United Nations Children’s Fund (UNICEF)

Social Protection and COVID19 Response Project (SPCRP)

(P173582)

Labor Management Procedures

(LMP)

22 February 2021
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1. INTRODUCTION

This Labor Management Procedure (LMP) has been prepared for the Social Protection and COVID-19 Response Project (SPCRP), which will ensure compliance with Environmental and Social Standard on Labor and Working Conditions (ESS2) of the World Bank’s Environmental and Social Framework (ESF) and the national legislation and regulations of the Government of Yemen. Accordingly, the purpose of this LMP is to facilitate the planning and implementation of the project by identifying the main labor requirements, the associated risks, and the procedures and resources necessary to address the project-related labor issues. The LMP sets out general guidance relevant to different forms of labor but also issues and concerns that relate to COVID-19 considerations.

The SPCRP builds on the ongoing IDA financed Emergency Crisis Response Project (ECRP) to deliver support to vulnerable Yemenis affected by conflict, COVID-19 and climate-related shocks. The project development objective is to provide cash transfers, temporary employment, and increased access to basic services and economic opportunities to vulnerable populations affected by COVID-19 and the ongoing conflict.

The Project will mainly target food insecure households and focus on interventions that are most effective at addressing food insecurity. Given the short-term food security needs, most of the Project funds are expected to be used to provide cash transfers (CTs) to vulnerable households. This includes unconditional cash transfers to Social Welfare Fund (SWF) beneficiaries as well as cash top ups and complementary services for SWF families that are most at risk of malnutrition. For vulnerable people that are able to work, the Project will continue to engage with communities to provide temporary employment opportunities to build valuable community assets, prioritizing community projects that contribute to food security, climate resilience and anchoring gender sensitive interventions. And in an effort to address food insecurity more sustainably, the Project will continue to provide economic opportunities to vulnerable populations through support to Small and Micro Enterprises (SMEs), with an emphasis on food market resilience and market-based mechanisms. Similar to the ECRP, Project interventions will include COVID-19-sensitive measures.

The ESPCRP will be implemented jointly by the United Nations Development Program (UNDP) and the United Nations Children’s Fund (UNICEF) in partnership with two national implementing partners – the Social Fund for Development (SFD) and the Public Works Projects (PWP) for their respective components. The project will include four main components, namely: (Component 1) Cash Transfers, including (a) Unconditional cash transfers to SWF beneficiaries; (b) Cash for Nutrition (CfN); (Component 2) Labor Intensive Works and Economic Opportunities, including (a) Cash for Work; (b) Community Assets; (c) Economic Opportunities and Food Market Resilience; (Component 3) Project Management, Monitoring, Evaluation and Capacity Building of National Institutions; and (Component 4) Continency Emergency Response.

The project will cover three main components for a duration of two years. Below are the components that will be managed by UNICEF:

**Component 1: Cash transfers**
- Subcomponent 1.1: Unconditional cash transfers to SWF beneficiaries
  - Implemented by UNICEF with gradual transition of some of the project components to SFD over the payment cycles.
  - Managed by UNICEF (Grant Recipient)

**Component 3: Project management, monitoring and evaluation**
- It includes direct and indirect costs and TPM
2. **OVERVIEW OF LABOR USE ON THE PROJECT**

ESS2 categorizes the workers into direct workers, contracted workers, community workers. The UCT Component will engage direct workers and contracted workers, for whom this Labor Management Procedure (LMP) will apply as defined in ESS2:

- **Direct workers:** The project will be managed and supervised by UNICEF, who will also be the implementing partner for part of the Project until such role is gradually transferred to the Social Fund for Development (SFD) within the framework of a Partnership Agreement. UNICEF and SFD staff are considered as direct workers. In addition, personal contracted directly by the UNICEF or SFD such as consultants are also considered as direct workers.

