



Republic of Zambia
MINISTRY OF HOME AFFAIRS AND INTERNAL SECURITY

**ZAMBIA REFUGEE AND HOST COMMUNITY PROJECT
(ZRHCP) (P503941)**

LABOUR MANAGEMENT PROCEDURES (LMP)

December 2024

LIST OF ABBREVIATIONS

AF	Additional Financing
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GRMC	Grievance Redress Mechanism Committee
HIV/AIDS	Human immunodeficiency virus / Acquired immune deficiency syndrome
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoFNP	Ministry of Finance and National Planning
MoHAIS	Ministry of Home Affairs and Internal Security
OHS	Occupational Health and Safety
PDO	Project Development Objective
PPE	Provision of Personal Protective Equipment's
PM	Project Manager
PIC	Project Implementation Committee
PIM	Project implementation manual
PMU	Project Management Unit
POs	Program Officers
SIs	Statutory Instruments
ZRHCP	Zambia Refugee and Host Community Project

GLOSSARY OF KEY TERMS

Labour

- **Complainant:** An individual, group, or organization that submits a verbal or written complaint.
- **Consultation:** The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
- **Engagement:** A process in which a company builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader “stakeholder engagement” strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.
- **Grievance Mechanism:** A process for receiving, evaluating, and addressing project-related complaints from citizens, stakeholders, and other affected communities.
- **Grievance/Complaint:** An expression of dissatisfaction that stems from real or perceived issues, typically referring to a specific source of concern and/or seeking a specific solution. For the purpose of this GRM, real and perceived impacts are treated equally and given the same due process. The term grievance and complaint are used interchangeably in this document.
- **Sexual abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In World Bank (WB) financed operations, sexual exploitation occurs when access to or benefit from Bank-financed goods, works, non-consulting services which covers both and is used to extract sexual gain.
- **Sexual exploitation and abuse (SEA), sexual harassment (SH):** SEA occurs against a beneficiary or member of the community. SH occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures for reporting each incidence.
- **Sexual harassment:** Any unwelcome sexual advances, requests for sexual favors, verbal or physical conduct or gestures of a sexual nature, or any other behavior of a sexual nature that might be reasonably expected or perceived to cause offense or humiliation to another when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment.
- **Stakeholder Engagement Plan:** A plan which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.
- **Stakeholders:** Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome,

either positively or negatively; workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g., local authorities, neighboring projects, and/or nongovernmental organizations, etc.

- **Survivor:** A survivor is a person who has experienced the SEA/SH incident in the context of this GM.

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1. INTRODUCTION

The Labor Management Procedures (LMP) for the Zambia Refugee and Host Community Project outline the principles and guidelines to be followed in managing labor and employment practices. The aim is to ensure fair treatment, non-discrimination, equal opportunity, and protection of the rights of all workers, including host community members and refugees.

The Zambia Refugees and Host Communities Project (P503941) aims to enhance self-sustainability and promote inclusion in refugee settlements and surrounding host communities. This project will use a whole-of-government approach as well as a paradigm shift from business as usual to focus on low-cost, high-impact interventions to effectively achieve its objectives. This project aims to be more inclusive by moving away from just providing for refugees in the settlements to extending the same to the host community and to turn the area into urban civilized societies that can be self-sustaining.

The Zambia Refugees and Host Communities comprises the following components:

Component 1: Strengthening the Enabling Environment (US\$ 8 Million est.)

Component 1a) US\$2 million. Implementation of Zambia's new refugee policy requires amendment to several existing Acts which cut across multiple government departments, including for example: immigration, education and agriculture. This sub-component will support the legal and technical resources required to facilitate the passage of new legislation. Lowering the costs of permits and removing the need for some of them altogether also form part of the reform agenda.

Component 1b) US\$6 million. Zambia is currently rolling out the issuance of new biometric National Registration Cards (NRCs) led by the Department of National Registration, Passports and Citizenship under MHAIS and intends to extend the scheme to refugees. The aim is to rationalize the existing permits and documents issued to refugees into one format and improve the application process. The documents will be stored digitally for ease of access with appropriate data protection safeguards. This sub-component will support the issuing of digital IDs to refugees, aligned with the national process underway as well as digitalize the Commissioner for Refugees. This component has technical assistance activities to ensure systems function efficient and effectively. Technical assistance, while beneficial, involves various occupational health and safety risks. These include ergonomic risks such as musculoskeletal disorders and eye strain from prolonged computer use, electrical hazards like electric shock and fires due to improper equipment handling. Technical assistance may involve the use of various chemicals, including cleaning agents, solvents, and lubricants that may cause health risks such as chemical exposure causing skin irritation and respiratory issues from cleaning activities. Physical injuries from mishandling tools which include cuts and lacerations, and crush injuries caused by Heavy or bulky equipment can cause crush injuries if not properly lifted or secured and psychosocial risks such as stress, burnout, and mental health problems which also pose significant hazards. Mitigation strategies include ergonomic interventions, regular equipment inspections, and proper training.

Component 2: Climate Smart Community Infrastructure (US\$12 Million est.)

Infrastructure deficits both in and around the Meheba Refugee Settlement are high. The aim of this component is to support priority infrastructure aligned with local planning priorities, i.e., the local area plan for Meheba and the host community by the Kalumbila District Council (under the Ministry of Local Government). This is likely to include a focus on economic infrastructure, i.e., trunk road upgrade and electrification. Depending on available resources other aspects of local planning would also be considered, e.g., expansion of boarding school accommodation, market upgrades and WASH facilities.

The development of infrastructure, particularly in a refugee settlement, presents unique Occupational Health and Safety (OHS) risks. These risks must be identified and mitigated to ensure the safety and well-being of workers and residents alike. OHS risks associated with activities under this component are presented below:

(a) Trunk Road Upgrade

Upgrading trunk roads is essential for improving connectivity and access within the Meheba Refugee Settlement. However, this activity comes with several OHS risks:

- **Heavy Machinery Operation:** The use of heavy machinery such as excavators, bulldozers, and asphalt pavers pose significant risks of physical injury. Operators must be trained and certified, and machinery should be regularly maintained to prevent accidents.
- **Excavation Hazards:** Excavation work can lead to cave-ins, falls, and contact with underground utilities. Proper excavation techniques, the use of protective systems, and thorough site assessments are necessary to mitigate these risks.
- **Traffic Management:** Road construction disrupts normal traffic flow, increasing the risk of accidents. Implementing comprehensive traffic management plans, including signage, barriers, and flaggers, is crucial to ensure the safety of both workers and road users.
- **Noise and Vibration:** Prolonged exposure to noise and vibration from construction machinery can lead to hearing loss and other health issues. Providing personal protective equipment (PPE) such as earplugs and ensuring regular breaks can help minimize these risks.

(b) Electrification Projects

Electrification is vital for improving living conditions and supporting economic activities. However, it involves several OHS risks:

- **Electrical Hazards:** Working with electricity can result in shocks, burns, or electrocution. Proper training, the use of insulated tools, and adherence to safety protocols are essential to prevent such incidents.

- Falls from Heights: Installing electrical infrastructure often requires working at heights. Fall protection measures such as harnesses, guardrails, and safety nets must be in place to protect workers.
- Manual Handling: Handling heavy electrical equipment and materials can lead to musculoskeletal injuries. Training workers on proper lifting techniques and providing mechanical aids can reduce these risks.
- Exposure to Hazardous Materials: Electrical work may involve exposure to hazardous materials such as asbestos or lead. Proper PPE and safe handling procedures are necessary to protect workers' health.

(c) Expansion of Boarding School Accommodation

Expanding boarding school accommodation is essential for providing adequate educational facilities. This involves several OHS risks:

- Construction-Related Injuries: General construction activities, such as carpentry, masonry, and roofing, can result in injuries from tools, equipment, or falls. Implementing strict safety protocols and providing PPE is crucial.
- Fire Hazards: The use of flammable materials and the presence of electrical systems increase the risk of fires. Ensuring proper storage of flammable materials and installation of fire detection and suppression systems is necessary.
- Ergonomic Risks: Repetitive tasks and improper workstation design can lead to ergonomic issues. Designing workstations to accommodate workers' needs and providing ergonomic training can mitigate these risks.

(d) Market Upgrades

Upgrading market facilities is crucial for supporting economic activities and improving living conditions. This involves several OHS risks:

- Structural Integrity: Ensuring the structural integrity of buildings is essential to prevent collapses and related injuries. Conducting thorough inspections and adhering to building codes can mitigate these risks.
- Sanitation and Hygiene: Poor sanitation and hygiene practices can lead to the spread of diseases. Implementing proper sanitation facilities and promoting hygiene practices are necessary to protect health.
- Slip, Trip, and Fall Hazards: Wet or uneven surfaces can cause slips, trips, and falls. Maintaining clean and even surfaces and providing proper lighting can reduce these risks.

(d) WASH Facilities

Improving WASH facilities is critical for ensuring access to clean water and sanitation. This involves several OHS risks:

- **Water-Borne Diseases:** Improper management of water sources can lead to water-borne diseases. Ensuring the proper treatment and safe storage of water is essential.
- **Chemical Hazards:** The use of chemicals for water treatment can pose health risks. Providing proper training and PPE for handling chemicals is necessary to protect workers.
- **Confined Spaces:** Working in confined spaces such as tanks or wells can pose risks of suffocation or exposure to hazardous gases. Implementing confined space entry procedures and providing proper ventilation is crucial

Component 3: Support to Agribusiness (US\$ 6 Million est.)

Refugees and host communities find it challenging to access livelihood opportunities to meet their basic needs in and around the Meheba Refugee Settlement. At the same time, the presence of large mining operations represents a good opportunity to support the development of agri-business along market-based principles. Barrick Mining for example, needs to feed a workforce of around 4000 persons daily, yet the limited availability of food in the local market prevents them from entering into purchase agreements with communities. Fertile soil, agricultural land, and water availability demonstrate the potential to expand production. Future preparation activities will explore what critical inputs are necessary to unlock agricultural potential and create sustainable businesses. This component technical assistance in agribusiness aims to enhance productivity and sustainability through modern agricultural techniques. Comprehensive Occupational Health and Safety (OHS) guidelines are essential for worker protection. Agribusiness involves a range of activities, each presenting various occupational health and safety (OHS) risks. Effective technical assistance is crucial to mitigate these risks and ensure the safety of workers. The associated risks include chemical exposure: Use of pesticides and fertilizers requires proper handling and PPE; Machinery Hazards: Safe operation and maintenance of heavy machinery are essential; ergonomic risks: repetitive motions and heavy lifting; biological hazards: protection from animal diseases and allergens is critical and environmental factors: Weather conditions and UV exposure and workers lacking OHS knowledge.

Component 4: Project Management (US\$ 4 Million est.)

The Ministry of Home Affairs and Internal Security will take the lead in the project and host a national Project Management Unit (PMU) and provide an oversight of the other components of the projects and a decentralized PMU at the Kalumbila District Council which will have clear terms of reference (TORs) for experts to implement the project. The project will require effective community outreach and communication early on so that the aims of the project are well understood by both refugees and host communities.

1.1. Project Location

Component 1 of the project will have nationwide coverage. Should additional funding be available, components 2 and 3 will be restricted to Kalumbila District hosting Meheba Refugee Settlement and the host community in North-Western Province. Kalumbila District, located in the North-

Western Province of Zambia, is an area that has seen significant industrial and commercial development, particularly in the mining sector. With such rapid growth comes a range of Occupational Health and Safety (OHS) risks that need to be identified and managed to ensure the well-being of workers and the surrounding community. Kalumbila District's environment contributes to OHS risks which include extreme weather conditions where workers are exposed to harsh weather conditions, including high temperatures and heavy rains, which can lead to heat stress or hypothermia and inadequate infrastructure with poor road conditions and limited access to healthcare facilities which can exacerbate the severity of injuries and delay medical treatment.

The Zambia Refugees and Host Communities Project is being prepared under the World Bank's Environment and Social Framework (ESF) which provides for the development of Labour Management Procedures (LMP) under Environmental and Social Standard 2 (ESS2) (Labour and Working Conditions).

