents e.g. through periodic medical examination, keeping medical records of workers, ensuring that work premises remain safe and without risk to health, displaying safety precautions etc. The Act requires workplaces to be kept in a clean state to have suitable lighting to ensure that buildings at a work place are of sound construction, to have adequate supply of wholesome drinking water accessible to by all workers, adequate facilities for taking meals, a first aid room etc.

7. **Labour Disputes (Arbitrations and Settlement) Act (2006):** The Act provides for arbitration in labour related grievances and is emphasized during project planning and implementation. The Act seeks to promote social dialogue, facilitate collective bargaining, and modernize procedures to address unresolved or mismanaged labour disputes that may have adverse effects. The 2011 Employment Regulations deter employers from the casualization of labour by granting contractual/permanent rights to any worker exceeding four (4) months of service.

8. **National Social Security Fund Act:** The NSSF Act that obliges employers to deduct 5% of an employee's salary and make a 10% contribution towards the Employee's savings with NSSF.

9. **The National Environment Act, 2019:** Specifically, the Act provides that, every person in Uganda has a right to a clean and healthy environment in accordance with the Constitution and the principles of sustainable development. A person may, where the

right referred to herein above is threatened as a result of an act or omission by any person which has/is likely to cause harm to human health or the environment take a legal process against the person whose act or omission has/or is likely to cause harm to human health or the environment.

3.3. Institutional Framework

The following are some of the key institutions in the implementation of this Plan. They are:

1. Ministry of Gender, Labour and Social Development (MGLSD)
2. Ministry of Finance, Planning and Economic Development (MoFPED)
3. Private Sector Foundation Uganda (PSFU)
4. Office of the Prime Minister (OPM)
5. Ministry of Local Government (MLG)
6. Ministry of Lands, Housing and Urban Development (MoLHUD)
7. Ministry of Health (MoH) - Health Facilities
8. National Environment Management Authority-NEMA
9. National Organization of Trade Unions-NOTU / Central Organization of Free Trade Unions - COFTU
10. Contractors as well as their sub-contractors.

3.4. World Bank Environment and Social Standards (ESS)

The standards that directly apply to this instrument and workers include the following World Bank Environment and Social Standards: (ESS2, ESS4, and ESS10)

ESS2 Labour and Working Conditions: This Standard obliges the Developer/Project Proponent (MGLSD) to develop and implement written labour management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national laws. ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers. Where government civil servants are working in connection with the project (whether fulltime or part-time), they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to government civil servants.

The key objectives of the World Bank's ESS2 are to:

i. Promote safety and health at work.
ii. Promote fair treatment, non-discrimination and equal opportunity for project workers.
iii. Secure protection of 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.
iv. Prevent the use of all forms of forced labour and child labour.

v. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
vi. Provide project workers with accessible means to raise workplace concerns.

ESS4 Community Health and Safety: The Standard puts emphasis on community exposure to risks and impacts of project and includes risks associated with the security of personnel as well as addressing water-related, communicable and non-communicable diseases that can result from project activities and have impact on project labour as well as the community;

ESS10 Stakeholder Engagement and Information Disclosure: The Standard establishes a systematic approach to stakeholder engagement, helping to identify, build and maintain a constructive relationship with stakeholders or project-affected parties. It guides on assessing the level of stakeholder interest and project support required to enable stakeholders' views to be taken into account in project design and environmental and social performance. It promotes and provides means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them, ensures that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format as well as providing project-affected parties with accessible and inclusive means to raise issues and grievances, and allow such grievances to be responded to and managed.

4. ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

4.1. Key Labour Risks:

The project presents labour, employment as well as occupational health and safety risks that may arise from the various project components, sub components and activities, especially construction, equipping and operating the public facilities. These include but are not limited to: lack of employment contracts, summary dismissals, lack of proper gender-sensitive sanitary facilities, discrimination in recruitment – particularly of vulnerable and disadvantaged individuals or groups, excessive overtimes, delayed payments, lack of meals and drinking water, child labour, and Gender Based Violence, sexual exploitation and abuse/sexual harassment (SEA/SH).

Occupational health and safety risks that may arise from the construction and equipping of public facilities include Injuries, diseases and fatalities resulting from cuts, falls, etc., electrocution, dust, noise and body vibration from machinery/equipment.

The labour (including occupational health and safety) risks for the project can be defined based on the nature and location where project activities will be carried out. Labour risks, including

occupational health and safety specific risks, in relation to the activities being carried out by the workers, are summarised in the table below:

TABLE: KEY GROW PROJECT LABOUR RISKS

PROJECT SUB COMPONENT	KEY LABOUR RISKS
1A - Supporting creation and strengthening of women platforms, community mobilization, and mind-set change	1. Exposure of project staff, project beneficiaries and other stakeholders to different forms of cyber bullying/harassment by other internet users 2. Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders. While undertaking project work 3. Trauma resulting from interacting with marginalized and/or impoverished people from communities
1B - Support for core business development for micro and small enterprises 1C - Support for trade/sector specific skills 1D - Women entrepreneurship work placement program	1. Failure for contracted staff to meet the terms and conditions of their employment contracts 2. Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders. While undertaking project work 3. Project staff, suppliers and other stakeholders transmitting and contracting COVID-19 or other communicable diseases like malaria, typhoid etc. as a result of human interaction during project work 4. Loss of human lives or sustaining of injuries due to motor accidents during project work 5. Project workers could be subjected to unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender and religion. These risks apply to workers on sub-projects, as well as staff employed and engaged by the project 6. Failure for intended project beneficiaries to meet the minimum terms and conditions to qualify to benefit from the project 7. Possibility of not complying with the basic legal requirements of the labour laws including fair and timely payment, weekly rest, etc.
2B - Facilitating access to credit for enterprise growth	1. Discrimination in relation to recruitment, hiring, compensation of project staff, partners, primary suppliers

PROJECT SUB COMPONENT	KEY LABOUR RISKS
2C - Enhanced Loan Products and Processes for Women Entrepreneurs 3A - Multi-purpose service and production facilities to boost women enterprise productivity 3B - Enabling Access to Gender Inclusive Workplace Infrastructure	and contractors – particularly for vulnerable and disadvantaged individuals or groups. 2. Abuse of human and workers' rights 3. Interpersonal conflicts between workers. 4. Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA/SH) and Sexually Transmitted Diseases, including HIV/AIDS 5. Possibility of Forced labour and child labour 6. Perception that some employees are treated better and receive better wages, salaries and conditions of employment than others. 7. No grievance redress channel for workers 8. Exposure of workers and community members to occupational health and safety (OHS) risks and hazards such as construction noise, dust and vibrations from exposure to construction equipment, operations and transport vehicles. 9. Possible improper housekeeping, storage and management of materials and waste on project sites leading to solid waste accumulation 10. Poor work safety culture, accidents/incidents, Lack of provision of PPEs 11. Loss of human lives or sustaining of injuries or ill health due to motor or work-related accidents 12. Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders. 13. . 14. Exposure of project staff, project beneficiaries and other stakeholders to sexual, psychological and physical harassment by the public. 15. Hostility and security threats from communities. 16. Possibility of not complying with the basic legal requirements of the labour laws on labour recruitment, contracting, deployment, remuneration, repatriation, management and compensation of workers.
4A: Project management support for high-quality implementation.	1. Discrimination in relation to recruitment, hiring, compensation of project staff and partners – particularly for vulnerable and disadvantaged individuals or groups.