The **UNICEF** team allocated to the Project currently consists of the following personnel:

<table>
<thead>
<tr>
<th>#</th>
<th>Role</th>
<th>Duty station</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Senior Coordinator</td>
<td>Amman outpost (with frequent travels to Yemen)</td>
</tr>
<tr>
<td>2</td>
<td>Coordinator</td>
<td>Amman outpost (with frequent travels to Yemen)</td>
</tr>
<tr>
<td>3</td>
<td>Programme Manager</td>
<td>Sana’a Country Office</td>
</tr>
<tr>
<td>4</td>
<td>Operations Manager</td>
<td>Amman outpost (with travel to Yemen as needed)</td>
</tr>
<tr>
<td>5</td>
<td>Contracts Specialist</td>
<td>Amman outpost (with travel to Yemen as needed)</td>
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<tr>
<td>6</td>
<td>Programme Specialist</td>
<td>Aden Field Office</td>
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<tr>
<td>7</td>
<td>M&amp;E Specialist</td>
<td>Amman outpost (with travel to Yemen as needed)</td>
</tr>
<tr>
<td>8</td>
<td>Programme Specialist</td>
<td>Amman outpost (with travel to Yemen as needed)</td>
</tr>
<tr>
<td>9</td>
<td>MIS Manager</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>10</td>
<td>Cash Transfer Specialist (HCT)</td>
<td>Sana’a Country Office</td>
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<tr>
<td>11</td>
<td>Programme Officer (Case Management)</td>
<td>Amman outpost (with travel to Yemen as needed)</td>
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<tr>
<td>12</td>
<td>Field Outreach and Coordination</td>
<td>Sana’a Country Office</td>
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<tr>
<td>13</td>
<td>Communication Specialist</td>
<td>Sana’a Country Office</td>
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<tr>
<td>14-19</td>
<td>(Six) Programme Officers</td>
<td>Sana’a Country Office, Sana’a Field Office, Sa’ada Field Office, Ibb Field Office, Al Hudaydah Field Office</td>
</tr>
<tr>
<td>20</td>
<td>Finance Officer</td>
<td>Sana’a Country Office</td>
</tr>
<tr>
<td>21-27</td>
<td>(Seven) Field Monitoring Officers</td>
<td>Sana’a Field Office, Sa’ada Field Office, Ibb Field Office, Al Hudaydeh Field Office</td>
</tr>
<tr>
<td>28</td>
<td>Senior ICT Associate</td>
<td>Sana’a Country Office</td>
</tr>
<tr>
<td>29-30</td>
<td>Programme Assistants</td>
<td>Sana’a Field Office and Amman outpost</td>
</tr>
<tr>
<td>31</td>
<td>Fraud Analyst</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>32</td>
<td>Contracts Officer</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>33</td>
<td>Senior Java Enterprise Edition Developer</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>34</td>
<td>Quality Assurance Officer</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>35</td>
<td>(Two) Junior Java Enterprise Edition Developers</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>36</td>
<td>Database Administrator</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>37-38</td>
<td>(Two) Data Analytics</td>
<td>Amman outpost</td>
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<tr>
<td>39</td>
<td>Senior Supply &amp; Logistics Associate</td>
<td>Amman outpost</td>
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<tr>
<td>40</td>
<td>Senior Administrative Associate</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>41</td>
<td>Senior ICT Associate</td>
<td>Amman outpost</td>
</tr>
<tr>
<td>42</td>
<td>Programme Assistant</td>
<td>Amman outpost</td>
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</tbody>
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UNICEF-PMU is also recruiting a risk management, quality assurance and safeguarding expert while collaborating with other safeguarding focal point and experts with other Section in Yemen Country Office.
• **The SFD team**: This document will be updated with accurate information on the SFD direct workers after the signature of the partnership agreement between all parties and adjustment of SFD’s organizational structure to respond to the implementation partner role. SFD will establish a Project Management Unit (PMU) mirroring that of the UNICEF PMU with around 30 persons. The staff are expected to be on renewable contract and are not considered civil servants.

• **Contracted workers**: Contracted workers include the contractors (service provider organisations) who in turn employ workers/ labor (most of them contracted locally and temporarily to prepare and implement the payment cycles) based on daily wages to implement Project activities. The service provider organisations include the Facilitation Organisation, Payment Agencies, Third-Party Monitoring Organisation, Quality Implementation Support Services (fraud investigation) and Third-Party Human Resources Companies who contract grievance redressal personnel (call center agents and case management staff) as well as field consultants. Around 5,000 staff are contracted through these service providers to perform different tasks. Most of these workers are with the Facilitation Organisation and Payment Agencies. On average, as in Payment Cycle 9, the breakdown of contracted workers is as follows: facilitation (1,500), third-party monitoring (550), case management and case management associates (200), call center (70) and payment agents (2,300).