The LMP sets out (i) how project workers will be managed in accordance with existing national labour laws, (ii) states terms and conditions of employment that will apply to project workers, including support for the principles of freedom of association and collective bargaining, (iii) provides for equal opportunities and non-discrimination of project workers, (iv) establishes minimum age for employment in preventing forced labour and child labour (v) measures to address occupational health and safety (OHS) of workers and (v) presents a worker grievance mechanism to raise workplace concerns. The provisions on the LMP will apply to direct workers, contracted workers, and primary supply workers engaged by the project. The project has also an environmental and social management framework (ESMF) in place which has detailed provisions on labour and OHS aspects of all the project components.

2. OVERVIEW OF LABOUR USE ON THE PROJECT

The Labour Management Procedures (LMP) apply to all project workers, whether skilled or unskilled. This includes full time, part-time, temporary, seasonal, or even migrant workers. According to ESS2 and ESS4, the LMP is applicable to project workers in the following four categories:

- i) **Direct workers** - people directly employed or engaged by the borrower (including the Project proponent and implementing agencies) to work specifically in relation to the Project.

These will be the Project Management Unit (PMU) staff and the Satellite Project Management Unit (SPIU) (refer to Table 1 for composition details) who will work specifically on the Project. The PMU will consist of at least five functional subunits that will operate across all sub-components of the Project. The PMU will be composed of the following members: a Project Coordinator (PC), responsible for the overall management and coordination of ZRHCP activities; a Legal Specialist; a Financial Management Specialist; a Monitoring and Evaluation Specialist; and a Communication and Stakeholder Specialist. Additionally, the Satellite Project Management Unit (SPMU) will be located within the Kalumbila town council. These staff members will also

take on additional responsibilities to support the implementation of ZRHCP. The qualifications, experience, and terms of reference for each position will be detailed in the Project Implementation Manual (PIM).

- ii) **Contracted workers** - These are workers that will be employed or engaged by the project Contractor and will include individuals drawn from communities in the project sites to support construction works for roads, and other common use facilities. These include bricklayers, carpenters, and manual workers, among others. These will be the workers who will be contracted to undertake specific tasks both skilled and unskilled for the project. Enterprises owned by women will be hired for infrastructure activities, via vocational training, capacity building activities, etc. Contracted workers will also consist of consultants hired to conduct technical studies and workers employed under sub-contracted companies for the project.
- (iii) **Primary supply workers** - these will be workers employed or engaged by the Project's primary suppliers of goods and materials for the core functions of the project (construction materials, advertising materials, IT equipment, etc.).

The implementation of the ZRHCP involves multiple sectors and actors that will be engaged in activities that include constructing/rehabilitating trunk roads, schools, bridges, mini-hospitals interpretative signage, and office/management infrastructure and supply of services and materials for the project components as outlined in the project appraisal document (PAD). Workers from primary suppliers will be required to adhere with the ESS2 and ESS4 and national labour law through formal labour engagements with the supplying entity regarding involvement with the implementation of activities under ZRHCP. The Project will not require primary supply workers throughout the life of the Project.

- (iv) **Community workers** - Members of the host community and refugees will be engaged in project activities in the project sites, including construction/rehabilitation, maintenance, and community services. Projects may include the use of community workers in several different circumstances, including where labour is provided in construction by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development.

Community workers will be engaged through the Satellite Project Management Unit (SPMU) established in the project areas. These workers will be recruited from local communities to perform sub-structural tasks requiring unskilled labor. When hiring community workers, the Project will adhere to non-discriminatory and equal opportunity criteria based on work needs, in compliance with national labor laws and Environmental and Social Standard 2 (ESS2): Labor and Working Conditions, as well as Environmental and Social Standard 4 (ESS4): Community Health and Safety requirements. The project will also follow the guidelines of the Ministry of Home Affairs and Internal Security when engaging project and migrant workers, including refugees and former refugees residing in the refugee settlement and host community of the Kalumbila District.

2.1. Characteristics of project Workers

Project activities involving construction works such as rehabilitation of the road, upgrading of education and health facilities and electrification of facilities will involve the engagement of workers based on the contractor's needs. The contractor will hire both skilled and unskilled workers as required. The contractor will also determine the proportion of full-time workers versus daily or hourly laborers based on operational requirements. The contracting company will have the responsibility and authority to select and hire appropriate staff in a manner consistent with anti-discrimination provisions as set out in the World Banks ESS2 and this LMP.

Contractors will be encouraged to maintain gender balance in their employment practices while adhering to the minimum age of employment, which is set at 15 years by the Employment Code Act, No. 3 of 2019 of the laws of Zambia. The proposed project will be guided by this Act.

The timing of labour requirements will correspond with to the schedule of work of the project activities to be implemented with a specified timeframe. This will further be informed by the structure of work that the Contractor will put in place.

Table 1 Description of Project Direct Workers

S/N	Category	Estimated Number	Responsibilities of Worker
1	Project Management Unit (PMU)	6	directly responsible for implementation of component one and overall project management
2	Satellite Project Management Unit (SPMU)	8	That PMU will have direct oversight of the implementation of components 2 and 3, in line with GRZ's decentralization strategy
3	Refugee Labour	Based contractor requirements.	TBA
4	Consultants	Based on the requirements of the consulting firms	TBA

3. ASSESMENT OF KEY POTENTIAL LABOUR RISKS

The primary labor risks associated with the project are assessed to involve potentially hazardous work or the use of hazardous materials at construction sites, as well as the risk of accidents. Additional activities will include conducting assessments and providing capacity training for PMU and beneficiaries. Consequently, there is a probable risk and impact on health, including exposure to infections and the transmission of sexually transmitted diseases due to an increase in commercial sex transactions, particularly around project sites and surrounding areas. All project workers (direct, contracted, primary suppliers, and community workers) are potentially at risk of being engaged under inadequate working conditions that do not comply with national labor laws and Environmental and Social Standard 2 (ESS2): Labor and Working Conditions requirements.

The following are the key labour risks identified:

3.1. Key Labour Risks

Key labour risks anticipated during Project implementation, but are not limited to:

- Incidences of Child labour and forced labour: There is a risk of child employment as community members below the age of sixteen years might be engaged to work for the project. Further there is also the risk of forced labour that may occur during project implementation. This may be particularly common among contracted workers that may be forced to work against their will until tasks are completed before being released.
- Gender Based Violence (GBV), sexual exploitation and abuse or sexual harassment (SEA/SH): in particular, women workers might be exposed and experience GBV and SEA/SH from the project male workers for instance during hiring and employment process, at work sites or outside worksite during field works in Project areas and surrounding areas. This risk may be experienced by workers across all labour categories. Further, inappropriate interactions between workers and surrounding communities may also result in increased incidences of GBV/SEA/SH.
- The risk of non-discrimination and deprivation of equal opportunity based on gender, religion, political affiliation, physical ability/disability is likely to arise for workers that will be engaged by the project. This may include workers being subjected to poor working conditions, workers having unclear terms of employment, delays in payment of workers' salaries, limited opportunities for promotion and training and other practices that do not align with ESS2 and national labour laws. Discrimination may arise during the recruitment processes and workers may also be deprived of the right to establish worker organizations for the purpose of collective bargaining.
- Community Health and safety: CHS risks are likely to be extensive for this project. CHS risks may include the following in addition to the detailed ones in the ESMF:

- traffic and road safety risks resulting from an expected significant increase in construction and poor standard of road rehabilitation and construction in rural areas leading to vehicle impacts with local community members and livestock
- unsafe and climate vulnerable infrastructure (including roads, buildings, bridges) leading to collapse during operational use and extreme weather events
- a lack of security at subproject sites where off grid energy solutions and telecommunications equipment are installed that could lead to theft of equipment, fuel and small-scale moveable infrastructure or cause accidents (impacts, electrocution etc.) due to community encroachment and inadvertent access.
- Infrastructure may create a dangerous environment to the community members especially vulnerable groups of Project sites and surrounding areas for example the dust from the construction site may be a health hazard and the construction equipment may cause harm to the community
- Contraction of Malaria and other communicable diseases to the local communities. Increase in theft and robbery of members of the local community
- inappropriate disposal of wastes of all types (wastewater, solid, hazardous) leading to the spread of infectious diseases among the community, increase in the number of local community members engaged in waste picking, and community health impacts from local water resource contamination and air pollution from burning of solid and hazardous waste etc.
- a lack of emergency response coordination at project sites leading to the uncontrolled spread of contaminants and fire etc.
- inappropriate storage of hazardous materials (other than fuel) resulting in inadvertent community exposure through water and air pollution
- Operational hazards during the operation of specific subprojects such as borrow pits.
- inadequate provision of drinking water and a risk of drowning associated with water related activities.
- inadequate building codes leading to life, fire and safety risks associated with infrastructure and irreversible damage to local ecosystem function.
- Increased OHS risks due to use of small size construction companies (given likely low OHS capacity and resources) and the use of community workers (given likely low OHS capacity and knowledge and inadequate OHS practices and procedures implemented during all phases of subproject activities leading to worker injury. Workers will be exposed

to a varying degree of physical, chemical, biological and other hazards throughout subproject construction and the operational phases. OHS risks include vehicle use in rural areas, use of pesticides, large scale fires, manual handling, slips, trips and falls, security and personal safety etc. The OHS risks during the construction phase are broader and cover a wider range of hazards including exposure to physical hazards (stress from long working periods, electricity, road travel, noise, vibration, trips, slips and falls, heat); chemical hazards (paints, cement, pesticides, hazardous materials etc.); biological hazards (viruses, infections including HIV and AIDS); other hazards (excavations, moving objects, asbestos etc.). There are also natural hazards such as storms, man - made hazards - fires, spills, asbestos, dealing with wastewater sludge for example from upgrading of schools and health facilities. There are also OHS risks such as worker drowning, being struck by lifting heavy equipment, harsh weather conditions and working in confined spaces during road works over and near water e.g., during rehabilitation of the Meheba bridge.

- Operational and Maintenance phase OHS: Occupational Health and Safety (OHS) is a critical aspect of infrastructure projects, particularly during the operations and maintenance phase. This phase involves the ongoing functioning of infrastructure after construction has been completed, encompassing regular maintenance, repairs, and upgrades. Ensuring the safety and well-being of workers during this phase is paramount to the project's sustained success and longevity. For infrastructure risks, OHS risks include exposure to electrocution due to maintenance works on the power lines and solar equipment.
- OHS risk and impacts include collision with moving equipment, exhaustion, trips, heat stroke, dehydration, falls, respiratory illnesses due to exposure to dust emissions, snakes, and insect bites (mosquitoes) and exposure to vehicular emissions electrical hazards, electromagnetic fields, exhaustion and working at height. Road construction and maintenance personnel, as well as landscaping workers maintaining vegetation in the rights-of-way, are exposed to various physical hazards. These include operating machinery, moving vehicles, exposure to weather elements, noise, dust emissions working in trenching, contact with overhead power lines, falls from machinery or structures, and the risk of falling objects.
- OHS risks to consultants who travel to perform project TA activities including exposure to traffic and road safety risks, stress and fatigue, including ergonomics of travelling long distances and health risks.
- Infrastructure may create a dangerous environment to the community members especially vulnerable groups of Project sites and surrounding areas for example the dust from the construction site may be a health hazard and the construction equipment may cause harm to the community. Project activities involving travel increases workers' exposure to accidents (car, motorbike, or bus) encompassing all workers that will undertake Project related travel such as monitoring, facilitation and coordination for assessment activities. Environmental degradation (vegetation degradation, open pit, water contamination, waste disposal, noise pollution, dust pollution and illegal quarrying).

- There are risks associated with labor influx, as the project may attract migrant or seasonal workers due to the nature of the construction jobs. Contractors might also bring in skilled labor, such as machine operators. Additionally, there is a risk of an increase in commercial sex transactions around project sites and surrounding areas, which may pose further challenges.

OHS risks in Infrastructure Development

The development of infrastructure, particularly in a refugee settlement, presents unique Occupational Health and Safety (OHS) risks. These risks must be identified and mitigated to ensure the safety and well-being of workers and residents alike.