PROJECT SUB COMPONENT	KEY LABOUR RISKS
4B: Policy innovation and evidence generation.	2. Abuse of human and workers' rights 3. Interpersonal conflicts between workers. 4. Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA/SH) and Sexually Transmitted Diseases, including HIV/AIDS 5. Forced labour 6. Perception that some employees are treated better and receive better wages, salaries and conditions of employment than others. 7. No grievance redress channel for workers 8. Poor work safety culture, accidents/incidents, Lack of provision of PPEs 9. Loss of human lives or sustaining of injuries due to motor accidents 10. Untenable overtime, psychological distress, fatigue, occupational burnout among project staff and other stakeholders. 11. Possibility of not complying with the basic legal requirements of the labour laws on labour recruitment, contracting, deployment, remuneration, repatriation, management and compensation of workers.

4.2. Occupational Health and Safety (OHS)

The contractors and sub-contractors will be committed to the safety and health of their employees and non-employee workers at the worksite and will operate in collaboration with and to the requirements of the local health authorities. In addition, the Contractor will have to prepare a Health and Safety Management Plan which outlines specific health and safety related policies and procedures to be followed during the construction under component 3.

The Contractors will comply with the Government of Uganda's Workers' Compensation Act, 2000 which outlines the compensation to workers for injuries suffered and Scheduled diseases incurred during the course of employment.

MGLSD recognizes the importance that workplace must be safe and without risk of injury to employees. Ugandan regulations require basic protective clothing for construction including proper foot protection, overalls where needed, protective gloves, and raincoats for wet weather work.

MGLSD alongside contractor's health and safety policies will comply with applicable provisions of the Ugandan Occupational Safety and Health Act, 2006, as well as applicable ILO clauses C155-

Occupational Health and Safety 1981; C167–Safety and Health in Construction 1988, and ILO Code of Practice on Safety and Health in Construction 1992 which covers safety and health planning, co-ordination and compliance.

4.2.1 Protective Clothing and Personal Protective Equipment

In accordance with Section 19 and 91 of the Uganda Occupational Safety and Health Act, 2006, the contractor will provide and equip all employees with the appropriate personal protective equipment (PPE) and gear to adequately protect them from hazards associated with their specific occupation. The Contractor or his or her sub-contractor will ensure that all PPE including protective clothing and equipment purchased for use by its employers is manufactured to such a nationally and internationally recognized standard as to ensure adequate protection against injury and accident. The contractor will also ensure that any sub-contractors involved with the construction phase of the BIP provide the appropriate level of PPE to their employees.

4.2.2 First Aid

In accordance with Section 55(1-8) of the Uganda Occupational Health and Safety Act of 2006, the contractor will provide and maintain adequate first aid facilities appropriate to the conditions of work being undertaken for the sub project, including a trained first aider. Scale of first aid facilities will be related to the size of the job. In the event of a medical emergency, the contractor will also make arrangements to evacuate injured persons to a health centre.

4.2.3 Measures against Insect and Pest Nuisance and other biological hazards

The civil works will be committed to taking the necessary precautions to protect all employees and non-employee workers on the worksite from insect nuisance, rats and other pests and reduce the dangers to health and the general nuisance occasioned by the same. It will comply with all the regulations of the local health authorities in these respects and shall in particular arrange to spray thoroughly with approved insecticide all buildings erected on the worksite. Such treatment will be carried out at least once a year or as instructed by local health authorities. The project management will warn its employees and non-employee workers through signage and orientation training of the dangers of water borne diseases and wild animals. Expatriate workers will be given the access to appropriate preventative medications and vaccines.

4.2.4 Epidemics and other health concerns

In the event of any outbreak of illness of an epidemic or communicable nature, the project will comply with and carry out such regulations, orders and requirements as may be made by the Government, World Health Organization or the local medical or sanitary authorities, for the purpose of dealing with and overcoming the epidemic.

4.2.5 Prevention of Accident or Injury to Workers

Except as required by Ugandan Law, contractor will not be liable for or in respect of any damages or compensation payable to any employee, other than death or injury resulting from any act or default of, his or her self, his or her agents or delegated representatives.

4.2.6 Reporting of Accidents

The Contractor will ensure any sub-contracts established with non-employee workers for the GROW project will outline the responsibilities to report to appropriate project staff the details of any accident as soon as possible after its occurrence. In the case of any fatality or serious accident, contractor would ensure that the sub-contractors are aware of the importance to notify the contractor immediately by the quickest available means following an accident (Ref. to HSMP).
Records of Safety and Health
The contractor will maintain safety and health records and make available to the appropriate authorities any reports concerning safety, health and welfare of persons and property or environmental damage.

4.2.7 Welfare Amenities

In accordance with Section 50 of the Uganda OSHA, 2006, contractor will in so far as is reasonably practicable, having regard to local conditions, provide on the worksite an adequate supply of potable and non-potable drinking water for the use of his or her employees and non-employee workers.

In accordance with Section 49 of the Uganda OSHA, 2006, the contractor will provide and maintain adequate and gender separate sanitary latrine or toilet accommodation for the use of the employees and non-employee workers for the GROW project and shall keep the whole of the facility and latrines in a clean and sanitary condition in accordance with the requirements of the local Authorities of the Government.

In accordance with Section 54 of the Uganda OSHA, 2006, contractor shall provide suitable facilities appropriately furnished for the preparation and consumption of food.

With respect to expatriate workers, the project shall provide and maintain such accommodation and amenities as may be considered necessary for employees or non-employee workers employed for the purposes of or in connection with the GROW project and these shall be gender separate.