All contracted workers for the SPCRP will be recruited locally. Contractors will be encouraged to recruit local workers including at least one female worker at all payment sites and facilitation team to the most extent possible. Female workers will be assigned to tasks appropriate with their capabilities. All Contractors contracted by UNICEF or IPs with funds received from UNICEF will work towards compliance with all applicable international standards (including UNICEF and WB safeguarding frameworks) and national labor laws, rules and regulations relating to the temporary employment of national and international staff in connection with the Services, including, but not limited to, laws, rules and regulations associated with the payment of the employer’s portions of income tax, insurance, social security, health insurance, worker’s compensation, or other similar payments.

**Timing of Labor Requirements:**

Direct workers such as UNICEF and SFD staff will be on contract for this project for the duration of the Grant. Consultants will be hired to fulfil specific assignments. All contracted workers will be contracted for the duration of the assignments assigned to them within each payment cycle.

3. **BRIEF OVERVIEW OF YEMEN LABOR LEGISLATION: TERMS AND CONDITIONS**

The Republic of Yemen has drafted policies and established institutions and responsibilities for Labor management, joined international conventions and developed sector legislation and procedures. Contracted Workers are governed by the Local Labor Law policies. Key among these are:

**Gender**

• Yemen ratified the Convention on Elimination of all Forms of Discriminations Against Women (CEDAW) in 1984, and prepared a National Strategy for Women Development in 1997, which was updated in 2015. Implementation of CEDAW is delegated to relevant ministries and authorities (Decree 55/2009). Based on amendments proposed by the Women National Committee, 24 laws were amended to ensure building gender balance in accordance with the convention.
• The Labor Law (Law 5/1995) states that women are equal to men in all aspects without any discrimination, and that equality should be maintained between women and men workers in recruitment, promotion, wages, training, social insurance. It also regulates work time for pregnant women.

Labor

• The Labor Law regulates the rights and wages of workers, their protection, occupational health, and safety. In addition, the Social Insurance Law regulates retirement compensation.

Child Labor

• Yemen has ratified ILO Convention Number 138 on Minimum Age for Admission to Employment (Law 7/2001). The Convention establishes a minimum age for admission to employment.

• Yemen has also ratified the ILO Convention 182 on the Worst Forms of Child Labor. It refers to child labor as work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school, by obliging them to leave school prematurely; or by requiring them to attempt to combine school attendance with excessively long and heavy work.

3.1 Terms and Conditions

The local legislation above translates into the following Terms and Conditions for all Contracted Workers:

Employment Agreement:

• All employers are required to enter into an employment agreement in writing with their employees. The duration of a Yemeni worker’s contract will be specified as per Project needs, budget and timing.

Minors:

• The Yemen law considers a minor to be a person under the age of 15. Minors under the age of 15 are prohibited from engaging in any kind of employment. It shall be forbidden to employ a young person (any male or female person under 15 years of age). Article 7 of Ministerial Order No. 11 of 2013 (52), state that the minimum age for Hazardous Work is 18 years old.

All UNICEF contractors and the contractors of UNICEF IPs under this project will comply with all applicable international standards and national labor laws, rules and regulations relating to the employment of national and international staff in connection with the Services; and considers a minor to be a person under the age of 18 (not 15 as per Yemeni law).

Women’s employment:

• Women shall be equal with men in relation to all conditions of employment and employment rights, duties and relationships, without any discrimination. Women shall also be equal with men in employment, promotion, wages, training and rehabilitation and social insurance. The requirements of job or occupational specifications shall not be considered as discrimination.

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1 UNICEF Staff follows the UN/UNICEF internal Staff Rules, Policies, Procedures and Guidelines and does not follow local legislation.
• It shall be forbidden to assign a woman to overtime work as from the sixth month of her pregnancy and during the first six months following her return to work after maternity leave.

**Working Hours:**

• Official working hours shall not exceed eight hours per day or 48 hours per week. Weekly hours of work shall be distributed over six working days followed by one day of rest. No employee shall be required to work more than 6 (six) consecutive days a week (on a day that is normally a day off or has been agreed as a day off), without being provided with twenty-four consecutive hours of leave. Official working hours during the month of Ramadhan shall not exceed six hours per day or 36 hours per week.

• While this applies to full time contracts, different agreements may be in place based on the type of the employment contract like that on daily-basis or short-terms.

