

**BANGLADESH COVID-19 SCHOOL SECTOR RESPONSE PROJECT (CSSRP)**

**Ministry of Primary and Mass Education**

**Directorate of Primary Education (DPE)**

**with the**

**Directorate of Secondary and Higher Education (DSHE)**

**LABOR MANAGEMENT PROCEDURE  
(LMP)**

**July 2021**

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## Executive Summary

This Labour Management Procedures (LMP) for the Bangladesh COVID 19 School Sector Response Project (CSSRP) has been prepared to meet the objectives and requirements of the World Bank Environmental and Social Framework (ESF) Environmental and Social Standard (ESS)-2 as well as the national Labor Laws of Bangladesh.

This LMP assesses the potential risks and impacts of assignment of labor for the implementation of the Project activities by the Implementing Agencies (IAs)—Directorate of Primary Education (DPE) with support of the Directorate of Secondary and Higher Education (DSHE) and addresses them through mitigation measures in line with ESS-2 and Bangladesh Labor policies and provisions.

Various types of workers (Direct and Contracted), their estimated numbers, characteristics etc, as well as key potential environmental and social risks—such as unscrupulous labor practices, Occupational Health and Safety (OHS) issues, community health and safety risks, exploitation of child/ forced/trafficked labor/beneficiaries as well as potential worker health and safety issues while working under COVID-19 pandemic situation, have been assessed and presented in this LMP. Given the size of the project, the potential Environmental and Social (ES) risks and impacts, the capacity of the Implementing Agencies to manage and mitigate the ES risks and the context under which the project is being implemented, the ES assessment has determined the overall ES risk to be Moderate for the project.

Provisions of ESSs, Labor Act 2006 (including Amendments of 2013 and 2018), National Child Labor Elimination Policy 2010, Governmental and WHO guidelines for COVID-19 etc, have been thoroughly studied and cited to meet their requirement and obligations. Major points of consideration that include Conditions of Employment, Occupational Health and Safety (OHS), and Child/Forced Labor etc. have also been referred to as guidelines.

A Grievance Redress Mechanism (GRM) for workers has been developed so that any potential dissatisfaction or concern can be raised by anyone employed by the IA and the PMU.

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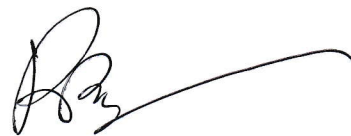
## Annex

Annex 1 : General Guidelines: COVID-19 Considerations



## List of Acronyms and Abbreviations

BCC	Behavioral Change Communications
CBA	Collective Bargaining Agent
CoC	Code of Conduct
COVID-19	CORONA Virus Disease-19
CSSRP	Bangladesh COVID-19 School Sector Response
DPE	Directorate of Primary Education
DHSE	Directorate of Secondary and Higher Education
EHSG	Environmental and Health Safety Guidelines
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GIIP	Good International Industry Practices
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IA	Implementing Agency
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
OHS	Occupational Health and Safety
PMU	Project Management Unit
SBD	Standard Bidding Documents
SHEQ	Safety, Health and Environmental Quality
WB	The World Bank
WHO	World Health Organization





## 1. INTRODUCTION

The fundamental element of conducting project work is the labor force, hence, management of the labor resources are essential to effective project implementation. These Labor Management Procedures (LMP) are prepared meeting the Bangladesh Labor Act 2006 as well as the World Bank's Environmental and Social Framework (ESF), specifically Environmental and Social Standard (ESS) 2: Labor and Working Conditions (ESS2). Further, the application of internationally accepted protocol to address COVID-19 outbreak has also been considered in this LMP.

The LMP covers the direct and contracted workers to be engaged in the Project. The Implementing Agencies (IAs) – DPE and DSHE may prepare specific procedures to be inserted in the contract as part of any legal obligations. The approach will be assessed as part of the initial screening of environmental and social (ES) risks and impacts carried out by the Project Management Unit (PMU).

## 2. OVERVIEW OF LABOR USE IN THE PROJECT

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal workers. The LMP is applicable, as per ESS2, to the Project and types of workers will be involved in the CSSRP are:

**Direct workers:** People directly appointed by the IA/PMU.

**Contracted Workers:** To conduct the disinfection activity, contracted workers will be employed by disinfecting firm(s). The disinfection workers team composition will be a field supervisor, technician and cleaners (a 7 member's team). Besides, there will be drivers and loaders-unloaders of those chemicals. To prepare 1,500 schools before re-opening, approximately 20 disinfection teams will be required who can accomplished disinfection activities within the project time frame<sup>1</sup>.