4.2.8 No Alcoholic Liquor, Drugs, and Firearms

The contractor will not import, sell, give, barter or otherwise dispose of any alcoholic liquor or illegal drugs, or permit or suffer any such importation, sale, gift, barter or disposal by its employees, labour or contractors. The Contractor will not give, barter or otherwise dispose of any arms or ammunition of any kind or permit or suffer any such action by its employees, labour or contractors.

4.2.9 Festivals and Religious Customs

In all dealings with his or her staff and labour, contractor will have due regard to all recognised festivals, days of rest and religious or other customs. It is recognized that some form of construction activities will be required during these times and will managed as described in the section on Working Hours.

4.2.10 Disorderly Conduct

The Contractor will at all times take all reasonable precautions to prevent any unlawful, riotous or disorderly conduct by or amongst his or her staff and labour and for the preservation of peace and protection of people and property in the neighbourhood of the GROW project.

4.3. Engagement of Labour

The contractor's preference is to employ local staff where possible and with the required qualifications and experience. The project will make arrangements for the engagement of expatriate labour and for the housing, health, welfare and repatriation of the same. Contractor will be responsible for the return of expatriates to the place where they were recruited following the termination of their employment.

The Contractor will comply with the applicable provisions of ILO policies regarding avoidance of forced labour. The contractor may from time to time employ casual/temporary labour for the BIP. Contractor will keep records to include information on casual/temporary labour and intends to avoid long term status of casual workers.

4.4. No Employment of Children or engagement of forced or compulsory labour

The ILO definition of a child is a person of 14 years of age or under. If hazardous work is involved, then the minimum age is 18 years. Applicable conventions adopted by the ILO to be applied include C138 -Minimum Age 1973; and C182-Worst Forms of Child Labour 1999.

In accordance with the Ugandan Employment Act (2006) Section 32, contractor will forbid the employment of anyone under the age of 18. Ugandan Law forbids the employment of any child under the age of 14 unless it is light work, does not interfere with schooling and only under the direct supervision of a person age 18 or over.

In accordance with the Children's (Amendment) Act, 2016 the minimum age for employment under GROW will be 16 years provided the work is not harmful or hazardous (see definition of harmful/ hazardous work and provisions as summarised in section 3.2 of this LMP). As part of community mobilisation and sensitisation, all parents, guardians and community members will be discouraged from withdrawing children from school to take part in GROW supported skilling and subsequent employment under subprojects. Maximum life-long social-economic returns for

a child are partly dependent of formal schooling. Even hands on skills obtained are best marketed and utilised by those with minimum formal schooling.
No employee shall be engaged for work against their free will, in accordance with the requirements of the ILO Convention on forced labour.

4.5. Record Keeping

Section 18 of the Minimum Wages Advisory Boards and Wages Councils Act, Cap. 221 established by the Government of Uganda addresses record and notice requirements for employers where a wages regulation order applies. Section 21 of this act addresses penalties for false entries or records. Section (50) of the Ugandan Employment Act stipulates the requirement of the employer to provide pay statements.

The Contractor will keep proper records of the time worked by every employee engaged on the BIP irrespective of the employee's method of payment (hourly or salary), the class of work on which employed and the wages paid. The project will also keep proper records for every employee engaged, their gender, the class of work in which employed, whether as a casual or permanent employee, and the wages (and allowances if any), paid in accordance with Ugandan regulations. These records will be available at any time for inspection by authorized lender representative or authorised representative of the government. The Contractor will produce, if required, other records that may be necessary to provide evidence of their compliance with the requirements of this paragraph.

4.6. Workers Grievance Mechanism

Project workers are anticipated have grievances during their period of employment on project activities. The Project is required to "establish a grievance mechanism to receive and facilitate resolution of the affected workers' concerns and grievances. Detailed guidance on this is presented in section 7 below.

4.7. HIV/ AIDS POLICY

The ILO's Code of Practice on AIDS recognizes HIV/AIDS as a workplace issue and goes beyond raising awareness to include non-discrimination, confidentiality, care and support. UNAIDS and other agencies produce guidelines of employer good practice with regard to HIV/AIDS. The GROW project contractor will also follow applicable Ugandan national policy on HIV/AIDS.

The contractor will arrange for its employees to attend an HIV awareness programme provided in accordance with the HIV/AIDS Policy and UNAID guidelines by a third-party organisation such as The Aids Support Organisation (TASO). The programme will take place during its employee's normal working hours. HIV/AIDS management programmes will be subject to the normal monitoring process of the BIP. Further information about the HIV awareness programme is provided below.

The GROW project contractors will:

i. Retain services of a Nominated Service Providers to provide an HIV/AIDS Awareness Programme to Employees and the Local Community;
ii. Give any representative of the Nominated Service Provider all reasonable access to the worksite in connection with the HIV/AIDS Awareness Programme;
iii. Instruct Employees to attend the HIV/AIDS Awareness Programme in the course of their employment and during their normal working hours or any period of overtime provided for in the relevant employment contracts and uses all reasonable endeavours to ensure this instruction is followed;
iv. Provide suitable space for delivery of the HIV/AIDS Awareness Programme; and,
v. Referral to testing, counselling and advice on HIV/AIDS in compliance with UNAIDS guidelines.

The GROW project implementation and management teams will treat HIV/AIDS the same as other life-threatening illnesses and handicaps in terms of our policies and benefits where they apply. The project shall not discriminate against a qualified individual with regard to job application, hiring, advancement, discharge, compensation, training, or other terms, conditions or privileges of employment. It is recognized that an employee with HIV/AIDS or another life-threatening illness may wish to continue in as many of his/her normal pursuits as his/her illness allows, including work. As such, the Contractor will be supportive of and make reasonable accommodation for the employee who is medically able to perform his/her job. An employee's medical information is personal and will be treated as confidential.

While accommodating employees with life-threatening diseases and other disabilities, however, it is recognized that, obligation to provide a safe work environment for all employees will rest with the Contractor. The Contractor ought to be sensitive and responsive to co-worker's concerns and will emphasize employee education. The Contractor will continue efforts to be adequately informed about HIV/AIDS and will make this information available to employees on a regular basis.

People with AIDS or HIV infection are entitled to the same rights, benefits and opportunities as people with other serious or life-threatening illnesses;

Employment practices comply with local laws and regulations and/or the practices of the parent company, whichever is greater, and where applicable;

Employment practices are based on the scientific and epidemiological evidence that people with HIV/AIDS do not pose a risk of transmission of the virus to co-workers through ordinary workplace contact;

Senior management unequivocally endorses non-discriminatory employment practices and education programs or information about HIV/AIDS, the contractor will communicate policies and practices to employees in simple, clear, and unambiguous terms;

The contractor will provide employees with sensitive, accurate and up-to-date information about risk reduction in their personal lives;

The contractor will protect the confidentiality of employee's medical insurance information.