**Dismissal:**

• Employees have a right not to be dismissed unfairly, without cause. The Act provides a list of disciplinary measures that can be taken reasonably against an employee due to misconduct and which must ordinarily be exhausted before any dismissal. It shall be forbidden for an employer to terminate a contract of employment in the following cases:
  
  o During any of the worker's leave.
  
  o During the investigation of a dispute between the employer and the worker, provided that such investigation shall not exceed four months, unless the worker commits another violation which requires his dismissal.
  
  o During the worker’s detention by the competent authorities in connection with his work, pending a final decision in the matter.

**Wages and deductions:**

• The minimum wage payable to a worker shall not be less than the minimum wage paid by the state administration. The average daily minimum wage of a worker remunerated on the basis of production piece rates shall not be less than the daily minimum wage specified for the occupation or industry concerned. The daily wages of workers not paid on a monthly, weekly or daily basis shall be calculated on the basis of the average wages earned by their counterparts for days effectively worked for the same employer over the past year or during their period of service if less than one year.

• Employees may be fined for absenteeism from work during official working hours, such fine to be deducted from his/her wages and to be commensurate to the time absent from work. No other fines shall be imposed by the employer on account of absenteeism.

**Overtime Work:**

• Employees shall not be required to work overtime except unless this has been agreed in the employment agreement. Wages for overtime work shall be calculated according to the following rates:
  
  o One-and-a-half hours' basic wages per hour of overtime on normal working days.
  
  o Two hours' basic wages per hour of overtime at night, on the day of weekly rest, and on official holidays and leave, in addition to entitlement to standard wages for such holidays.

• Alternatively, the contract may specify that no monetary compensation will be provided but other type of compensations will apply such as time-off.
4. ASSESSMENT AND MITIGATION OF POTENTIAL LABOR RISKS

This section identifies the key labor risks for the Project and sets out the mitigation measures that will be adopted by the project to address specific risks to contracted workers, including those relating to COVID-19.

Security Risks

This specifically includes security risks associated with the ongoing conflict, such as threats to the personal safety of the workers due to fighting, airstrikes, shelling and landmines. The greatest security risks in many locations are the threat of physical violence for individuals involved in the implementation of the UCT Component such as payment agents’ personnel at payment sites or while traveling to payment locations. A series of mitigation measures will be in place to mitigate these security risks for Project Workers, which include:

- Implementing a clear mechanism to identify security threats to the project and to communicate changes in threat levels to the various parties involved in project implementation;
- Establishing communication and facilitation arrangements to secure the support of all relevant political and community actors at the national, governorate, and local levels to promote safe and politically neutral implementation of the project;
- Suspending project activities in areas where political and governance risks cannot be effectively managed;
- In areas with active conflict, establish outreach payment sites whose mobility enables to ensure that the cash process takes place only when and where it can be delivered in a safe manner, possibly with convoys;
- In areas impacted by landmines, (1) ensure updated and real-time mapping of roads and potentially affected areas, (2) ensure that all project workers are duly trained on the security measures to be implemented by outreach (mobile) payment teams working in conflict affected areas, with a focus on mine risk education, (3) ensure continual coordination between the Facilitation and payment service providers at field level.
- Applying a protocol to temporarily close payment sites in a coordinated manner in case of security threats and taking physical security measures such as the deployment of security personnel at payment site.
- Establishing clear implementation arrangements which emphasize the independence of decision making by any political and/or public-sector entity. These arrangements are communicated to all parties and stakeholders on a regular basis.

Gender Inequality, Gender-based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)

In Yemen, the stark gender gaps are influenced by and set within the context of conservative and strict gender norms. These gender gaps have a negative impact on females’ access to education, legal restrictions on mobility and decision-making, pose barriers to female participation in the labor force and in political life, and give females few opportunities for voice, paid work and entrepreneurial activity.

To the extent possible, the SPCRP will promote gender equality and the empowerment of women and seek to reduce gender inequalities in access to and control over resources and the benefits of development:

- The Project will ensure that both women and men are able to participate meaningfully and equitably, have equitable access to project resources, and receive comparable social and economic benefits.
- The Project will not discriminate against women or girls or reinforce gender-based discrimination and/or inequalities.
• The Project will ensure precautionary measures are in place to prevent potential exposure of beneficiaries, workers, and affected people to sexual exploitation and abuse; including security personnel. This will be done through training prior to the payment cycle, asking project staff to sign a Code of Conduct and real-time monitoring by UNICEF and SFD staff as third party. There is also a grievance mechanism whereby beneficiaries can anonymously file a complaint.