Trunk Road Upgrade

Upgrading trunk roads is essential for improving connectivity and access within the Meheba Refugee Settlement. However, this activity comes with several OHS risks:

- **Heavy Machinery Operation:** The use of heavy machinery such as excavators, bulldozers, and asphalt pavers pose significant risks of physical injury. Operators must be trained and certified, and machinery should be regularly maintained to prevent accidents.
- **Excavation Hazards:** Excavation work can lead to cave-ins, falls, and contact with underground utilities. Proper excavation techniques, the use of protective systems, and thorough site assessments are necessary to mitigate these risks.
- **Traffic Management:** Road construction disrupts normal traffic flow, increasing the risk of accidents. Implementing comprehensive traffic management plans, including signage, barriers, and flaggers, is crucial to ensure the safety of both workers and road users.
- **Noise and Vibration:** Prolonged exposure to noise and vibration from construction machinery can lead to hearing loss and other health issues. Providing personal protective equipment (PPE) such as earplugs and ensuring regular breaks can help minimize these risks.

Electrification Projects

Electrification is vital for improving living conditions and supporting economic activities. However, it involves several OHS risks:

- **Electrical Hazards:** Working with electricity can result in shocks, burns, or electrocution. Proper training, the use of insulated tools, and adherence to safety protocols are essential to prevent such incidents.

- **Falls from Heights:** Installing electrical infrastructure often requires working at heights. Fall protection measures such as harnesses, guardrails, and safety nets must be in place to protect workers.
- **Manual Handling:** Handling heavy electrical equipment and materials can lead to musculoskeletal injuries. Training workers on proper lifting techniques and providing mechanical aids can reduce these risks.
- **Exposure to Hazardous Materials:** Electrical work may involve exposure to hazardous materials such as asbestos or lead. Proper PPE and safe handling procedures are necessary to protect workers' health.

Expansion of Boarding School Accommodation

Expanding boarding school accommodation is essential for providing adequate educational facilities. This involves several OHS risks:

- **Construction-Related Injuries:** General construction activities, such as carpentry, masonry, and roofing, can result in injuries from tools, equipment, or falls. Implementing strict safety protocols and providing PPE is crucial.
- **Fire Hazards:** The use of flammable materials and the presence of electrical systems increase the risk of fires. Ensuring proper storage of flammable materials and installation of fire detection and suppression systems is necessary.
- **Ergonomic Risks:** Repetitive tasks and improper workstation design can lead to ergonomic issues. Designing workstations to accommodate workers' needs and providing ergonomic training can mitigate these risks.

Market Upgrades

Upgrading market facilities is crucial for supporting economic activities and improving living conditions. This involves several OHS risks:

- **Structural Integrity:** Ensuring the structural integrity of buildings is essential to prevent collapses and related injuries. Conducting thorough inspections and adhering to building codes can mitigate these risks.
- **Sanitation and Hygiene:** Poor sanitation and hygiene practices can lead to the spread of diseases. Implementing proper sanitation facilities and promoting hygiene practices are necessary to protect health.
- **Slip, Trip, and Fall Hazards:** Wet or uneven surfaces can cause slips, trips, and falls. Maintaining clean and even surfaces and providing proper lighting can reduce these risks.

WASH Facilities

Improving WASH facilities is critical for ensuring access to clean water and sanitation. This involves several OHS risks:

- **Water-Borne Diseases:** Improper management of water sources can lead to water-borne diseases. Ensuring the proper treatment and safe storage of water is essential.
- **Chemical Hazards:** The use of chemicals for water treatment can pose health risks. Providing proper training and PPE for handling chemicals is necessary to protect workers.
- **Confined Spaces:** Working in confined spaces such as tanks or wells can pose risks of suffocation or exposure to hazardous gases. Implementing confined space entry procedures and providing proper ventilation is crucial.

Types of OHS Risks in Agribusiness

Chemical Exposure

Agricultural operations frequently involve the use of pesticides, herbicides, fertilizers, and other chemicals that can pose significant health risks if not handled properly. Technical assistance must include training on the proper use of personal protective equipment (PPE), safe handling procedures, and emergency response protocols to minimize exposure and ensure safe application.

Machinery and Equipment Hazards: The operation of tractors, harvesters, and other heavy machinery is integral to modern agribusiness. These machines, while increasing efficiency, also present significant safety hazards. Technical assistance must address the proper training in machinery operation, routine maintenance protocols, and safety measures to prevent accidents and injuries.

Ergonomic Risks: Agribusiness tasks often involve repetitive motions, heavy lifting, and prolonged periods of standing or bending, which can lead to musculoskeletal disorders. Ergonomic assessments and interventions, such as adjusted workstations and tools, are essential components of technical assistance to reduce the strain on workers' bodies and prevent long-term health issues.

Biological Hazards: Workers in agribusiness can be exposed to various biological hazards, including animal diseases, zoonotic infections, and allergens from plant materials. Technical assistance should include strategies for biosecurity, vaccination programs, and hygiene practices to protect workers from these risks.

Environmental Factors: Agricultural work is often performed outdoors, subjecting workers to extreme weather conditions, ultraviolet radiation, and other environmental hazards. Technical assistance should cover the implementation of shade structures, hydration protocols, and weather monitoring systems to mitigate these risks.

OHS risks associated with healthcare facilities

Health and safety hazards may affect health care providers, cleaning and maintenance personnel, and workers involved in waste management handling, treatment, and disposal. OHS hazards include the following:

- Exposure to infections and diseases
- Exposure to hazardous materials / waste
- Exposure to radiation
- Fire safety

3.2 Remedial Measures

The proposed remedial measures for all the above risks are:

- a) Enforcement of labour laws to ensure there is no incidences of child labour and forced labour by employing only persons who are fifteen years old and above and that no one is made to work against their will.
- b) Implementation and monitoring of an appropriately scaled OHS plan or Health Safety Management Plan (HSMP) for larger scaled construction projects like the road rehabilitation and Meheba bridge construction. For subproject ESMPs, OHS measures will be contained in them. Construction contracts will require construction company to prepare a C-ESMP which includes OHS measures. There is a need to ensure preparation of OHS measures for the O&M phases for schools, health care facilities, distribution/transmission lines, off-grid power generation and road rehabilitation. Comp 3 agribusiness investments (entities) need to have OHS measures in place. The OHS plans will incorporate hazard identification, risk assessment, communication and training, implementation and monitoring, standards and requirements of PPE and other more technical measures such as method statements, permits to work, etc.
- c) Specific OHS measures (including training) when using community workers will be developed and implemented reflective of these types of works.
- d) In line with ESS 2 on Labor and Working Conditions, ensure that suppliers adhere to fair labor practices, including the prohibition of child labor and forced labor, and provide safe and healthy working conditions.
- e) Ensuring that working conditions are maintained in line with ESS2 and local labor legislation including clearly stipulating work hours, ensuring issuance of pay slips, healthcare cover, valid contract, maintaining a code of conduct, to ensure timely payment of worker salaries and general enforcement of national labour laws and ESS 2 requirements.

- f) Conducting trainings and sensitization of community and project workers on occupational health and safety.
- g) Ensuring no one is discriminated and deprived of the opportunity to work on the Project based on gender, religion, political affiliation, physical ability/disability.
- h) Implementing the Grievance Redress Mechanism (GRM) to address Project related complaints and specific guidance on handling GBV cases. This will be done via sensitization on the worker GRM and through ensuring that there is a survivor centered approach and a referral pathway.

4. BRIEF OVERVIEW OF LABOUR LEGISLATION

This section outlines the key aspects of national labor legislation concerning terms and conditions of work and explains how national laws apply to different categories of workers, with a particular emphasis on legislation related to employment terms and conditions.

The Government of Zambia has enacted labour laws which regulate principles/concepts of employment in Zambia and govern the employer and employee relationship. The LMP for ZRHCP is informed by articles contained in relevant national labor laws that include the Employment Code Act No. 3 of 2019, the Industrial and Labour Relations Act, Chapter 269 of the Laws of Zambia, the Occupational Health, and Safety Act No. 36 of 2010, Public Health Act, No. 21 and 22 of 2020, National Health Insurance Act No. 2 of 2018 and the Public Health Act Chapter 295 of the Laws of Zambia as the main legal instruments.

Zambia has also ratified ILOs ten fundamental Conventions including:

- C029 Forced Labour
- C087 Freedom of Association and Protection of the Right to Organise
- C098 Right to Organise and Collective Bargaining
- C100 Equal Remuneration
- C105 Abolition of Forced Labour
- C111 Discrimination (Employment and Occupation)
- C138 Minimum Age
- C155 Occupational Safety and Health
- C182 Worst Forms of Child Labour
- C187 Promotional Framework for Occupational Safety and Health

The fundamental requirements of employment laws are largely consistent with ESS2 and ESS4. The national labor directives cover aspects such as working hours, benefits (if any), job descriptions, leave entitlements, wage protection, termination of employment, grievance procedures, and codes of conduct, as well as the prohibition of child or young person labor. Additionally, the legislation specifies occupational health and safety standards, categories of

workers (including protected, non-protected, and casual workers), and provisions for national health coverage. The Employment Code Act, No. 3 of 2019, of the laws of Zambia, establishes the minimum contractual age at 15 years. The PMU will ensure that national Labour legislation together with ESS2 and ESS4 requirements are followed to guide the project and protect both the workers and employers. Below is a summary of the guiding national laws.

Table 2 Summary of Zambian legal documents guiding the LMP

S/N	Legislation	Description	Project Activity
1.	The Employment Code Act No. 3 of 2019	The Act provides regulations and penalties related to employment standards in Zambia. It prescribes the minimum employment benefits employers should follow to regulate employment contracts, protect wages, regulate the employment of children and young persons, provide for employee welfare, establish employment agencies, handle employment disputes, and outline inspection powers. The Act places an obligation on the employer to promote equal opportunity in employment and eliminate discrimination in an undertaking. It further prescribes additional protection for workers against dismissal by frameworks that outline procedures for dismissing an employee	Increase in number of workers may result in unfair treatment forced and child labor. The Act ensures employment standards are provided to all categories of recruited workers. The project will also enforce the prohibition of child and forced labor throughout implementation of project activities. Further, workers will be protected by termination notices which comply with the requirements set by chapter 268 Section 20 of the Employment Act.
2.	The Public Health Act Chapter 295 of the Laws of Zambia	Provides for the prevention and suppression of diseases and generally regulates all matters connected with public health in Zambia. The Act regulates that workers will be safe and protected at workplace the provisions that include First Aid, sanitation and hygiene.	There is a risk of spread of disease during renovation and construction activities, ZRHCP will be guided by the Act to ensure that all workplace sites/premises protect all workers against a condition or circumstance that might generate, promote, or transmit disease to workers across of project activities.

S/N	Legislation	Description	Project Activity
4.	Public Health Act, issued two Statutory Instruments (SI), No. 21 and 22 of 2020, to respond to the COVID-19 pandemic	Two statutory instruments (SIs) have been issued in response to the COVID-19 pandemic. The first, SI No. 21 of 2020, declared the Coronavirus Disease 2019 as a notifiable infectious disease in line with Section 9 of the Public Health Act. The second, SI No. 22 of 2020, set out measures aimed at controlling the spread of COVID-19. This includes mandatory quarantine measures for patients and those suspected of suffering from COVID-19. The two SIs facilitate the management and Control of COVID-19 including workplaces.	In the event that there is an outbreak of Covid-19, the project will be guided by measures issued by the Ministry of Health (MoH) to respond to the COVID -19 pandemic. The PMU will ensure that all categories of workers comply with the measures MoH has put in place (such as sanitizers, PPEs to the workers).
3	Occupational Health and Safety Act No. 36 of 2010	The Act provides for the establishment of health and safety committees at workplaces and for the health, safety and welfare of persons at work; provide for the duties of manufacturers, importers and suppliers of articles, devices, items and substances for use at work; provide for the protection of persons, other than persons at work, against risks to health or safety arising from, or in connection with, the activities of persons at work;	To safeguard workers from risks such as accidents and hazards, ZRHCP will implement safety measures for all project workers. This includes providing the correct tools for their tasks, establishing a health and safety committee, offering appropriate health and safety training, and clearly labeling all hazardous areas and materials.
5.	Industrial and Labour Relations Act, Chapter 269 of the Laws of Zambia	The Act provides for the conduct of industrial relations, the establishment of workers/employers' organisation, their registration and administration, and the settlement of disputes and consultative machinery.	To ensure worker complaints are heard, the project will support the freedom of workers to belong to a trade union.
6.	National Health Insurance Act No. 2 of 2018	The Act provides for sound financing for the national health system; It provides for the creation of a health protection scheme in which financial risk is equitably shared and special consideration is given to vulnerable groups.	Workers are always at risk of illness or injury. To mitigate this, all categories of workers will be provided access to primary healthcare. The Project will adhere to the provisions of the law to ensure health insurance cover for workers who will be employed under the project.