To prevent work disruption and rejection by co-workers of an employee with HIV/AIDS or STI/STD infections, the contractor will undertake education for all employees before such an incident occurs and as needed thereafter; and

The GROW project management will not require HIV/AIDS screening as part of pre-employment or general workplace physical examinations.

5. POLICIES AND PROCEDURES FOR MANAGEMENT OF KEY POTENTIAL LABOUR ISSUES

Measures that should be followed during project implementation to address labour risks are provided below:

a) All employers on this project shall develop and implement procedures to establish and maintain safe workplaces;
b) All parties involved in employing or engaging project workers shall make sure to provide full information to workers, and conduct training for them about OHS requirements.
c) Personal protective equipment should be provided to workers without expense to them.
d) Clear processes and procedures shall be available to workers to enable them to report work situations that they believe are not safe or healthy, and accordingly remove themselves.
e) Facilities appropriate to the circumstances of the works will be provided to the project workers.
f) A system of regular review of OHS performance and the working environment will be put in place.
g) A safety Plan shall be provided before the beginning of works on the project.
h) Insurance of project workers, equipment and machinery.

5.1. Contractor Management and Monitoring

The contractor shall be required to monitor, keep records and report on terms and conditions related to labour management. Records should include:

a. ***Labour conditions:*** records of workers engaged under the Project, including contracts, induction of workers including code of conduct, hours worked, remuneration and deductions (including overtime) etc.

b. ***Safety:*** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).

c. ***Workers:*** number of workers, indication of origin (expatriate, local, non-local nationals), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).

d. ***Training/induction:*** dates, number of trainees, and topics. These shall also include toolbox talks held with the workers

e. ***Workers' grievances***: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

The monitoring will be strengthened through a World Bank enhanced implementation support and monitoring.

5.2. Application of Labour Legislation related to Occupational Health and Safety

Managing occupational health and safety procedures will be based on Uganda's Occupational Safety and Health Act, 2006; Employment Act, 2006, and World Bank's Environmental and Social Standards: ESS2 on Labour and Working Conditions and ESS4 Community Health and Safety. Key OHS measures are as follows:

a) Procedures to ensure establishing and maintaining safe working conditions.

b) Reporting channels for workers to report work situations that they see are not safe or healthy.

c) Compliance to requirements of the OHS Act by employers (contractor and sub-contractors).

d) A system for continual review of OHS performance and conditions in workplace environment.

5.3. Child Labour and Age of Employment

a) Persons under the age of 18 will generally not be employed or engaged in connection with this project.

Those who are 16 years and above but below 18 will strictly be employed in accordance with provisions of the Children's (Amendment) Act, 2016 which prohibits harmful or hazardous work. Such children their households would be identified and an adult encouraged to take part in project related activities that supports the household and linked to other project support to benefit from livelihood activities such as;

- Conditional and unconditional cash transfers
- mentoring and support with vocational training

- referrals into social welfare and social protection schemes

b) Age of workers will be verified from their national identity documents.

c) If an underage worker is found on the project, the contractor who employed such workers shall be stopped from working and be given a notification to change such workers

5.4. Terms and Conditions of Employment

a) Wages shall be paid to the project workers by the contractors according to Ugandan laws.

b) Maximum number of hours that can be worked on the project is 8 hours a day. Any extra hours worked will be counted as overtime and paid for in accordance with the Employment Act, 2006

c) All other terms and conditions specified in the Ugandan labour laws and World Bank's OHS requirements applicable to the project.

6. RESPONSIBLE STAFF

The MGLSD, which is the coordinating sector for the GROW project will assume overall responsibility for management and oversight of workers in the project in line with a mechanism described further in details in the Project ESMP. The two PITs under MGLSD and PSFU have the overall responsibility to oversee all aspects of the implementation of the LMP, to ensure that project sub-components comply with the Labour Procedures.

However, implementation of the project will be done in collaboration with several other stakeholders at national, district, project and community Level who will also be expected to assist in management of workers within their areas of jurisdiction in the project. Thus, successful management of project workers requires clear definition of roles and responsibilities of key players and stakeholders at school, community, district and national levels.

6.1. Key Staff Responsible

The Table below shows entities and their roles in managing workers or staff of this project. This table can be updated as project circumstances deem necessary. The LMP will be updated with standard template of contracts.

TABLE: Entities and roles in managing project workers or staff

Activity	Responsible entity
Engagement and management of project workers	Contractors who will be supervised by the PIT of MGLSD
Engagement and management of contractors/subcontractors	Consulting Engineering Companies who will be supervised by the MGLSD
Occupational health and safety (OHS)	Ministry of Gender Labour and Social Development
Training of project staff	MGLSD
Addressing workers' grievances	MGLSD

7. GRIEVANCE REDRESS MECHANISM

7.1. Introduction

The project will continue to strengthen and revise the Grievance Redress Mechanism (GRM) established during project implementation through the appropriate institutional structures for Project management at national, district and community levels. Notifications about the grievance mechanism will be carried out through sensitization during the community and worker sessions. A wide range of project-affected people: community members, members of vulnerable groups, project implementers, civil societies, and the media shall register grievances. Grievances will also continue to be received through established MGLSD communication channels.

The project will establish a Grievance Mechanism System as a formal process for receiving, evaluating and resolving program-related grievances from affected workers. Grievances may be reported in form of claim, complaint or issue related to participation in works, benefit-sharing, compensation benefits etc. Various stakeholders will be sensitized on how to lodge a grievance during project implementation. In implementing an effective grievance, management system consideration shall be given to the resulting from the following:

- Disciplinary action
- Individual grievances
- Collective grievances and negotiation of collective grievances
- Gender-based violence, sexual exploitation and workplace sexual harassment.

Besides the grievance mechanism for the overall project, a separate Grievance Redress Mechanism (GRM) will be established for project workers. Workers will be able to lodge their complaints relating to their work environment or conditions through the set Worker's GRM

7.2. Grievance Redress Mechanism Guidelines

The mechanism for workers' GRM will be based on the following principles:

1. Handling of grievances will be objective, prompt and responsive to the needs and concerns of the aggrieved workers.
2. The process will be transparent and allow workers to express their concerns and file grievances.
3. There will be no discrimination against those who express grievances.
4. All grievances will be treated confidentially, and individuals who submit their comments or grievances may request that their name be kept confidential.
5. Anonymous grievances will be considered and received through toll-free to be established by the project, and anonymous grievances will be treated equally as other grievances, whose origin is known.
6. The GRM will be accessible by all project staff.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", websites, brochures, emails, messages and other means as needed.