The project is not likely to engage primary suppliers or community workers. However, if primary supply workers are engaged necessary steps will be taken to ensure that no child and/or force labor is involved and OHS requirement for the PSWs are met.

Government civil servants, who will provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement. *(To implement CSSRP, direct involvement of School Management Committee (SMC) would be required, which is headed by the Local Education Officer, Head Master and two other teachers).* However, ESS2 provisions of health, safety, child and forced labor will apply to them.

### The Implementing Agencies (IA)

At the national level, a Project Steering Committee (PSC), chaired by the Secretary MoPME and co-chaired by the Secretary of SHED/MoE, will be constituted to (a) provide policy guidance to the implementing agencies; (b) approve annual development plan and review project progress; and (c) resolve implementation problems including inter-ministerial issues.

The overall responsibility of the proposed project implementation will lie with Directorate of Primary Education (DPE), as the lead implementing agency while Directorate of Secondary and Higher Education (DSHE) will support the implementation of activities with close cooperation with the DPE. A Project Implementation Committee (PIC), chaired by the Director General, DPE, and supported by DG, DSHE will be constituted to (a) review annual development plan prepared by the GPE COVID-19 School Sector Response PMU and recommend for approval by the PSC; (b) monitor project implementation progress and provide implementation support; and (c) maintain strong coordination among the implementing agencies.

A PMU for COVID-19 School Sector Response Project (CSSRP) will be put in place, which will be responsible for

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<sup>1</sup> If 25 schools prepare/month by one disinfection team, therefore 20 disinfection teams can prepare 500 schools in one month. In the end, it will take approximately 3 months to disinfect 1500 schools.



(a) planning, coordination, implementation and monitoring of project activities; (b) procurement and financial management; (c) capacity building at various level; (d) awareness campaign and communication; and (e) reporting on project progress. The project will be implemented within the parameters of the Project Appraisal Document (PAD) and the Technical Assistance Project Proposal (TAPP).

The CSSRP PMU will be led by a Project Director who will be a senior government official at least at the rank of Joint Secretary level. In addition, the Project Director will be supported by two Deputy Project Directors; one from the DPE and another from the DSHE. They will be supported by other deputed staff and consultants, including financial management specialist(s), procurement specialist(s) and environment and social development specialist(s).

Considering the unpredictable nature of the COVID-19 affect across the education streams and levels, there will be a need for high level policy coordination and guidance to inform decisions and ensure timely interventions. For this, an Advisory Committee, involving high level policy and decision makers of the two education ministries and Director Generals of DPE and DSHE will be formed. The CSSR will coordinate and support these high-level meetings, as and when necessary.

#### Type and Number of Project Worker Required for the Project

There will be a number of different categories of Project workers engaged in the implementation:

Type of Worker	Description	Designation	Number
Direct Worker	PMU ( <i>will be Government Servants</i> )	Project Director (PD)/Deputy PD	1+2
		Program Officer	4
		Admin Officer	1
		Finance Officer	1
		Account	1
		Support Staff	4
	Consultants (need basis)	E S Consultant	1
		Procurement Consultant	1
		Financial Consultant	1
		M&E Consultant	1
	School Management Committee ( <i>will be Government civil Servant</i> )	Local Education Officer	150
		Head Master	1500
		Teacher	3000
Contracted Worker	Technical and Educational Material Developer Firm	Experts and Consultants for the development of learning material, contents, technical manual etc	20
	Disinfecting firm	Numbers of Disinfection Team	20 (7 members/team)
		Field Supervisor	20 (approximately)
		Technician	20 (approximately)
		Labor / Cleaner	100 (approximately 5 cleaner/team)
	<b>Total</b>	<b>180 (160+20) (approximately)</b>	

The worker/labor requirement above is an estimation and will be confirmed at contract award.

#### Timing of Labor Requirement

Since the disinfecting activities before school re-opening will take place at 1500 (approximately) schools those are located in different corners of the country, technical workers, supervisors and cleaners will be appointed by contracting disinfecting firms. The Direct Workers by the PMU have been recruited. To conduct mentioned disinfection activities, it will take around three (03) months.





### 3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

Considering nature and scale of the project, capacity of the Borrower, anticipated E&S risks and impacts and the context under which this intervention will be implemented, both the Environmental and the Social risk have been assessed as **Moderate**. Specific labor related risks that need due consideration are:

**Civil Works.** There will be no major civil works and hence no construction related impacts are expected.

**Labor Influx.** Labor influx under the project is not expected thus potential labor influx related risks are low (SEA/SH, labor camps, interactions with the local communities, environmental pollution due to waste generation etc).