S/N	Legislation	Description	Project Activity
7	Anti-Gender Based Violence Act No1 of 2011	The Act provides for the protection of victims of gender-based violence; constitutes the Anti-Gender-Based Violence Committee; and establishes the Anti-Gender-Based Violence Fund. It responds to the vice of GBV in Zambia.	Due to the project's activities, there is a risk of GBV/SEA/SH. The project will be guided by the Act, which provides a comprehensive framework for the protection and support of victims and survivors of gender-based violence, as well as the prosecution of perpetrators. The Act also established a gender-based violence fund to assist victims and survivors, including providing shelter, emergency monetary relief, and addressing harmful traditional practices.

5. OCCUPATIONAL HEALTH AND SAFETY

In accordance with the Occupational Health and Safety (OHS) Act No. 36 of 2010 (applies to all places of work), the Public Health Act Chapter 295 of the Laws of Zambia and annex 3, it is the duty of the employer to ensure and provide:

- The establishment of health and safety committees where there are ten or more workers at workplaces
- Worker welfare provisions such as safe drinking water, shelter, and rest areas etc.
- The protection of persons, other than persons at work, against risks to human health or safety arising from, or in connection with, the activities of persons at work; including adequate first-aid arrangements to deal with emergencies and accidents
- Matters connected with, or incidental to, the foregoing.
- Place and maintain an employee in an occupational environment adapted to the employee's physical, physiological, and psychological ability.
- And maintain adequate supply of drinking water, and separate eating & resting areas free from poisonous or injurious substances.
- To prepare a health and safety policy concerning the protection of the health and safety of the employees, including a description of the organization and arrangements for carrying out reviews to that policy. Implementation and monitoring of an appropriately scaled OHS measures in ESMPs/CESMPs or Health Safety Management Plan (HSMP) for larger scaled construction projects like road rehabilitation and construction of Meheba bridge. The OHS plans and measures will incorporate hazard identification, risk assessment, communication and training, implementation and monitoring, standards and requirements of PPE and other more technical measures such as method statements, permits to work, etc.
- Ensuring that working conditions are maintained in line with ESS2 and local labor legislation including clearly stipulating work hours, ensuring issuance of pay slips, healthcare cover, valid contract, maintaining a code of conduct, to ensure timely payment of worker salaries and general enforcement of national labour laws and ESS 2 requirements.
- Conducting trainings and sensitization of community and project workers on occupational health and safety.
- Ensuring no one is discriminated and deprived of the opportunity to work on the Project based on gender, religion, political affiliation, physical ability/disability.
- Implementing the Grievance Redress Mechanism (GRM) to address Project related complaints and specific guidance on handling GBV cases. This will be done via sensitization on the worker GRM and through ensuring that there is a survivor centered approach and a referral pathway.

Table 3 Brief overview of Labour Legislation: Occupational Health and Safety

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
1.	Occupational Health and Safety Act, No. 36 of 2010	<p>Duties of the employer which include:</p> <ul style="list-style-type: none"> - Provides for the establishment of health and safety committees at workplaces and for the health, safety and welfare of persons at work; and - Provides for the protection of persons, other than persons at work, against risks to health or safety arising from, or in connection with, the activities of persons at work. - To place and maintain an employee in an occupational environment adapted to the employee’s physical, physiological and psychological ability. - To provide plant and systems of work that are safe and without any risks to human health and maintain them in that condition. - To provide information, instruction, training and supervision to ensure the safety and health of employees at the workplace. - To control the workplace in a condition that is safe and without risk to the health and safety of employees using it. - To inform and consult with health and safety representatives on workplace health and safety matters. - To provide measures to deal with emergencies and accidents, including first-aid arrangements. - To provide, at the employer’s expense, PPE to be used in the workplace by employees. <p>Duties of employees, which include:</p> <ul style="list-style-type: none"> - To take care of the employee’s own health and safety and that of other persons who may be affected by the employee’s acts or omissions at the workplace. - Not to operate any machine or engage in a process which is unsafe or is an imminent risk to the employee’s own health or safety and that of others. - To cooperate with the employer or any other person in relation to any duty imposed on the employer or that other person. - To inform the employer, OHS committee or health and safety representative of any item, device, article, plant or substance, 	<ul style="list-style-type: none"> - Project workers will constitute the health and safety committees formed in the project sites. - The Project sites will be close to communities who may be affected by activities on the project. - The project will place duty of care towards the health, safety and welfare of persons at work. - The project to ensure employees’ duty of care towards their own health, safety and welfare and that of others.

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
		<p>condition or aspect of the workplace that may be dangerous to employees' health and safety.</p> <ul style="list-style-type: none"> - The protection of persons, other than persons at work, against risks to health or safety arising from, or in connection with, the activities of persons at work. - Duties of designers, manufacturers, suppliers and importers of articles, devices, items and substances for use at work. - Duties of architects and engineers. 	
2.	The Factories Act, Cap 441 of 1967	<p>The Factories Act:</p> <ul style="list-style-type: none"> - Makes further and better provision for the regulation of the conditions of employment in factories and other places as regards the safety, health and welfare of persons employed therein; and - Provides for the safety, examination and inspection of certain plant and machinery. - As a minimum, the Act provides for: <ul style="list-style-type: none"> - Maintenance of workplaces in a clean state. - Prohibition of overcrowding of workplaces, while work is carried on, to avoid risk of injury to employed persons. - Effective and suitable ventilation of workplaces by natural or artificial means. - Effective and suitable lighting of every workplace by natural or artificial means. - Provision of sufficient and suitable sanitary conveniences for persons employed in a workplace. - Secure fencing of moving parts and dangerous parts of machinery including flywheels, head and tail race of every water wheel and water turbine, every part of any electric generator, motor or rotary converter, parts of transmission machinery etc. - Secure covering or fencing of vessels, structures, sumps or pits containing any scalding, corrosive or poisonous liquid, or any molten metal into which a person might fall. - Training and supervision of inexperienced workers. 	<ul style="list-style-type: none"> - The Project site will be subject to the Factories Act requirements with regards to the health and welfare of the Project workers. - Equipment and other machinery that will be used by Project workers for various tasks, may be subject to the safety examination and inspection. - The project to ensure recording, notification, reporting and investigation of occupational accidents, dangerous occurrences and diseases. -

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
		<ul style="list-style-type: none"> - Sound construction and maintenance of floors, steps, stairs, passages and gangways. - Safe means of access to and egress from every place at which any person has at any time to work. - Precautions in places (including confined spaces) where dangerous fumes are liable to be present. - Precautions with respect to works likely to generate explosive or inflammable dust, gas, vapour or substance. - Prevention and fighting of fire. - Means of escape and warning in case of fire. - Testing and examination of means for giving fire warning. - Carrying out of fire drills. - The construction specifications, use, maintenance, safety, examination and inspection of lifting machinery. - Register of lifting machinery. - The construction specifications, use, maintenance, safety, examination and inspection of pressure vessels including steam boilers, steam receivers and containers and air receivers. - The welfare of employed persons including provision of <ul style="list-style-type: none"> - Adequate supply of wholesome drinking water. - Washing facilities, supply of soap and suitable means of cleaning or drying. - Accommodation for clothing and change rooms. - Facilities for sitting when taking breaks. - First-aid. - Removal of and prevention of inhalation of dust or fumes. - Provision, use and maintenance of suitable PPE. - Limits on lifting excessive weights likely to cause injury. - Requirement of certificates of fitness in respect of young persons to protect them from work that may be prejudicial to their health. - Notification of accidents, dangerous occurrences and occupational diseases. 	

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
		<ul style="list-style-type: none"> - Posting of abstract of the Act, regulations and notices in prominent positions in the workplace. - Keeping a register in which should be entered or attached 	
3.	<p>The Construction (Safety and Health) Regulations</p> <p>Note: These are subsidiary regulations under the Factories Act, Cap 441 of the Laws of Zambia</p>	<p>As a minimum, the Regulations provide for:</p> <ul style="list-style-type: none"> • Sending notice of commencement of work to the Labour Commissioner in respect of construction works that will not be completed within a period of less than six weeks. • Provision of scaffolds and safe means of access at construction sites. • Construction, safe erection, support, use, maintenance, inspection and dismantling of scaffolds. • Accountabilities in cases where scaffolds are used by workmen belonging to different employers. • Construction specifications, erection, use and maintenance of working platforms. • Construction, use and maintenance of gangways and runs. • Construction, use and maintenance of ladders and stepladders. • Communication ladders. • Lighting of workplaces. • Construction, erection, support, anchoring and stability, use, maintenance and dismantling of lifting machinery at construction sites. • Drums, pulleys and brakes and controls of lifting machinery. • Marking of safe working load on lifting machinery. • Precautions when using lifting machinery. • Testing, examination and inspection of lifting machinery. • Training and competence of lifting machinery operators. 	<p>The regulations set minimum OHS requirements to be met by the project with respect to:</p> <ul style="list-style-type: none"> • Submission of notices of commencement of construction works. • Construction, use, maintenance and inspection of scaffolds. • Safety of working platforms and gangways. • Construction, use, maintenance, inspection and testing of lifting machinery. • Safety of excavations. • Safety of demolition works. • Safety of on-site transportation systems and vehicles. • Health and welfare facilities. • Personal protective equipment. • Duties of contractors and employers of workers. • Duties of employed persons. • Recording, notification, reporting and investigation of occupational accidents and dangerous occurrences on construction sites.

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
		<ul style="list-style-type: none"> • Reports and records of tests, examinations and inspections of lifting machinery. • Inspection, fencing and safeguarding of excavations. • Means of entry into and exit from excavations, shafts and tunnels. • Safe handling and use of explosives. • Provision of safety measures and competent supervision before and during demolition works. • Use, maintenance and loading of vehicular transport at construction sites. • First-aid provisions. • Wholesome drinking water. • Convenient and suitable shelters for taking refuge during interruptions owing to bad weather. • Convenient and suitable accommodation for changing clothes. • Convenient and suitable accommodation for taking meals. • Sufficient and suitable sanitary conveniences. • Provision of suitable PPE including hard hats. • Securing and maintaining the adequate ventilation of every working place in any excavation, pit, hole, adit, tunnel, shaft, caisson, or other enclosed space. • Prevention of drowning. • Provision of safety nets, sheets and belts. • Secure fencing and guarding of parts of machinery that may pose danger to any person at a construction site. • Duty of contractors and employers of workers undertaking any construction work to comply with the regulations. 	

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
4.	<p>The Factories (Electricity) Regulations</p> <p>Note: These are subsidiary regulations under the Factories Act, Cap 441 of the Laws of Zambia</p>	<p>As a minimum, the Regulations provide for:</p> <ul style="list-style-type: none"> • Safety of electrical installations in respect of their size and power for the work they are required to do. • Insulation of electrical conductors. • Placement, protection and arrangement of electrical control gear (e.g. switches, switch fuses, circuit-breakers) in a safe manner. • Construction specifications for electrical joints. • Earthing of bare neutral conductors. • Arrangement, enclosure and placing of switchboards. • Protection of high and extra high-pressure apparatus. • Precautions against accidental charging of metal other than conductors. • Provision of insulating stands or screens. • Provision and use of portable insulating devices. • Protection of conductors and apparatus against exposure to the elements. • Adequate lighting of all parts of undertaking where apparatus is placed. • Restricting operation of apparatus to authorized personnel with relevant technical knowledge and experience. • Construction, control, maintenance, safety and security of substations. • Safe means of access to substations. • Display of printed instructions as to treatment of persons suffering from electric shock. 	<p>The project involves electricity installation activities for both on grid and off grid.</p> <p>The regulations set minimum OHS requirements to be met by the project with respect to:</p> <ul style="list-style-type: none"> • Safety of electrical installations. • Placement, arrangement and maintenance of switchboards. • Control of substations.