• The Project will ensure precautionary and control measures are in place to prevent potential exposure of beneficiaries, workers, and affected people to health and safety hazards. This will entail that SFD and all service provider develop an OHS plan which is gradually implemented and monitored.

The Project includes specific actions and design parameters to ensure the inclusion and participation of women. Such design parameters will ensure women are able to safely work for UNICEF contractors on project implementation and are provided an equal opportunity to benefit from the employment opportunities; and include:

• Requiring the presence of at least a female as part of the payment agent personnel at each payment site.

• In more conservative areas, establishing female-only payment sites operated by female payment staff.

• Gender-sensitive third-party monitoring arrangements, including female focus group discussions to provide more insight into the context and nature of these potential risks, as well as further ideas to increase the safety of female workers.

• Ensuring availability of a functional grievance redressal mechanism which can be used as reporting channel with specific referral pathways for GBV and SEA/SH.

• Conducting staff training on SEA/SH and GBV.

Child Labor
The dire humanitarian situation may lead families to adopt negative coping mechanisms, including child labor. To mitigate the risk of child labor, the Project will:

• Ensure the existence of contractual requirements on prevention of child labor, minimum age of 18 and age verification protocol for each implementing entities.

• Verify documentary evidence (passport, identity card or birth certificate) of all workers prior to involving them on activities of the project.

• Ensuring availability of a functional grievance redressal mechanism which can be used as reporting channel.

Natural Disasters/Risks
The effects of climate change are being felt across the world, and Yemen is not an exception. Strong heat waves are affecting different areas of the country, which is also prone to natural disasters such as heavy rains, floods and cyclones. These affect populations and result in possible health and safety risks for local workers making payments at payment sites and all other workers involved in monitoring, facilitation and all other relevant activities during the implementation of the project.

To mitigate these risks, the Project will:

• Diligently monitor the weather conditions and develop response plans to ensure the safety of service provider staff;

• Occurrence of heat waves occurring during payment cycles in a number of locations: adapted working hours at sites to avoid payment during times of high temperatures and increased capacity at sites.
Occurrence of floods: strengthened facilitation efforts to identify alternative payment locations which can be safely accessed by payment teams;

COVID-19 specific Occupational Health and Safety

In response to the global COVID-19 pandemic, UNICEF has embedded different protection measures across all stages of the Project to protect the project workers including:

- Ensuring that all workers have been trained and is fully aware of the COVID-19 related symptoms, transmission mechanisms and preventive measures.
- Ensure that Project workers maintain and enforce physical distancing of 1 to 2 meters between themselves and others (workers or beneficiaries);
- Ensure that all workers wear appropriate, protective gear including gloves and masks while performing their functions; and regularly wash their hands or clean them with hand sanitizer;
- Ensure that cashiers correctly handle bank notes and instruct beneficiaries to do the same. This includes:
  - Persons processing cash (cash handlers) should wash their hands with soap and water regularly. That is, at intervals during and after handling of banknotes and coins. Using a hand sanitizer of at least 60 percent alcohol concentration is also effective.
  - Cash handlers should avoid touching banknotes and then touching their eyes, nose, or mouth areas.
  - Cash handlers and the public should avoid "licking" their fingers to aid in the manual banknote counting/sorting process.
  - Always follow public health guidance on the safe ways to cough or sneeze.
- Rules should be strictly enforced to keep sick employees at home and away from the workplace.
- Allocate a separate enclosed space for isolation if a worker is found to be suspected of infection until that person is directed to a medical facility for treatment.
- Work surfaces that may be exposed to banknotes and coins should be disinfected regularly—at least daily and at greater frequency during the day for intensive operations.
- All public facing areas should be disinfected regularly, at the beginning, during, and the end of operations, without causing alarm to beneficiaries.
- Employees should minimize or avoid sharing common workplace items like pens, pencils, notepads, computers and telephones.
- Workplace training on COVID-19 risk factors will be conducted.
- Procedure to follow if a worker becomes sick (follow WHO guidelines), will be followed.