Grievances raised by workers at all project levels and actions taken will be documented by the Social Development Specialist (SDS) under the PIT. The periodic summary of grievance cases will be reported to the PIT and will form part of the project periodic reports. Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the PIT.

7.3. Disciplinary Procedure

The starting point for all disciplinary action is rules. These rules may be implied or explicit. Some rules are implied in the contract of employment (e.g. rule against stealing from the employer, sexual harassment, use of drugs etc.), it is recommended that even implied rules be included in the disciplinary code or code of conduct.

7.4. Grievance Procedure

It is recommended that contractor(s) who will be engaged for the project provide their grievance procedure as a requirement for tender which, at a minimum, should comply with

MGLSD requirements. The workers GRM established by the contractor will comply with the principles for the project GRM and will be used to address workers related grievance. This must have workers' representatives and complaints from workers should not be used for retaliation.

There shall be established subproject specific Grievance Management Committees (GMCs) GMCs comprising of the employers', selected community members or leaders and democratically elected workers' representatives. The subproject GMC shall be able to feed into the General Project Grievance Resolution Mechanism for the GROW Project, as elaborated in the GROW Project ESMF.

The existence of these GMCs shall be publicized, including the procedure for engaging the GMCs, in languages that apply in those respective sub project locations. Where possible, pictorial illustrations will be used to sensitize the illiterate workers and community members about the GRM and the procedures of lodging / logging, receiving, documenting, tracking and resolving requests, complaints or disputes for resolution.

The GMC will record and handle all subproject specific grievances which may be lodged in writing or verbally with the worker's representative who will then write it down on behalf of the complainant. All grievances and resolutions at every stage shall be documented.

After grievance/dispute resolution, the outcomes, shall be communicated to the person that lodged / logged the complaint or issue.

There shall be mechanisms to regularly review and make improvements to the sub project specific Grievance management mechanism to enhance its effectiveness.

7.5. Grievance Redress Committee (GRC)

Workers Grievance Redress Committees (GRCs) shall be constituted at various levels to implement the GRM for the project including subproject level, District level and National level.

Roles of the GRCs

The Grievance Redress Committees will be responsible for:

1. Communicating with the Aggrieved persons (APs) and evaluate if they are entitled to recompense;
2. Making the list of aggrieved person(s) public and the established grievance redress procedure.
3. Recommending to the Social Development Specialist (SDS) of the PIT solutions to such grievances from affected persons;

Communicating the decisions to the APs; to acknowledge appeals from persons, households or groups who rightfully will not be affected by the project, but claim to be, and to

recommend to the PIT whether such persons should be recognized as AP's, and to communicate back the decisions to the Claimants.

7.6. Workers Grievance Redress Process

The process of grievance redress will start with registration of the grievance(s) to be addressed, for reference purposes and to enable progress updates of the cases. Thus, the aggrieved worker will file a complaint with the Grievance Redress Committee through its secretary. Different ways in which workers can submit their grievances will be allowed, such as submissions in person, by phone, text message, mail and email.

Grievances will then be registered in a registry of complaint and all information related to the handling of the grievances will be recorded in the registry. Contract workers will be informed of the grievance mechanism at the induction session prior to the commencement of work, and the contact information of the GRM focal person and the PIT will be shared with contract workers.

The officer receiving the complaint (secretary to the GRC member) will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The response time will depend on the issue to be addressed but it should be addressed with efficiency. The social safeguard officer will also ensure that the aggrieved worker receives feedback of the receipt of the complaint.

In the spirit of allowing workers to quickly report labour issues, and allowing the project to respond and take necessary action immediately, would be important. Thus, the grievance raised will be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of the grievance, health and safety concerns in work environment or any other urgent issues will be addressed within 10 working days.

The Grievance committee will act on the case within 10 working days of receipt of the grievance(s). If no amicable solution is reached, or the affected person does not receive a response within 14 working days, the aggrieved worker can appeal to higher authorities (district level), which should act on the grievance within 15 working days of its filing.

Where the grievance cannot be addressed within 10 working days at district level, the aggrieved worker will be informed in writing, so that the worker can consider proceeding to the national appeal process and structures (MGLSD or courts of law) guided by the Labour Disputes (Arbitrations and Settlement) Act No. 8 of 2006. The Employment Act 2006 also provides for the Formal Grievance Procedure in case a worker who has been laid-off, retrenched, discharged, dismissed, removed, or otherwise terminated from employment.

These timelines are further illustrated in the table below:

TABLE: Typical Steps in a Grievance Redress Process

Steps	Process	Description	Completion Time frame	Responsible Agency/Person
1	Receipt of complaint	• Document date of receipt, name of complainant, location village, nature of complaint, • Acknowledgement of grievance	1 day	Secretary to GRC at project level & GMC in project area.
2	Assessment, Analysis and Response	Assess, gather evidence and take necessary action,	7 days	GRC
3	Resolution and registry	• Where complaint is justified and a resolution has been arrived at, Aggrieved worker) accepts and signs the resolution • Received complaints will be recorded in the complaints logbook or grievance excel-sheet/grievance database.	1-2 day after assessment	Aggrieved workers, Social safeguard officer & Secretary to GRC
4	Implement and monitor a redress action	Carry out grievance redress in line with employment act	14 days or at a time specified in writing to the aggrieved worker	PC-PIT & Social Development Specialist
5	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	10 days of receiving status report	PC-PIT & Social Development Specialist
6	Appeals process (Judicial adjudication)	Take complaint to district labour office	No fixed time	Complainant

7.7. WORLD BANK GRIEVANCE REDRESS SYSTEM

Project workers 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 the project's labour related issues. Project workers 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 *http://www.worldbank.org/en/projectsoperations/products-andservices/grievance-redressservice*. For information on how to submit complaints to the World Bank Inspection Panel, please visit; *www.inspectionpanel.org*.