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
5.	<p>The First-Aid Boxes Regulations</p> <p>Note: These are subsidiary regulations under the Factories Act, Cap 441 of the Laws of Zambia</p>	<p>As a minimum, the Regulations provide for:</p> <ul style="list-style-type: none"> • Specifications of what is to be contained in a first-aid box, case or cupboard. • Standards of all materials for dressings contained in any first-aid box, case or cupboard. • Specifications of conditions in which wound dressings and eye ointment are to be kept. 	<p>The regulations set minimum requirements to be met by the organisation with regards to contents of first-aid boxes or cases/cupboards</p>
6.	<p>The Factories (First Aid) (Prescribed Standard of Training) Regulations</p> <p>Note: These are subsidiary regulations under the Factories Act, Cap 441 of the Laws of Zambia</p>	<p>As a minimum, the Regulations deem one not to be trained in first aid unless:</p> <ul style="list-style-type: none"> • He or she is a fully registered nurse. • He or she is a fully registered medical assistant. • He or she is a nurse trained to a standard laid down by the Ministry of Health. • He or she is the holder of a certificate in first aid issued within the immediately preceding period of three years by or is otherwise recognized as being trained in first-aid treatment by a recognized first-aid training organization. <p>The Regulations recognize the following as first-aid training organizations in Zambia:</p> <ul style="list-style-type: none"> • The Council of St. John in Zambia. • Zambia Red Cross Society. 	<p>The regulations set minimum requirements to be met by the project with regards to the standard of training to be given to its first aiders.</p>
7.	<p>The Workers' Compensation Act</p>	<p>As a minimum, the Act provides for:</p> <ul style="list-style-type: none"> • Establishment and application of a workers' compensation fund. • Determination of the civil liability of an employer where any injury is caused, or disease is contracted by a worker in the course of employment. • Requirements of certificates of fitness for persons employed as miners. 	<p>The Act sets minimum requirements relating to:</p> <ul style="list-style-type: none"> • Right to compensation. • Liability for compensation and amount of compensation. • Procedure for obtaining compensation. • Medical aid for injured workers. • Payment of assessment fees by employers.

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
		<ul style="list-style-type: none"> • Initial, periodical and exit medical examinations of employed persons to determine their fitness for work and/or health status. • Conditions under which an employed person has the right to compensation as a result of an accident or disease arising out of and in the course of employment. • Determination of awards of compensation. • Circumstances that preclude compensation. • Prohibition of termination of contract of employment for a disabled worker without consent of Commissioner - Workers' Compensation. • Instructions on giving notice of an accident or incidence of a disease-causing disablement or death of a worker. • Conveyancing of injured workers, medical aid and medical expenses. • Payment of assessments by employers 	
8.	National Council for Construction Act No. 10 of 2020	<p>The National Council for Construction Act No. 10 of 2020:</p> <ul style="list-style-type: none"> - Enhances contractor capacity development and technical compliance in the construction industry; and - Provides for a complaints and appeals procedure. 	The construction of the transmission line, and complaints and appeals with regards to the construction activities on the Project may arise and will adhere to the requirements of the Act.
9.	Public Health Act Cap 295 of 1930	The Public Health Act Cap 295 provides for the prevention and suppression of diseases and generally to regulate all matters connected with public health in Zambia.	The Project will employ several workers at different sites and within proximity to communities throughout the Project construction phase. The risk of spread of communicable diseases would therefore be high, of which their prevention would be subject to the provisions of the Act.

Table 4: World Bank Occupational Health and Safety Framework

S/N	WORLD BANK INSTRUMENT	OBJECTIVE	PROVISIONS
1.	General Environmental, Health and Safety Guidelines (EHSGs)	<p>The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors.</p> <p>The General EHSGs seek to provide for the protection of the environment and the health and safety of workers and communities which might be impacted by developmental activities.</p>	<p>The applicability of the EHS Guidelines should be tailored to the hazards and risks established for each project on the basis of the results of an environmental assessment in which site-specific variables, such as host country context, assimilative capacity of the environment, and other project factors, are taken into account.</p> <p>When host country regulations differ from the levels and measures presented in the EHS Guidelines, projects are expected to achieve whichever is more stringent. If less stringent levels or measures than those provided in these EHS Guidelines are appropriate, in view of specific project circumstances, a full and detailed justification for any proposed alternatives is needed as part of the site-specific environmental assessment.</p> <p>Effective management of environmental, health, and safety (EHS) issues entails the inclusion of EHS considerations into corporate and facility-level business processes in an organized, hierarchical approach that includes the following steps:</p> <ul style="list-style-type: none"> • Identifying EHS project hazards and associated risks as early as possible in the facility development or project cycle, including the incorporation of EHS considerations into the site selection process, product design process, engineering planning process for capital requests, engineering work orders, facility modification authorizations, or layout and process change plans. • Involving EHS professionals, who have the experience, competence, and training necessary to assess and manage

			<p>EHS impacts and risks, and carry out specialized environmental management functions including the preparation of project or activity-specific plans and procedures that incorporate the technical recommendations presented in this document that are relevant to the project.</p> <ul style="list-style-type: none">• Understanding the likelihood and magnitude of EHS risks, based on:<ul style="list-style-type: none">➤ The nature of the project activities, such as whether the project will generate significant quantities of emissions or effluents, or involve hazardous materials or processes;➤ The potential consequences to workers, communities, or the environment if hazards are not adequately managed, which may depend on the proximity of project activities to people or to the environmental resources on which they depend.• Prioritizing risk management strategies with the objective of achieving an overall reduction of risk to human health and the environment, focusing on the prevention of irreversible and/or significant impacts.• Favoring strategies that eliminate the cause of the hazard at its source, for example, by selecting less hazardous materials or processes that avoid the need for EHS controls.• When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants to workers or environments.• Preparing workers and nearby communities to respond to accidents, including providing technical and financial
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			<p>resources to effectively and safely control such events, and restoring workplace and community environments to a safe and healthy condition.</p> <ul style="list-style-type: none"> • Improving EHS performance through a combination of ongoing monitoring of facility performance and effective accountability. <p>The organisation shall ensure that its operations encompass the provisions of the guidelines by managing its activities in such a manner as to:</p> <ul style="list-style-type: none"> • Minimise the impact of its activities on the environment, i.e. air, water, land, natural resources. • Protect the health and safety of workers by identifying the hazards, identifying who might be harmed and how, assessing the risks, categorizing the risks, identifying and implementing control measures. • Protect the environment, health and safety of the community from impacts arising from the organisation's activities. • Protect the environment and the health and safety of workers and the community during construction and decommissioning works. <p>The occupational health and safety part of the EHS guidelines oblige employers and supervisors to implement all reasonable precautions to protect the health and safety of workers. The guidelines require that focus be placed not only on the operational phase of projects but also on construction and decommissioning activities. Companies are further required to hire contractors that have the technical capability to manage the occupational health and</p>
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			<p>safety issues of their employees and to extend the application of the hazard management activities through formal procurement agreements.</p> <p>The guidelines require preventive and protective measures to be introduced according to the following order of priority:</p> <ul style="list-style-type: none"> • Eliminating the hazard by removing the activity from the work process. Examples include substitution with less hazardous chemicals, using different manufacturing processes, etc. • Controlling the hazard at its source through use of engineering controls. Examples include local exhaust ventilation, isolation rooms, machine guarding, acoustic insulating, etc. • Minimizing the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training in safe work procedures, lock-out and tag-out, workplace monitoring, limiting exposure or work duration, etc. • Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE. <p>The application of preventive and control measures to be based on comprehensive job safety or job hazard analyses.</p>
2.	ESS 2: Labour and Working Conditions:	<ul style="list-style-type: none"> • ESS2 provides specific requirements on occupation health and safety, expanding upon the World Bank Group's Environmental, Health and 	Provides for a safe and healthy work environment taking into account inherent risks in its particular sector and specific classes of hazards in the work areas. Measures relating to occupational health and safety will be applied to the project.

		<p>Safety Guidelines.</p> <ul style="list-style-type: none">• It introduces labor management procedures.• It requires non-discrimination and equal opportunity.• ESS2 includes provisions on the treatment of direct, contracted, community, and primary supply workers, and government civil servants.• ESS2 recognizes workers' organizations. It requires a grievance mechanism for all project workers.• ESS2 includes protection of project workers, including vulnerable workers, such as women, and persons with disabilities.• Prevents the use of all forms of forced labor and child labor	
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Project Occupational Health and Safety Requirements

A worker is also expected to take reasonable care for his/her own health and safety and that of other persons who may be affected by his/her acts or omissions at the workplace. The OHS is applicable to all categories of workers of the project. Therefore, before the implementation, the PMU or leading entity should have conducted subproject screening, prepared an Environmental and Social Management Plan (ESMP) that includes or accompanies a standalone OHS plan for large infrastructure projects like road rehabilitation and bridge construction and includes OHS terms and conditions in the bids and contracts for each subproject including OHS requirements and the preparation of a Contractor's Environmental and Social Management Plan (C-ESMP) and an appropriate scaled OHS plan. The leading entity or contractor will be required:

- to conduct a hazard analysis of the work tasks and activities to identify potential OHS risks
- prepare preventive and mitigation measure following the mitigation hierarchy (elimination, substitution, engineering controls, administration controls, PPE)
- training and communication
- OHS objectives and targets
- Work permit system
- Management of subcontractors
- Health and safety at project sites
- Include provisions for emergency responses in the OHS plan with a focal contact officer should an accident occur.
- Keep the site free of drugs and alcohol.

The contractor's OHS plan will include provision for a safe work environment and provide safety measures and protective equipment to all workers, including hand, head, eye and ear protection and safety footwear. The site safety plan will include training at regular intervals to workers to enhance their OHS skills, provision of first aid facilities on-site and employ a trained first aid person, in accordance with the provisions of the Occupational Health and Safety Act No. 36 of 2010 and the Public Health Act Chapter 295 of the Laws of Zambia. The PMU and Contractor will document, report and investigate all occupational accidents and incidents no later than 48 hours after learning of the incident or accident and in accordance with World Bank incidence classification and national laws.

Community Health and Safety

Management of OHS for community workers

Ensuring the safety and well-being of community workers engaged in construction projects is paramount. The following measures should be implemented together with provisions included in the ESMF:

- Appropriate road safety policies, plans, construction standards and mitigation measures detailed in the ESMFs.

- Appropriate use of international recognized building and infrastructure construction codes with an emphasis on climate resilience
- Sub project site security measures to prevent accidental and intentional encroachment on project sites, theft of equipment, attacks and robbery encroachment.
- Appropriate waste management plans including the use of the standards and management procedures and where appropriate.
- Comprehensive and well-rehearsed emergency response measures to address potential subproject unanticipated incidents, arising from both natural and man-made hazards in protected and unprotected areas that includes but is not limited to a catastrophic fuel leak into a waterway or an explosion of a fuel installation
- The appropriate level, Malaria and other current communicable diseases mitigation measures.
- All ESMPs should include a thorough assessment of operational safety hazards and will provide an appropriate level of mitigation measures such as the potential for pollution events that will contaminate local community water resources etc.
- Training and Orientation: Provide comprehensive training on safety protocols, proper use of equipment, and emergency procedures.
- Personal Protective Equipment (PPE): Supply workers with necessary PPE such as helmets, gloves, and safety boots, and ensure they are used correctly at all times.
- Supervision and Support: Assign experienced supervisors to oversee the work and provide immediate assistance when needed.
- Health Checks: Conduct regular health assessments to ensure workers are fit for the tasks assigned.
- OHS Measures for the Operations and Maintenance (O&M) Phases to be prepared
- The appropriate management of hazardous materials to prevent discharge to the environment, fire or accidental or intentional access by local community members. Environmental risks and impacts from matching grant activities that are related to ESS 4 could be similar to the direct and indirect impacts from component activities but on a smaller scale. Similarly, risks and impacts associated with project Technical Assistance (TA) activities are likely to be moderate and mitigated by adopting ESS 4 requirements Terms of Reference of TA activity.