Other Occupational Health and Safety Concerns

In addition, implementing partners will be required under the Environmental and Social Management Plan (ESMP) to ensure workers will receive basic safety training and other preventive actions as provided in the Project’s Environmental and Social Management Framework (ESMF). Nevertheless, implementing partners will have to:

- Ensure that an appropriate level of management and resources are in place to comply with the occupational health and safety requirements,
• Provide visible commitment and leadership to occupational health and safety,
• Identify and evaluate risks and normalizes the activities (rules, instructions, and procedures),
• Analyze all incidents and accidents,
• Evaluate the indicators of OHS performance,
• Carry out the internal audits of OHS MS,
• Evaluate the OHS training requirements,
• Carry out the medical follow-up of the workers (such as emergency medical treatment on site, transportation to nearby hospitals) and cover medical insurance

5. GRIEVANCE MECHANISM (GM)

UNICEF is committed to address complaints through a dedicated Grievance Mechanism (GM) that supports beneficiaries, community members but also the service provider personnel and contracted workers to raise complaints and disagreements related to social, environmental and OHS impacts and standards. Grievances can be filed through a toll-free number 8003090 or field deployed staff equipped with a mobile application with online and offline capabilities. All grievances will be filed in the Project’s Management Information System (MIS) that allow to store and analyse grievances with high confidentiality and anonymity considerations.

UNICEF (and when applicable SFD) adhere to follow-up and respond immediately to any complaints raised by Project workers within an agreed time between 15-30 days. Workers complaints will be resolved with support of the service provider senior management for ensuring that a fair solution is reached. Urgent and immediate cases will be addressed immediately. The development or strengthening of a separate GRM for workers has been included in the Terms of Reference and Contract of each service provider and will be monitored by UNICEF.

The GM system established within the ECRP will continue to be utilised in the SPCRP, and further strengthened to better address Gender and GBV/SEA complaints. Through the GM, community members and service providers may make complaints on issues such as the following:

• Adverse social or environmental situation caused by the project;
• Access to UCT Component services – (for example if an intended UCT Component beneficiary has not been reached by the project.);
• Deviation in implementation or use of UCT Component inputs – (if implementing partners deliver services or pay to beneficiaries an amount less than the standard set by UNICEF for the project);
• Complaints on SEA related issues with ensuring complete confidentiality to protect impacted survivors due to culture norms in the country; and
• Any other concerns

The UCT GM will:
• Be responsive to callers, address and resolve their grievances;
• Serve as a channel to receive suggestions, and to increase community participation;
• Collect information to enhance management and improve implementation performance;
• Promote transparency and accountability on the modality and performance of the project;
• Deter fraud and corruption;
• Mandate services providers to sign a Code of Conduct; Include referral pathways to refer SEA survivors to appropriate support services;
• Mitigate environmental and social risks; and
• Build trust between citizens and UCT Component management.

GM Principles:
• Protect beneficiaries’ and stakeholders’ rights: beneficiaries and stakeholders have the right to make their voices heard. No retribution will be exacted for participation/use of the GM system, nor the escalation of grievances if needed,
• Transparency and Accountability: All complainants will be heard, taken seriously, and treated fairly.
• Timeliness: All complaints will be addressed as per protocols.
• Neutrality, Equity, and Non-Discrimination: All complaints will be treated with respect and equally regardless of the community groups and individuals, types, ages and gender.
• Accessibility: The GM will be clear and accessible to all segments of affected communities.
• Confidentiality: Information communicated through the GM is restricted to a limited number of people and is not disseminated more widely, offering protection and security to the complainant.

The entire grievance collection and redressal process is registered and recorded into the MIS. This enables the implementation of comprehensive quality assurance processes, with concrete protocols, to ensure that all grievances are recorded and handled in a proper manner. The grievances related to exploitation of female workers, including sexual harassment and abuse, GBV at the workplace and unfair treatment will be prioritized to take actions.

The number, frequency, topics of grievances and feedbacks will be analyzed and reported periodically to the related units and administrative level. Based on these detailed reports, the most frequently addressed issues are identified, and improvement activities are initiated.

All service providers will also be required to maintain and/or establish a grievance mechanism for their contracted workers. This will be included in the Term of Reference with the service provider and monitored.

6. OVERVIEW OF RESPONSIBILITIES

Project Management and Implementation
• For the UCT programme component, UNICEF is the Grant Recipient and Implementing Partner for the first payment cycle of the SPCR. In the following payment cycles, UNICEF will transfer the implementation of some of the Project components to SFD following a risk informed phased plan.

Monitoring and Enforcement of LMP Requirements
• As Grant Recipient for the UCT component, the UNICEF Project Management Unit’s Senior Coordinator will be responsible for cascading down within SFD implementation all LMP related protection and ensure their enforcement.