ANNEX 1: SUMMARY OF RATIFICATION OF ILO FUNDAMENTAL CONVENTIONS BY UGANDA

Conventions	Date of Ratification
ILO Convention 87 on Freedom of Association and Protection of the Right to Organize	Date of Ratification: 02 Jun 2005 Status: In Force
ILO Convention 98 on the Right to Organize and Collective Bargaining	Date of Ratification: 04 Jun 1963 Status: In Force
ILO Convention 29 on Forced Labour	Date of Ratification: 04 Jun 1963 Status: In Force
ILO Convention 105 on the Abolition of Forced Labour	Date of Ratification: 04 Jun 1963 Status: In Force
ILO Convention 138 on Minimum Age (of Employment)	Date of Ratification: 25 Mar 2003 Min Age: 14 years Status: In Force
ILO Convention 182 on the Worst Forms of Child Labour	Date of Ratification: 21 Jun 2001 Status: In Force
ILO Convention 100 on Equal Remuneration	Date of Ratification: 02 Jun 2005 Status: In Force
ILO Convention 111 on Discrimination (Employment and Occupation)	Date of Ratification: 02 Jun 2005 Status: In Force

ANNEX 2: 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 will 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 will conduct awareness raising and training activities to ensure that workers abide by the Code of Conduct (such as through toolbox talks). The Contractor will also ensure that local Project-affected 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:
   1) Compliance with applicable **laws, rules, and regulations** of the jurisdiction
   2) Compliance with applicable **health and safety requirements** (including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)
   3) The use of **illegal substances**
   4) **Non-Discrimination** – Particularly for vulnerable and disadvantaged Individuals or groups (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction)
   5) **Interactions with community members** (for example to convey an attitude of respect and non-discrimination)
   6) **Sexual harassment** (for example to prohibit use of language or behavior, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
   7) **Violence or exploitation** (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior)

8) **Protection of children** (including prohibitions against abuse, defilement, or otherwise unacceptable behavior with children, limiting interactions with children, and ensuring their safety in project areas)
9) **Sanitation** requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
10) Avoidance of **conflicts of interest** (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)
11) **Respecting reasonable work instructions** (including regarding environmental and social norms)
12) **Protection and proper use of property** (for example, to prohibit theft, carelessness or waste)
13) Duty to **report violations of this Code**
14) **No retaliation against workers** who report violations of the Code, if that report is made in good faith.
15) **Disturbing wildlife or bush meat hunting** workers prohibited under any circumstances from engaging in any disturbance of wildlife or bush meat hunting during the entire duration of their employment/engagement for the Project.

INFORMATION, TRAINING, INSTRUCTION AND SUPERVISION

All contractors and subcontractors must provide relevant information, training, instruction and supervision to protect all persons from risks to their health and safety arising from construction work carried out.

A range of activities can assist in ensuring people have the necessary knowledge and skills to complete the work safely, including general construction induction training and other training that may be specific to the workplace or the task the person is performing.

Information that might be provided includes workplace health and safety arrangements and procedures, such as for emergency evacuations. Information can be provided in various forms, including written formats or verbally, for example during workplace-specific training, pre-start meetings or toolbox talks.

General construction induction training provides basic knowledge of construction work, the work health and safety laws that apply, common hazards likely to be encountered in construction work, and how the associated risks can be controlled. Any person who is to carry out construction work must successfully complete general construction induction training, for example project managers and engineers, foreman, supervisors, surveyors, and labourers.

GENERAL WORKPLACE MANAGEMENT ARRANGEMENTS

The principal contractor must put in place arrangements for ensuring compliance with the following duties:

1. Providing a safe working environment
2. Zero tolerance to Child Labor
3. Providing and maintaining adequate and accessible facilities
4. Providing first aid
5. Preparing, maintaining and implementing emergency plans
6. Providing workers with PPE, if PPE is to be used to minimize a risk to health and safety
7. Managing risks associated with airborne contaminants
8. Managing risks associated with hazardous atmospheres including ignition sources I. Storage of flammable and combustible substances
9. Managing risks associated with falls, and
10. Managing risks associated with falling objects.
~~10.~~11. Managing risks associated with discrimination of vulnerable and disadvantaged individuals or groups

The principal contractors may put in place arrangements for ensuring compliance with the above requirements through contractual arrangements, but they cannot rely only on these arrangements to ensure compliance. The principal contractor may also coordinate with other subcontractors and check compliance whenever the principal contractor attends the construction site.

Part II: Code of Conduct for Contractors

Each employee including trainee or volunteer of a Contractor who have interaction with the Project must sign this "Code of Conduct."

In this Code, "Contractor" shall mean and apply to the contractor, its employees, sub-contractor, officers, agents, representative or those contracted through the Contractor to perform services authorized by the contract. The contractor agrees to adhere to this Code of Conduct when providing services to this project. The Code of Conduct is in addition to all other contract requirements, policies, rules and regulations governing delivery of services. The purpose of the code is to protect vulnerable people from abuse, neglect, maltreatment and exploitation. It clarifies expectation of conduct of the parties and their employees, which includes administrative staff, care staff, support services staff and any others when interacting with the project.

Contractor, its agents or representatives authorized through it shall not abuse, sexually abuse or sexually exploit, neglect, exploit or maltreat any fellow employees or people from general public/ community. Additionally, no person shall cause physical injury to any other person.

The Contractor shall not by acting, failing to act, encouragement to engage in, or failure to deter from will cause any person to be subject to physical or mental abuse, sexual abuse or sexual

exploitation, neglect, exploitation, or maltreatment. The Contractor shall not engage any person as an observer or participant in sexual acts.
Contractor understands and acknowledges that failure to comply with this Code of Conduct may result in corrective action, probation, suspension, and/or termination of contract.
Equally important to realize is that this Code also protects any person under the age of 18 years and any person 18 years of age or older who is physically or mentally handicapped or impaired due of mental illness, mental deficiency, physical illness or disability, or other temporary or permanent cause, to the extent that he is unable to care for his own personal safety.

1) Abuse shall include the following, but is not limited to:

1. Harm or threatened harm, meaning damage or threatened damage to physical or emotional health and welfare of any person.
2. Unlawful confinement.
3. Deprivation of life-sustaining treatment.
4. Physical injury including, but not limited to, any contusion of the skin, laceration, malnutrition, burn, fracture of any bone, subdural hematoma, injury to any internal organ, any injury causing bleeding, or any physical condition which imperils a person's health or welfare.
5. Any type of physical hitting or corporal punishment inflicted in any manner upon the body.

2) Sexual misdemeanour will include, but not be limited to:

Engaging in exploitive or manipulative sexual intercourse with any person. There will be zero tolerance to sexual misdemeanour including rape, defilement of minors/ sexual child abuse, sexual harassment and elopement.

1. Taking indecent liberties with a person, or causing an individual to take indecent liberties with a person, with the intent to arouse or gratify sexual desire of any person.
2. Employing, using, persuading, inducing, enticing, or coercing a person to pose in the nude.
3. Employing, using, persuading, inducing, enticing or coercing a person to engage in any sexual or simulated sexual conduct for the purpose of photographing, filming, recording, or displaying in any way the sexual or simulated sexual conduct. This includes displaying, distributing, possessing for the purpose of distribution, or selling material depicting nudity, or engaging in sexual or simulated sexual conduct.
4. Use of profanities and obscene language in communities or when instructing others.