Occupational Health and Safety during the O&M phases

- Risk Assessment: Identify potential hazards and develop mitigation strategies.
- Documentation: Maintain detailed records of OHS measures and incidents. This includes risk assessments, training records, and maintenance logs.
- Regular Inspections: Conduct routine inspections to ensure compliance with safety standards.
- Emergency Preparedness: Develop and regularly update emergency response plans.
- OHS Documentation and Responsibility

The responsibility for documenting OHS measures should be clearly assigned:

- O&M Teams: Responsible for day-to-day documentation and immediate reporting of incidents.
- Project Management Units (PMU): Oversee and verify documentation, ensuring all measures are properly recorded and reported to relevant authorities.

OHS Measures for Technical Assistance (TA) Activities

Ensuring OHS in TA activities involves integrating safety protocols into studies and protecting consultants:

- Incorporation of OHS in Studies: Ensure that all TA studies include an assessment of OHS risks and recommendations for mitigation.
- Consultant Safety: Implement measures to protect consultants, especially during travel, including providing travel safety guidelines, emergency contacts, and necessary insurance.
- OHS Reporting by Construction Contractors and O&M Implementing Entities

Effective OHS reporting is essential for monitoring compliance and performance:

- Routine Reporting: Contractors and O&M entities must submit regular reports on OHS compliance and performance. These reports should include data on incidents, near-misses, and corrective actions taken.
- Immediate Reporting: Any significant OHS accidents must be reported immediately to the PIU and other relevant authorities. This ensures timely interventions and mitigation of further risks.

PIU Supervision and Monitoring of OHS Activities

The Project Management Unit plays a crucial role in supervising and monitoring OHS activities:

- **Regular Audits:** Conduct regular audits of construction sites and O&M activities to ensure compliance with OHS standards.
- **Performance Reviews:** Evaluate the performance of contractors and O&M entities based on their OHS measures and incident records.
- **Feedback Mechanism:** Establish a feedback mechanism to continuously improve OHS practices based on lessons learned and new developments.
- PIU OHS Routine and Immediate Reporting to World Bank (WB)

Effective communication with the World Bank is vital for transparency and accountability:

- Routine Reporting: Submit comprehensive reports to the WB on a regular basis, detailing OHS compliance, performance metrics, and actions taken to address any issues.
- Immediate Reporting: In the event of a significant OHS accident, the PIU must report the incident to the WB immediately, providing all relevant details and subsequent actions taken to mitigate the situation.

6. RESPONSIBLE STAFF

The PMU, under the Ministry of Home Affairs and Internal Security, will be responsible for the overall project management and coordination, including compliance with national labor laws along with ESS2 and ESS4 requirements. The responsibilities of the PMU will be as follows;

The Project Coordinator will be responsible for overall management and coordination of the ZRHCP activities implementation assisted by seven project specialists comprising financial management, environment, social, procurement, communication, M&E, day-to-day fiduciary requirements and technical engagements will further be achieved with support of office administration, accountants, and transport officers. With respect to accountability, the PMU will report to the overall supervision of the Project Coordinator through whom all Project reports will be made to the Permanent Secretary at the Ministry of Home Affairs and Internal Security. The Project organization structure is presented in Figure 1 below.



Figure 1: Project organization structure

The ES Specialist under the Satellite Project Management Unit will oversee all aspects , including but not limited to of the implementation of the LMP, to ensure contractor and/or Supervising Engineer or Supervising Consultant compliance with the ESMP, C-ESMP, OHS plans, etc. The Supervising engineer will need to have site specific OHS Specialist for large infrastructure subprojects including road rehabilitation and bridge construction. Contractors are also supposed to have health and safety officers . The PMU will be responsible to notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. The PMU will provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. All major incidents and accidents will be reported within 48 hours. All these others to be reported routinely.

The PMU will manage all aspects of the LMP during the hiring process for works and during the induction of procured contractors to the Project. The contractor will be responsible for managing their workers' contracts in compliance with national labor laws, World Bank ESS2, ESS4, and LMP requirements, under the monthly supervision of the PMU. The contractor will be required to adhere to the LMP requirements as part of their contract for the Project works

7. TRAINING OF WORKERS

The PMU in collaboration with the relevant authorities will manage trainings under OHS for construction works involving contractors, contractors will be responsible for training of workers and the Satellite PMU will monitor implementation. For agribusiness activities, individuals and cooperatives receiving investment support under Comp 3 will be trained by technical service providers (TSPs) while workers from the community who will perform construction will be trained by the PMU:

- a) HIV/AIDS – provide information on HIV/AIDS in terms of prevention measures or treatment.
- b) GBV – conduct trainings on the various forms of GBV and how they can be prevented. Also sensitize the workers on the GRM in case they face any grievance.
- c) Child labor - the workers and communities will be sensitized on child labor and how to prevent it.
- d) Specific training be developed/used for community workers doing construction in addition to regular toolbox trainings on the proper use of Personal Protective Equipment and areas of health and safety, including safe use of equipment or tools, housekeeping, induction training, first aid, emergency response procedures etc.,
- e) OHS plan - (i) conduct a hazard analysis of the work tasks and activities to identify potential OHS risks (ii) prepare preventive and mitigation measure following the mitigation

hierarchy (elimination, substitution, engineering controls, administration controls, PPE)
(iii) training and communication (iv) OHS objectives and targets (v) work permit system
(vi) management of subcontractors (vii) health and safety at project sites (viii) include provisions for emergency responses in the OHS plan with a focal contact officer should an accident occur etc.

8. POLICIES AND PROCEDURES

The ZRHCP is dedicated to guaranteeing that all decisions regarding the employment and treatment of project workers are made without any form of discrimination. Employment within the project will strictly follow the principles of equal opportunity and fair treatment, ensuring there is no discrimination in recruitment, hiring, compensation, working conditions, access to training, promotion, or disciplinary practices. This section details the core policies and procedures to be adhered to throughout the project's implementation. These procedures are not exhaustive and may be revised as necessary.

ZRHCP operations will align with the Employment Code Act No. 3 of 2019, the Industrial and Labor Relations Act, Chapter 269 of the Laws of Zambia, the Occupational Health, and Safety Act No. 36 of 2010), and relevant International Labor Organization (ILO) conventions. These policies and procedures are designed to ensure the non-discriminatory employment of project workers, including hiring, compensation, and access to training and promotions.

The following minimum requirements will guide the recruitment and management of project workers under ZRHCP:

- **Transparent Recruitment:** Recruitment will be public, non-discriminatory, and open to all individuals, regardless of ethnicity, religion, gender, disability, or other personal characteristics.
- **Official Application Process:** Applications will only be considered if submitted through the official procedures established by ZRHCP.
- **Clear Job Descriptions:** Job descriptions outlining the required skills and responsibilities will be provided prior to recruitment.
- **Written Contracts:** All workers will receive written contracts detailing the terms and conditions of employment. These terms will be explained orally if necessary and signed by both parties.
- **Local Recruitment:** Unskilled labor will be preferentially recruited from local communities.
- **Termination Notices:** If applicable, termination notices will comply with the requirements set by chapter 268 Section 20 of the Employment Act.
- **No Hiring Fees:** Workers will not be required to pay hiring fees; if such fees are incurred, the employer (i.e., the contractor) will cover them.
- **Language and Clarity:** Terms and conditions of employment will be communicated in a language understood by both the employer and the employee.
- **Age Restrictions:** All workers must be at least 16 years old, and national IDs will be used to verify age.

- **Worker Code of Conduct:** Contractors must develop a Code of Conduct for all workers, which ZRHCP will review to ensure alignment with project standards.

8.1 Prohibition of forced and Child Labor

ZRHCP strictly prohibits forced and child labor. Contractors, suppliers, and service providers will ensure no worker is forced to work under any form of duress, coercion, or limitation of freedom. Contractors ensure workers' rights to terminate their employment freely within the legal framework.

8.2 Occupational Health and Safety Compliance

ZRHCP is committed to:

1. Abide by national legislation, World Bank standards, and the World Bank Group Environmental, Health, and Safety (EHS) guidelines.
2. Promote active participation in OSH risk mitigation through skills training and awareness.
3. Strive to improve OSH management and performance continually.
4. Regular communication ensures that all workers know OSH's responsibilities.
5. Make this OSH policy available to all parties at ZRHCP facilities and sites.

ZRHCP will ensure that all its contractors designate a Safety, Health, and Environmental Representative at each workplace. This representative is responsible for:

- Identifying potential OHS hazards and provide appropriate corrective actions.
- Ensuring all workers undergo an induction training prior to commencement of works
- Investigating accidents in collaboration with the employer.
- Inspecting workplaces to ensure employee safety and health.
- Making safety and health recommendations to the employer or safety committee.
- Accompanying inspectors during workplace inspections.

8.3 Occupational Health and Safety for Contractors

To prevent workplace accidents and injuries, contractors will:

- Have an OHS Policy to be signed by top management of the organization as part of the CESMP and health and safety management plan.
- Employ workers with relevant and adequate training for specialized roles
- Provide OHS Training: Offer safety training to all employees involved in project activities.
- Supply PPE: Ensure all workers can access PPE, such as masks, helmets, gloves, safety boots, and goggles.

- Safety Equipment: Equip high-noise areas with ear protection and ensure the availability of first aid kits.
- Provide appropriate work equipment including safe machinery and hand tools
- Access to Facilities: Provide access to toilets, potable water, and other necessary facilities.
- Implement Waste Management: Follow proper waste disposal and pollution prevention protocols.
- No PPE, No Pay Policy: Contractors must enforce PPE use through a strict "No PPE, No Pay" policy.

8.4 Risk and Incident Reporting

Contractors are required to:

- Conduct site risk assessments for all tasks prior to commencement of works and fill in the site risks assessment form with corrective actions.
- Prepare safe systems of work and method statements.
- Put in place incident reporting procedures including incident registers for recording of all incidents
- Report all incidents including near misses and minor incidents to Project Management Unit monthly.
- Report serious incidents or fatalities within 24 hours to ZRHCP and the World Bank.
- Log all incidents and accidents, incorporating them into regular monitoring and evaluation.

9. GENDER BASED VIOLENCE, SEXUAL EXPLOITATION AND ABUSE, AND SEXUAL HARRASSMENT

The implementation of ZRHCP is likely to result in an influx of people seeking employment opportunities from surrounding communities. This has the potential of increasing the risk of GBV, SH, and SEA in a context where GBV is already prevalent. Increased disposable income for workers and community members may also contribute to such incidents. This could occur when many contractor workers interact with local communities, leading to unsafe practices or forced relationships in exchange for favors. ZRHCP will strictly prohibit GBV, SH, and SEA, whether they occur on work sites, in worker camps, or within local communities. ZRHCP will comply with the core principles of the Interagency Standing Committee (IAC) on SEA, incorporated into the UN Secretary General's Bulletin on SEA in 2003. This includes a zero-tolerance policy for SEA, an obligation to report incidents, and a strict prohibition of sexual activity with individuals under the age of 18.

The project acknowledges the possibility of increased demand for sex work, early marriages, and transactional sex due to economic changes in project-affected communities. Thus, preventive measures will be implemented to ensure community members' and workers' safety and well-being.