Service Providers/Contractors Management
• A comprehensive procurement and contracting process is conducted in close collaboration with UNICEF HQ (Legal, SD, DFAM) and MENARO. UNICEF conducted a market survey and pre-screening of service providers including a review of their standings against the Ineligibility List (IL) in UNGM that includes UN Security Council, World Bank, and UN sanction lists. The review was extended to board members of the respective institutions as well. Only those who passed the screening were invited to bid. A detailed review and cross checking of financial proposals and negotiations with service providers took place towards obtaining realistic and market rates. A security assessment was done by UNICEF security advisors with a focus on the payment agency internal security control mechanisms and procedures. Once SFD takes over implementation, SFD will be requested to use similar procedures.

• UNICEF has added WB safeguarding measures into all the Term of Reference and contracts with its service providers. Standard Operating Procedures for contract management and contract deviations are also being updated; and allocated dedicated contract managers for each of the service providers outlining the OHS and safeguarding measures outlined above including OHS (provision of PPE, training, insurance, emergency plan, etc.), working conditions (wage, rest entitlement, etc.), non-discrimination (female workers, etc.), code of conduct to prevent GBV, mitigations to child and forced labor (minimum age verification, etc.), worker GRM, and incident reporting,) and non-compliance remedies for potential violation of E&S provisions. During implementation, contract managers follow up with the service providers on a daily basis to monitor progress against plan, handle any bottlenecks hindering the implementation and ensure compliance with the contractual arrangements. In addition, calls are organised with the contract manager, contract specialist and contractors on a weekly basis to address and document any deviations from the contractual arrangements.

• The contracts with service providers have tight measures on beneficiary data protection, and robust provisions to prevent loss of funds by the Project in case of confirmed fraud or corruption. The measures to manage the contractor will be added in the contractor clauses in the bidding documents to ensure the legality. The clauses will include the mitigation measures for potential labor risks, the rights and wages of workers, terms and conditions of employment, insurance for workers and third party, gender rights, and grievance management procedures, safety requirements such as road safety and emergency plans including agreement with hospitals, contractor’s safety supervision staff and PPEs provision. According to the selection criteria, the ones who comply the best will be selected as contractors.

• During the implementation of the payment cycles, UNICEF and SFD will organize planned and unplanned visits to the locations where work is being performed. In these visits the progress achieved, health and safety-related, SEA and OHS issues, and child and forced labor employment status will be observed. The site reports will include the KPIs for contractor management and the outputs will be reflected in the monthly reports. In case of non-compliance by the contractors, corrective actions will be taken.

Engagement and management of project workers

• UNICEF (and later SFD) will be responsible for supervising and supporting the service providers which will be contracted to carry-out project specific tasks. The service providers are responsible for employing project workers to perform these tasks. UNICEF and SFD are responsible for:
  o Applying this labor management procedure to direct workers;
  o Updating this Procedure when necessary in the course of preparation, development and implementation of the Project;
- Maintaining records of recruitment and employment process of direct workers including signing CoC;
- Monitoring that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation;
- Monitoring training of the project workers on OHS; and,
- Developing and implementing workers’ grievance mechanism and address the grievance received from the direct, contracted and sub-contracted workers.

**Engagement and management of contractors/subcontractors**

- Service providers will be responsible for engagement and management of personnel (contracted workers), ensuring compliance with project protocols and providing labor instructions on safety and security. Service providers will be responsible for the following:
  - Comply with OHS mitigation measures included in the ESMF and this labor management procedure. These measures will apply to contracted and sub-contracted workers;
  - Maintain records of recruitment and employment process of contracted workers;
  - Clearly communicate job description and employment conditions to contracted workers including signing CoC;
  - Enforce CoC, including the timely reporting of incidents; and,
  - Have a system for regular review and reporting on labor, and occupational safety and health performance.

**Occupational health and safety (OHS)**

- With support from UNICEF and SFD, the service providers should assign an OHS Focal Point at central level who will be responsible for ensuring compliance with all OHS measures, including the establishing of a daily monitoring and reporting mechanism at field level which can enable the activation of immediate measures.

**Training of workers**

- With support from UNICEF and SFD, the service provider OHS Focal Point will be responsible for ensuring that all contracted workers are trained on OHS through formal training and equipped with the COVID-19 protective gear. The service provider will be responsible for providing UNICEF (and when applicable SFD) a report confirming the training dates, training venues, training outcomes, and workers’ confirmation of receipt of the COVID-19 protective gear.