3) Neglect may include but is not limited to:

1. Denial of sufficient nutrition to any person.
2. Denial of sufficient sleep to nay person.

3. Denial of sufficient protective gear to any person.
4. Failure to provide adequate supervision; leading to drug use in workplaces, accidents and impairment of employees
5. Failure to arrange for medical care and/or medical treatment for any person in an emergency.
6. Failure to drive courteously at all times, leading to accidents. g. Failure to avoid damage public property.
7. Neglecting public and employee complaints.

4) Drug abuse may include but is not limited to:

1. Smoke in public or smoking in undesignated areas
2. Consumption of alcohol while on duty/at work
3. Use and trading in narcotics

5) Illegal trade activities without necessary licenses:

1. Trade in protected fauna or flora species
2. Trade in ivory or similar regulated wildlife products including game meat c.

Trade in processed, semi-processed minerals and their ores

Financial exploitation will include, but is not limited to:
Utilizing labor of without paying for it, or at a non-commensurate financial rate/ wage.

Mistreatment will include, but is not limited to:

1. Assignment of unduly physically strenuous or harsh work.
2. Failure to behave in a polite and courteous manner to the general public
3. Requiring or forcing the individual to take an uncomfortable position, such as squatting or bending, or forcing people to repeat physical movements when used solely as a means of punishment.
4. Denial of any essential service solely for disciplinary purposes
5. Denial of visiting or communication privileges with family or significant others
6. Requiring the individual to remain silent for long periods of time solely for the purpose of punishment.

Contractor agrees to document and report abuse, sexual abuse and sexual exploitation, neglect, maltreatment and exploitation as outlined in this Code and cooperate fully in any resulting investigation. Contractor shall prominently display a poster, notifying contractor employees of their responsibilities and to report violations and giving appropriate phone numbers.

Contractor/ Employee/ Volunteer/ subcontractor

Signed:……. Date (dd/mm/yyyy):

Name: …….

ANNEX 3: SAMPLE EMPLOYMENT CONTRACT

The GROW Project Work Contract has been concluded between the Employer and the Employee whose names and addresses are written with their own free will and with the conditions stated below.

EMPLOYER'S

Name (Surname & First Name): …….

National ID Number: …….

Address: …….

WORKER'S

Name (Surname & First Name): …….

National ID Number: …….

Address: …….

A. EMPLOYER OBLIGATIONS

The management of the work and the workers is the responsibility of the Employer. The Employer and his/her representative shall apply the contract in all its provisions. The Employer evaluates and responds to complaints of workers regarding the implementation of the contract or other issues; corrects if the application has errors.

1- WAGE

Wage to be given to the worker by the Employer (based on Turkey Minimum Wage);

a) Daily / weekly / monthly …… TL

b) Piece work basis …….. TL

c) Other…… TL

2- DAILY WORKING AND REST PERIODS

In accordance with the time based working conditions, the working hours, weekly start and end times and legal break periods are determined by the Employer by taking into account. the local working hours, local customs and traditions, provided that the working hours remain constant for 40 hours per week, and maximum 10 hours per day including overtime. These are announced to the workers by the Employer and timesheets are provided. Exceeding the 40-hour weekly working time determined by this agreement is overtime. Overtime periods are paid by increasing the amount of the daily wage per hour by 50%.

3- OTHERS:-The Employer;

i. shall / shall not pay the workers in advance.

ii. shall / shall not pay the workers for the days not worked due to climatic conditions, disasters and similar reasons.
iii. shall take the measures of occupational health and safety of workers and all kinds of measures against occupational accidents and diseases.
iv. shall keep a record of the employee's payroll and the salary or wages paid to the employee.
v. shall employ each worker formally and render social security premium payments
vi. shall keep a record of timesheets for working days or hours of the employee
vii. shall comply with this contract and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and wellbeing of all employees any other person
viii. shall maintain a safe and healthy working environment
ix. shall not employ persons below the age of 18 years
x. shall not employ forced or compulsory labour
xi. shall treat all workers equally and fairly. Men and women will receive equal wages for equal work.

B. OBLIGATIONS OF WORKERS:

i. The person shall work as a casual worker with experience and professional knowledge in accordance with the mission and vision determined by the Employer.
ii. The worker accepted the conditions of this contract
iii. The working places to be indicated by the employer or his / her representative are the working place in accordance with the employer's decision within the boundaries of the sub project.
iv. Workers will start working on the date of signing this contract
v. Workers shall show due diligence and participate in OHS trainings in order to prevent work-related injury, accidents, damage to land, crops, agricultural vehicles and equipment.
vi. Workers shall not quit the job and work in another workplace without valid excuse as long as the subject of this contract continues by the employer.
vii. Workers shall comply with this contract and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person
viii. The provisions of the Labour Law shall apply to other matters not included in the contract (working hours, leaves etc.)

This contract is arranged in three / four copies and if one of the parties does not fulfil one of its obligations the …… courts / enforcement offices are authorized.

EMPLOYER'S:

Name (Surname & First Name): ……..

Date: …….

Signature: ……..

WORKER'S:

Name (Surname & First Name): ……..

Date: ……..

Signature: …….

ANNEX 4: SAMPLE WORKERS' CODE OF CONDUCT

1. Obligations:

All project workers (including sub-contractors) are obliged to comply with this Code of Conduct. Additional obligations may be added to respond to particular concerns of the local authorities or to project specific requirements. This Code of Conduct will apply and will be adopted throughout project implementation, for all project related works and all its sub projects.

2. Ownership

This Code of Conduct is written in plain English for ease of comprehension and may be translated into the appropriate local language, depending on the sub project location.

The employer or contractor will ensure that all workers and local Project-affected local communities are aware of this Code of Conduct and enable them to report any concerns or non-compliance.

3. Requirements for conduct

I, _____, acknowledge that preventing any misconduct as stipulated in this code of conduct, including Gender Bases Violence (GBV), child abuse/exploitation (CAE) are important. Any activity, which constitutes acts of gross misconduct violating this code of conduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the workstation or at the surrounding environment. Prosecution of those who commit any such misconduct will be pursued as appropriate.