9.1 Mitigation Measures of GBV/SEA/SH

Given that ZRHCP is assessed to have a substantial GBV risk, the following measures will be adopted to mitigate potential issues:

- **GBV/SEA/SH Action Plan:** Developed SEA/SH Action Plan, to assess and manage the risks of SEA and SH in the Project annexed to the ESMF.
- **Community Awareness:** Engage in stakeholder consultations to inform affected communities about GBV risks and the project's stance on GBV, SH, and SEA.
- **Map Out Services:** Identify and establish links with local GBV prevention and response services within the project's area of influence using existing district structures.
- **Grievance Redress Mechanism (GRM):** Ensure the availability of an effective GRM with multiple channels for reporting complaints, including GBV-related grievances. The GRM will have a sensitive approach towards addressing GBV and SEA.
- **Clear Guidelines:** Define GBV requirements and expectations in bid documents, including the need for a Code of Conduct (CoC) addressing GBV. Contractors must ensure that all staff members understand and adhere to the CoC.
- **Sanitary Facilities:** At work sites, provide separate sanitary facilities and changing rooms for men and women, along with clear "GBV-free zone" signage.
- **Training and Awareness:** Conduct training and awareness programs for GBV, SEA, and SH for workers. Contractors will be responsible for enforcing behavioral standards among their workforces.

9.2 Reporting and Handling of GBV/SEA/SH Incidents

- All GBV incidents will be treated as confidential and reported through established community and district-level structures while respecting the survivor centered approach principle.
- Each Grievance Redress Committee (GRC) will include GBV Champions, trained to handle GBV/SEA incidents sensitively.
- Community awareness initiatives will highlight the roles of GRCs and the availability of GBV Champions to support survivors.
- For Workers' GRCs, all employees will be made aware of the process for reporting GBV or SH concerns.
- The community members will be encouraged to report any criminal cases to the police, who will then involve district structures to ensure that survivors receive the necessary support.
- To ensure a prompt response, all cases will be reported to the PMU within 24 hours.

10. AGE OF EMPLOYMENT

With respect to the age of employment, the following provisions shall apply:

- a) Minimum age of employment - The Employment Code Act, No. 3 of 2019 of the laws of Zambia, sets out the minimum contractual age at 15 years. The proposed project will be guided by the Act.
- b) Process to be followed in verifying age of project workers – the workers will be asked to produce their national registration card or other document as proof of age of the applicant.
- c) Once underage workers are found working under the project, the cases shall be addressed in accordance with procedures highlighted in the Employment Code Act of 2019.

11. TERMS AND CONDITIONS

ZRHCP will be implemented as a government project. As earlier indicated, the direct workers are existing employees in the Public Service in Zambia. The project will also engage contracted workers, primary supply workers and community workers. The Project will ensure all terms and conditions of employment for all workers of the Project meet set minimum employment terms and conditions in accordance with national employment laws.

Overall, the Project will observe national employment law through entitlements such as a minimum wages scale, non-discrimination, and equal opportunity, working hours will be from 08:00 hours to 17:00 hours Monday to Friday including a lunch break of one hour. Work over weekends will be agreed upon as stipulated in Employment Code Act of Zambia, annual leave, and other applicable forms of leave (maternity, sick leave, special leave, etc.), as well as duration of employment and right to form associations. Furthermore, the Employment Code Act will also guide the Program on 'in kind payments' in cases it will be allowed for personal use and benefit of a community worker. The Project will ensure worker's compliance with national laws barring SEA/SH and GBV in a workplace through knowledge creation and an operational grievance procedure.

For this project, the following provisions will inform management of all workers engaged on the project:

Direct workers: The terms and conditions for direct workers under the PMU, consultants and workers at the project supported facilities will be governed by National Labour Laws. Workers who are on short-term employment will not have maternity or annual leave, etc. Their terms and conditions will be based on a specific assignment to be completed within a specified period at a pay rate per day. These terms and conditions will be discussed at recruitment.

Contracted workers: The Employment Code Act and associated public service regulations are the guiding legislations on employment terms and conditions for contracted workers. The MoHAIS shall therefore follow the provisions related to labour engagements and management.

Minimum Wages: The official minimum wage will be governed by the provisions of the Employment Code Act of 2019. All efforts will be made to ensure that contractors do not underpay and overwork their workers, more so temporary (casual) workers.

Hours of Work: Normal hours of work of a project worker during days of the week (Monday to Friday) shall not exceed 8 hours a day. Hours worked in excess of the normal hours shall be entitled to relevant allowances.

Rest per week: All the workers under the PMU shall be entitled to rest on Saturday, Sunday and on public holidays recognized as such by the Republic of Zambia.

Annual leave: All PMU workers (apart from consultants) shall be entitled to 30 days' leave with pay for every year of continuous service. An entitlement to leave with pay shall normally be acquired after a full year of continuous service.

Maternity and Paternity leave: A female worker shall be entitled, on presentation of a medical certificate indicating the expected date of her baby to a 14 week maternity leave while male workers shall be entitled for paternity leave of 7 days with pay, provided that she/he has been employed by the employer for at least six months without any interruption on her part except for properly certified illness.

Deductions from remuneration: No deductions other than those prescribed in labour laws shall be made hereunder or any other law or collective labour agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. The employer shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.

Death benefit: In case of death of a worker during his/her contract of employment, the employer shall pay to his/her remuneration as death benefits in-line with the provisions of the relevant laws.

Medical treatment of injured and sick workers: Contract workers shall at a minimum be expected to be enrolled on an insurance policy by the contractors. All other workers will continue to benefit from medical insurance as arranged by their employers (e.g. for civil servants the civil service insurance scheme or the National Health Insurance Management Authority (NHIMA)).

Compassionate leave: An employee is entitled to compassionate leave with full pay of up to at least twelve (12) days in a calendar year for losing a spouse, child, and parent, dependent or on justifiable compassionate grounds.

12. GRIEVANCE REDRESS MECHANISM

The ZRHCP will establish a comprehensive GRM to ensure that all project workers, including contractors, have a fair and accessible means to lodge complaints or concerns. This mechanism will aim to address grievances efficiently, transparently, and at no cost to the complainant, while ensuring timely and satisfactory resolutions. The GRM will be communicated to all workers during the recruitment process and throughout the project's lifecycle.

The GRM will handle all types of grievances, including but not limited to work-related issues, labor practices, health and safety concerns, and incidents of discrimination. Criminal matters, however, will be referred to the appropriate authorities. Examples of grievances include:

- Unfair dismissal from work.
- Suspected corruption or theft.
- Unsafe working conditions.
- Non-compliance with environmental standards, such as poor waste management.
- Payment of wages below the minimum set by national labor laws.
- Delayed or non-payment of wages.
- Excessive working hours or poor working conditions.
- Child labor or forced labor.
- Incidences of GBV, SH, and SEA.
- Discrimination based on race, gender, ethnicity, or other factors.

ZRHCP will establish a Workers' Grievance Redress Committee (WGRC) at each contractor level to facilitate the implementation of the GRM. The WGRC will include the following members, ensuring at least 40% representation of each gender:

- Three (3) contractor workers' representatives, including ESHS personnel
- One (1) contractor representative
- District Labour Officer

The chairperson and secretary will be chosen among the committee members, who shall serve in that capacity for the duration of project implementation works

12.1 The GRM Process

The GRM process consists of five key stages to ensure transparency and fairness:

Stage 1: Complaint Uptake

Workers can submit their complaints directly to the WGRC in person, via phone, email, or through drop boxes provided at workplaces. ZRHCP will also accept anonymous grievances to encourage open communication. Complaints can also be directed to the Project Coordinator at National office through the following contact details:

Project _____ Manager.....

Mechanisms to Identify and Receive Grievances:

- Direct contact: Via phone, letter, email, social media, or in person at the site office. Anonymous grievances are accepted.
- WGRC Contact: Workers present their complaints to the WGRC.
- Suggestion Boxes: Available at contractor camps, engineering offices, and local government offices around the project area.
- Exit Interviews: To gather feedback from employees about issues they may not have raised while employed.
- Information Table: A regular information table at the work site where workers can ask questions or express concerns.
- ZRHCP will establish a dedicated grievance uptake channels domiciled at National office as follows:
 - A dedicated GRM Phone Number with WhatsApp and Text facility.
 - A dedicated GRM Toll-Free Number with voice functions.
 - A dedicated email address

Stage 2: GRM Registry

All grievances are logged in a secure and accessible registry system. The Workers' Grievance Log and Resolution Form document cases heard, closed, or referred. This ensures transparency and allows for monitoring and evaluation of the process.

Stage 3: Investigation, Assessment, and Response

Once a complaint is received, the WGRC will assess its relevance to the project and provide a resolution within 14 working days. If a complaint is unrelated to the project, the worker will be advised to seek redress through the appropriate channels. The complainant will be informed of the status and expected resolution timeframe for complex cases requiring longer investigation.

Stage 4: Resolution and Closure

If a resolution is reached and accepted by the complainant, they will sign the resolution section of the Grievance Log and Resolution Form, along with two WGRC members (the Chairperson and Secretary). If the issue remains unresolved, the complainant may seek legal redress through civil courts.

Stage 5: GRM Monitoring and Evaluation

The GRM will be evaluated periodically to ensure its efficiency and effectiveness. Regular monitoring will track the number of complaints received, resolved, and outstanding, allowing for necessary adjustments to be made. This evaluation will help assess the impact of the GRM on workers' concerns and the overall project.

12.2 Direct workers

Direct workers engaged for the project will be informed of the existing institutional grievance mechanism in place for the workers as part of their orientation process and this will be included in their contracts. The institutional grievance mechanism committee is composed of:

1. The Permanent Secretary-CRIAR
2. Human Resource and Administration (Chairperson).
3. Commissioner for Refugees (Secretary).
4. Director- Procurement
5. Director- Finance
6. Project Coordinator-Zambia Refugee and Host Communities.

The Social Specialist will be the focal point in the PMU to address grievances raised by individual workers or those raised in a group set up. The grievances raised by workers will be recorded with the actions taken by each unit. The summary of grievance cases will be reported to the World Bank as part of the regular report. Where the aggrieved direct workers wish to escalate their issues or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the workers may raise the issues with Ministry of Home Affairs and Internal Security.

12.3 Contracted workers

Contractors will be required to establish procedures for workers to report complaints through the human resource officer or their immediate supervisors. In addition, contracted workers will also be encouraged to utilize existing complaint channels that established collective bargaining groups. Beyond the established worker grievance channels, workers will also be at liberty to register concerns on non-compliance by their employers through the respective labour offices under Ministry of Labour. The mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

12.4 Community Workers

Dependent on the number of community workers engaged on the project and commensurate to the potential of grievances arising, community workers will be informed of the existing complaints mechanism for workers. Through the PMU, two representatives (male and female) will be identified as focal persons for registering complaints from community workers. The complaint handling for community workers will be aligned with traditional mechanisms for conflict resolution to ensure the process is culturally appropriate for concerned parties.

13. CONTRACTOR MANAGEMENT

Under the ZRHCP, contractors will undertake several construction activities, including the improvement of the 38 km gravel road serving the Meheba Refugee Settlement and the host community, community electrification, expansion of boarding school accommodation, teacher

accommodation, health facilities, and WASH facilities. To ensure fair competition and transparency, contractors will be selected in accordance with the guidelines established by the Public Procurement Act of 2020. This process will include:

- Competitive Bidding: Conducted through transparent, open advertising to ensure a fair selection process.
- Shortlisting and Selection: Contractors will be shortlisted and selected based on their qualifications and compliance with project requirements.
- Contractual Signing: Formal agreements between the selected contractors and the implementing agency will be signed.

The ZRHCP will integrate labor and working condition requirements into all contractual agreements. Contractors are required to develop a Contractor's Environmental and Social Management Plan (ESMP) and a detailed Code of Conduct for their workers to sign. These stipulations will be clearly outlined in the bid documents and the contract to ensure complete compliance

ZRHCP will monitor and evaluate contractor activities regularly in line with the ZRHCP Monitoring and Evaluation Framework. ZRHCP will ensure that contractors adhere to the provisions of the LMP including their sub-contractors. The project will also enhance awareness among workers about their rights and entitlements.

Additionally, contractors will be expected to:

- Monitor, Record, and Report: Maintain detailed records and provide regular reports on labor management, including information on worker contracts, induction processes, working hours, remuneration, overtime, and compliance with collective bargaining agreements.
- Safety Management: Document recordable incidents, conduct root cause analyses, and report first aid cases, high potential near misses, and other occupational health and safety (OHS) issues. This will involve revising job safety analyses, introducing new equipment or procedures, and conducting regular safety training.
- Track Worker Details: Keep records of the workforce, including numbers, origin (local or expatriate), gender, age (ensuring no child labor), skill level (unskilled, skilled, supervisory, professional, management), and other relevant details.
- Training: Records of training to be prepared and maintained which shall include; training dates, training register signed by trainees, number of trainees, and training topics to ensure ongoing capacity building.
- Security Risks: Identify and assess potential risks associated with project activities, including risks from external third parties.

- Worker Grievances: Document and address worker grievances, including dates of occurrence, nature of grievances, actions taken, resolution status, and follow-up steps. Grievances will be recorded in regular reports to the implementing agency.

13.1 Code of Conduct

The Code of Conduct developed by contractors will aim to prevent and mitigate social risks associated with project activities. This includes addressing risks of gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), child labor, forced labor, wage disputes, health risks (such as HIV/AIDS), and environmental issues. The ZRHCP will require contractors to establish a safe working environment, and this Code of Conduct will serve as a legally binding document that sets behavioral standards for all workers. Annex 4 provides a Code of Conduct for every worker engaged by the contractor.

13.2 Incident Reporting

The PMU will report to the World Bank upon learning about the incident and trigger the Bank's Environmental and Social Incident Toolkit (ESIRT) in the event of:

- Fatality.
- Lost Time Injury.
- Acts of Violence/Protest.
- Sexual Exploitations and Abuse/ Sexual Harassment
- Disease Outbreaks.
- Forced Labor, and
- Others such as an incident requiring hospitalization and resulting in major and multiple injuries.

The PMU shall report the incident within 24 hours of its occurrence, followed by a detailed report to be submitted within 10 days. Thereafter, PMU shall ensure that corrective actions are completed adequately.

Supervision and monitoring of Contractors

The supervising engineer will oversee the contractors' compliance with the LMP and OHS regulations, while the E&S Specialist at the Satellite PMU will monitor the contractor and report to the Project Coordinator at the National PMU.

14. PRIMARY SUPPLY WORKERS

The implementation of ZRHCP will engage primary supply workers in activities involving construction/rehabilitation materials (roads and bridges, mini-hospitals and schools), professional expertise (interpretative signage, and office/management infrastructure), IT, communication equipment to mention a few. The Project will ensure adherence to ESS2 and ESS4 requirements and national labor law through formal labor contracts.

All the contractors will obtain materials and quarries with valid operating licenses. The Ministry will be responsible for carrying out periodic inspections, verifying that enterprises are compliant with national laws and regulations relating to OHS and measures against forced labour and response to GBV/SEA/SH.

All the requirements of this LMP shall apply to all primary supply workers on site, including the following, as indicated in this procedure related to:

- Code of conduct related to labour conditions;
- Site security and occupational health and safety;
- Prevention of child labour or forced labour;
- Prevention of Sexual Exploitation, Abuse and Harassment and Gender Based Violence;
- Discrimination, inappropriate treatment, or harassment.

The Ministry of Home Affairs and Internal Security through the PMU will identify potential risks of child labor, forced labor and serious safety issues which may arise in relation to primary suppliers. Additionally, where there is a significant risk of serious safety issues related to primary supply workers, the PMU will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness. The ability of the MoHAIS through the PMU to address these risks will depend upon the level of control or influence over its primary suppliers. Where remedy is not possible, the PMU will, within a reasonable period, shift the project's primary suppliers to those that can demonstrate ability to meet relevant requirements of this LMP.

The PMU will also have the responsibility of investigating any credible allegations of violations of LMP before the contract is terminated. Contractor's attention to this will be in writing stating intention to terminate the contract unless the neglect is corrected in a reasonable time demanded by the Client.

15. ANNEXES

Annex 1: Employee Contract

Employment Contract

This contract, dated on the ____ day of _____ in the year 20____, is made between [company name] and [employee name] of [city, state]. This document constitutes an employment agreement between these two parties and is governed by the laws of [state or district].

WHEREAS the Employer desires to retain the services of the Employee, and the Employee desires to render such services, these terms and conditions are set forth.

IN CONSIDERATION of this mutual understanding, the parties agree to the following terms and conditions:

1. Employment

The Employee agrees that he or she will faithfully and to the best of their ability to carry out the duties and responsibilities communicated to them by the Employer. The Employee shall comply with all company policies, rules and procedures at all times.

2. Position

As a [job title], it is the duty of the Employee to perform all essential job functions and duties. From time to time, the Employer may also add other duties within the reasonable scope of the Employee's work.

3. Compensation

As compensation for the services provided, the Employee shall be paid a wage of \$/ZMW_____ [per hour/per annum] and will be subject to a(n) [quarterly/annual] performance review. All payments shall be subject to mandatory employment deductions (State & Federal Taxes, Social Security, Medicare).

4. Benefits

The Employee has the right to participate in any benefits plans offered by the Employer. The employer currently offers [list benefits, if any]. Access to these benefits will only be possible after the probationary period has passed.

5. Probationary Period

It is understood that the first [time frame] of employment constitutes a probationary period. During this time, the Employee is not eligible for paid time off or other benefits. During this time, the

Employer also exercises the right to terminate employment at any time without advanced notice. Check the term and conditions.

6. Paid Time Off

Following the probationary period, the Employee shall be eligible for the following paid time off: • [length of time for vacation] • [length of time for sick/personal days] • Bereavement leave may be granted if necessary.

The employer reserves the right to modify any paid time off policies.

7. Termination

It is the intention of both parties to form a long and mutually profitable relationship. However, this relationship may be terminated by either party at any time provided [length of time] written notice is delivered to the other party.

The Employee agrees to return any Employer property upon termination.

8. Non-Competition and Confidentiality

As an Employee, you will have access to confidential information that is the property of the Employer. You are not permitted to disclose this information outside of the Company.

During your time of Employment with the Employer, you may not engage in any work for another Employer that is related to or in competition with the Company. You will fully disclose to your Employer any other Employment relationships that you have and you will be permitted to seek other employment provided that (a.) it does not detract from your ability to fulfill your duties, and (b.) you are not assisting another organization in competing with the employer.

It is further acknowledged that upon termination of your employment, you will not solicit business from any of the Employer's clients for a period of at least [time frame].

9. Entirety

This contract represents the entire agreement between the two parties and supersedes any previous written or oral agreement. This agreement may be modified at any time, provided the written consent of both the Employer and the Employee.

10. Legal Authorization

The Employee agree that he or she is fully authorized to work in [community name] and can provide proof of this with legal documentation. This documentation will be obtained by the Employer for legal records.

11. Severability

The parties agree that if any portion of this contract is found to be void or unenforceable, it shall be struck from the record and the remaining provisions will retain their full force and effect.

12. Jurisdiction

This contract shall be governed, interpreted, and construed in accordance with the laws of [state, province or territory].

Occupational Health and Safety (OHS) Clause

1. Definitions and Scope

For the purposes of this clause, "hazard" means any source of potential damage, harm, or adverse health effects on something or someone. "Risk" refers to the likelihood of the hazard causing harm. This clause applies to all activities, locations, and parties associated with the execution of this contract.

2. Responsibilities and Duties

The Contractor shall ensure a workplace free from recognized hazards and comply with applicable OHS laws and regulations. The Worker shall perform all tasks in a safe manner and adhere to the Contractor's safety policies. The Worker shall also report any unsafe conditions to the Contractor immediately.

3. Safety Standards and Regulations

Both the Contractor and the Worker shall comply with [Insert Relevant Safety Standards and Regulations], including but not limited to, the Occupational Health and Safety standards, industry-specific guidelines, and the Contractor's internal safety policies.

4. Training and Competency

The Contractor shall provide appropriate OHS training to the Worker prior to commencing work. This includes training on hazard identification, risk assessment, emergency procedures, and the use of personal protective equipment (PPE). The Contractor shall maintain records of all training provided, and the Worker shall participate in all required training sessions.

5. Incident Reporting and Investigation

All incidents, including near-misses, accidents, and occupational illnesses, must be reported to the Contractor within 24 hours. The Worker shall cooperate in the investigation of incidents and implement corrective actions as directed by the Contractor to prevent recurrence.

6. Monitoring and Auditing

The Contractor reserves the right to conduct regular audits and inspections to ensure compliance with this OHS clause. The Worker shall provide access to all relevant documentation and cooperate with the Contractor's audit team.

7. Penalties and Consequences

Failure to comply with this OHS clause may result in disciplinary actions, including termination of employment, financial penalties, or other remedial actions as deemed necessary by the Contractor. The Worker agrees to adhere to all safety protocols to ensure their own safety and the safety of others.

In witness and agreement whereof, the Employer has executed this contract with due process through the authorization of official company agents and with the consent of the Employee, given here in writing.

Employee Signature

Date

Company Official Signature

Date

Annex 2: Sample Complaint Form

Zambia Refugee and Host Community Project, GRIEVANCE/COMPLAINT FORM
Section 1: Complaint
1. What harm do you believe the Zambia Refugee and Host Community Project caused or is likely to cause to you or your community? Please describe in as much detail as possible.
2. What location is concerned with your submission? (Please include Province/District name)
3. Do you live in the project area?
4. Have you previously reported your concerns to Zambia Refugee and Host Community Project (PIU) ? If yes, please provide the details about those communications and explain why you are not satisfied with the action in response.
5. If known, please list the operational procedures you believe have been violated by the Zambia Refugee and Host Community Project .

6. Do you expect any form of retaliation or threats for filing this complaint to the Zambia **Refugee and Host Community Project**?

Section 2: contact information

7. Are you filing an individual submission or representing a community?

Individual: Representing a community:

8. Would you like your name and contact details to be kept confidential? (Zambia, **Refugee and Host Community Project**) *will not disclose your identities to anyone without your prior consent.*) Yes
No

9. Submitter's Name & contact information:

Name:

Address:

Email:

Phone:

Preferred Method of Contact:

10. I, the undersigned, request the Zambia **Refugee and Host Community Project** to investigate the issues described above.

11. Signature/Thumbprint

Name:

Date

NOTES:

- Please attach supporting documents, if available.

Section 3: Official Use Only

Grievance ID Number

Recorded by:

Date:

Place/Method grievance was received:

Annex 3 Workers and Employer’s OHS Responsibilities

RESPONSIBLE ENTITY	RESPONSIBILITIES	KEY ACTIVITIES	MEASURES OF ACCOUNTABILITY
Project Director or equivalent	Setting of business level OHS objectives and targets	Develop and monitor implementation of business level OHS objectives and targets	Business level performance reports
Site Manager or equivalent	Coordinate all activities including those of contractors to ensure compliance to HSMP	Implementing business level OHS objectives and targets	Site level HSMP performance reports
Human Resource/Admin Manager or equivalent	Ensure human resource has the competences to enhance OHS	Identify required OHS competences by conducting training needs assessment	HR reports reflecting improved OHS competences among staff
Procurement Manager or equivalent	Ensure goods and services procured meet HSMP provisions	Liaise with H&S Manager and end users to determine OHS specs of required goods and services	Procurement plans bearing OHS specs relating to goods and services

RESPONSIBLE ENTITY	RESPONSIBILITIES	KEY ACTIVITIES	MEASURES OF ACCOUNTABILITY
Health and Safety Manager or equivalent	<ul style="list-style-type: none"> • Ensure compliance with regulations and HSMP provisions • Monitor HSMP performance 	<ul style="list-style-type: none"> • Carry out OHS inspections, trainings. • Communicate OHS information 	Risk assessment, inspection, training and induction reports
Workers	<ul style="list-style-type: none"> • Comply with all OHS measures on site • Report any near misses or incidents and accidents • Report any unsafe working practices 	<ul style="list-style-type: none"> • Worker OHS compliance 	-Employee working practices

Annex 4 Individual CoC in case of contractor

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

Preventing Gender-Based Violence (GBV) and Violence Against Children (VAC)

I, _____, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable, be it on the work site, the work site surroundings, at worker's camps, or the surrounding communities.

The company considers that failure to follow ESHS and OHS standards or to partake in GBV or VAC activities constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

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

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

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

With regard to children under the age of 18:

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

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film shall be used.

- Ensure photographs, films, and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

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

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

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

Signature : _____

Printed Name : _____

Title : _____

Date : _____