I agree that while working on this project, I will:

1) Consent to security background check;
2) Treat women, children (persons under the age of 18) and persons with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, birth or other status;
3) Promote positive Interactions with community members. Not use language or behaviour towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
4) Not participate in sexual activity with children/learners (Minors- under the age of 18)—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence;
5) Prevent Sexual harassment. Not exchange money, employment, goods, or services for sex, with community members including sexual favours or other forms of humiliating, degrading or exploitative behaviour;

6) Not have sexual interactions with members of the communities surrounding the work place, worker's camps and fellow workers that are not agreed to with full consent by all parties involved in the sexual act (see definition of consent above). This includes relationships involving the withholding, 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;

7) Attend trainings related to HIV and AIDS, GBV, CAE, occupational health and any other relevant courses on safety as requested by my employer;

8) Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith;

9) Promote the Protection of children. With regard to children (under the age of 18):

    a. Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.

    b. 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.

    c. Refrain from physical punishment or discipline of children.

    d. 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.

    e. Comply with all relevant local legislation, including labour laws in relation to child labour.

10) Prevent Violence or exploitation and Promote avoidance of conflicts of interest such as through preferential treatment or favors to persons with financial, family, or personal connection.

11) Refrain from any form of theft for assets and facilities including from surrounding communities.

12) Remain in designated working area during working hours;

13) Refrain from possession and use of alcohol, illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during workings hours;

14) Comply with applicable health and safety requirements including wearing or using the prescribed personal protective equipment (PPE) at all times during work, preventing

avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)

15) Follow prescribed environmental, occupational health and safety standards including good Sanitation requirements, protection and proper use of property;

16) Channel grievances through the established grievance redress mechanism.

17) Follow and comply with applicable laws, rules, and regulations of the jurisdiction

18) Promote respect and compliance with reasonable work instructions,

I understand that the onus is on me to use common sense and avoid actions or behaviours that could be construed as misconduct or breach this code of conduct.

I acknowledge that I have received a copy, read and understand this Code of Conduct, and the implications have been explained with regard to sanctions on-going employment should I not comply. I understand that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

4. Application and Breach of Code of Conduct

All project staff and sub project workers who contravene the above clauses on code of conduct commit an offence and shall be liable to penalties for breach or non-compliance with the code of conduct, which is part of their contracts.

This code also applies to project staff and civil servants who will be involved in any aspect of project implementation and who have running appointment letters and this shall be applied by the PS, MGLSD together with the appropriate instruments as provided for in the standing orders for civil servants if such a clause was not included in the appointment letters. This is to be done prior to such staff taking up any roles on the project.

THE EMPLOYEE

Signed by: _____

Signature: _____

Date: _____

FOR THE EMPLOYER

Signed by: _____

Signature: _____

Date: _____

ANNEX 5: GRIEVANCE REGISTRATION FORM

<table>
<tr><td colspan="6">GROW / GRM……../……
(Location) (Reference No.)</td></tr>
<tr><td colspan="6">1. Complainant’s Information</td></tr>
<tr><td colspan="6">(This information must be provided. The identity of complainants will be kept confidential if they request so.)</td></tr>
<tr><td colspan="2">Names and Titles (Dr/Mr/Ms/Mrs)</td><td>Signatures</td><td>Positions/ Organizations (If any)</td><td>Addresses:

Contact Tel.</td><td>E-mail:</td></tr>
<tr><td colspan="2"></td><td></td><td></td><td colspan="2" rowspan="2"></td></tr>
<tr><td>Authorized Representative?</td><td>No ☐
Yes ☐</td><td colspan="2">If yes, Description of Group</td></tr>
<tr><td colspan="6">Please indicate how you prefer to be contacted (e-mail, mobile, letter, fax, verbal etc.):</td></tr>
<tr><td colspan="6">2. Brief Description of the problem:</td></tr>
<tr><td colspan="6">3. Description of the Complaint</td></tr>
<tr><td colspan="6">a) Why do you believe that the alleged harm results directly from the COVID-19 Emergency Project?</td></tr>
<tr><td colspan="6">b) Do you have any other supporting documents that you would like to share?</td></tr>
</table>

GROW / GRM……...……../…… (Location) (Reference No.)
4. Previous Efforts to Resolve the Complaint
(a)Have you raised your complaint with any other authorities? ☐ No ☐ Yes **If Yes** (Please, provide the following details): When?:_____ How and with whom the issues were raised?_____ _____
Please describe any response received from and/or any actions taken by the project level grievance mechanism. Please also explain why the response or actions taken are not satisfactory.
If No, Why?
(b) How do you wish to see the complaint resolved?

5. Name of the person who completed this form:	**Signature:**	**Date:**

ANNEX 6: GRIEVANCE RESOLUTION FORM

GROW /GRM ……...……/…… (Location) (Reference No.)			
1. Complainant's Information			
RESPONDENT DETAILS		**COMPLAINANT DETAILS**	
Full name		Full name	
Address:		Address:	
Phone No. (home/cell) IF ANY		Phone No. (home/cell) IF ANY	
Email:		Email:	
Date of complaint resolution		Location	
SUMMARY OF RESOULTION			
a) Brief description of Complaint:			
b) Brief description of Resolution:			

GROW /GRM …….....……/……..…… (Location) (Reference No.)			
SIGNATURES			
Chairperson Signature		**Complainant** Signature	
Name of Chairperson		Name of Complainant	
Date		Date	
Secretary Signature		**Witness** Signature	
Name of Secretary		Name of Complainant's Witness	
Date		Date	

ANNEX 7: SAMPLE OF A RISK ASSESSMENT TOOL

<table>
<tr><th>What are the hazards?</th><th>Who may be harmed and how?</th><th>What are you already doing?</th><th>What further action is necessary?</th><th colspan="3">How will you put the assessment into action?</th></tr>
<tr><td rowspan="2">Spot hazards by:
▪ Walking around the workplace;
▪ Asking workers what they think;
▪ Checking safety instructions;
▪ Contacting your supervisors

Don’t forget long-term hazard</td><td rowspan="2">Identify groups of people.
Remember:
▪ Some workers have particular needs;
▪ People who may not be in the workplace all the time;
▪ If you share your workplace think about how your work affects others;
▪ Members of the public Say how the hazard could cause harm</td><td rowspan="2">List what is already in place to reduce the likelihood of harm or make any harm less serious</td><td rowspan="2">You need to make sure that you have reduced risks “so far as is reasonably practicable”. An easy way of doing this is to compare what you are already doing with best practice. If there is a difference, list what needs to be done</td><td colspan="3">Remember to prioritize. Deal with those hazards that are high-risk and have serious consequences first.</td></tr>
<tr><td>Action by whom</td><td>Action by whom</td><td>Done</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
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<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td colspan="4">Review your assessment to make sure you are still improving, or at least not sliding back

If there is a significant change in your worksite, remember to check your risk assessment and where necessary, amend it</td><td colspan="3">Review Date:</td></tr>
<tr><td colspan="4">Assessment completed by:</td><td colspan="3">Signature:</td></tr>
</table>