**OHS.** The disinfection teams will use chemicals to disinfect school premises. Thus, handling, transportation and storage of these material may pose risks to health of the workers. Use of PPE, specific safety training and incidence response due to any contact with chemicals will be put in place by the disinfecting firm as part of their contact with the IAs.

**Exposure to COVID 19** -The workers/ disinfecting teams will work under COVID-19 situation and hence need to maintain national COVID protocols (use of PPE, social distancing, regular check of temperature and other symptoms) needs to be adhered to. Annex 1 provides guidelines in this aspect.

### 4. OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Terms and Conditions of employment is guided by **The Bangladesh Labor Act, 2006 and Amendment 2013** that illustrate the basic conditions of employment which are materially consistent with ESS2. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. This Act also contains:

- Contracts of employment
- Leave entitlements, i.e. annual leave, sick leave, maternity leave and compassionate leave
- The protection of wages (prohibition against unlawful deductions)
- Retrenchment procedures
- Fair and unfair reasons for termination of employment
- Grievance mechanism

Chapter 6 of The Bangladesh Labor Act 2006 (**Safety**) specifically details the safety and working condition of the assigned workers. The salient aspects that this chapter illustrates are:

- **Safety of building and machinery.** It details with the inspection requirement of these installations and actions to be taken if these are found unsafe for workers.
- **Fencing of machinery, machinery in motion, automatic machines.** Details the fencing and safety requirement to be set around dangerous machinery.
- **Floors, Stairs and Passages.** Sets out the construction and setup requirement for safe access and ease of use.
- **Excessive weights.** Illustrates that no excessive weights to be lifted by any worker.
- **Dangerous fumes and explosive and flammable gas.** Details courses of action in case dangerous and explosive gases and fumes are in work area.
- **Personal protective equipment (PPE).** Makes it mandatory to supply workers with quality PPE including helmet, gloves, boot, etc. This is essential given the COVID-19 outbreak.



## Chapter 7 of the same Act (Special Provision Relating to Health, Hygiene and Safety) details:

- **Dangerous operations.** All potentially dangerous operations to be declared and women and children to be barred from such operations.
- **Notice on accident.** Makes it mandatory to report any accident in workplace.
- **Notice on diseases.** If any worker is infected with any disease listed in the Second Schedule of the Act, it is mandatory to notify and the employer is obligated to treat the worker.
- **Restriction to Employ Women Worker.** Lists specific assignments where women may not be employed.

**Communicable Diseases (Prevention, Control and Eradication) Act 2018.** The Act was passed in 2018 and the objective is to protect the people from the national and international spread of infectious diseases, to prevent, control and eradicate such diseases, to issue global alerts and to increase mutual support for the outbreak of the disease, to increase the capacity for precise risk management and to spread related education, to review the progress of diseases, to protect rights including systematic loss.

## 5. RESPONSIBLE STAFF

The summary of responsibility with respect to labor issues is appended below:

**Overall Management.** CSSRP's PMU inter alia the Project Director (PD) has the overall responsibility to oversee all aspects of the implementation of the LMP, in particular to ensure Disinfectant Firms compliance. DPE/DHSE will address all LMP aspects as part of procurement for works as well as during disinfectant firm's induction. The firm is subsequently responsible for management in accordance with contract specific Labor Management Plans, implementation of which will be supervised by PMU on a monthly basis or at shorter intervals as defined by specific Plans. The detailed approach is described in the following sections. The Social and Environmental Specialist will be the focal point of overall management of labor issues.

**Occupational Health and Safety (OHS).** PD must ensure day-to-day compliance with acceptable safety measures and will record safety incidents. Minor incidents are reported to PMU on a monthly basis, serious incidents are reported immediately. Minor incidents are reflected in the quarterly reports to the WB, major issues are flagged to the WB immediately. PMU will include into the contract specific OHS standard requirements that the firm will meet under this project. The standards will be consistent with local regulations, WBG EHS guidelines, COVID-19 Protocols and GIIP. The following OHS standard requirements should be borne in mind:

- Risk Assessment Procedure;
- Rules for hazardous and life-threatening works;
- Emergency response procedure;
- Respiratory prevention to chemical and airborne hazards (including dust, silica and asbestos); Electrical safety (hazardous energies control, safe distance work, wiring and design protection, grounding, circuit protection, arc fault protection, PPE etc); hazards communication; Noise and vibration safety; fire safety; material handling safety;
- PPE and other protective gear including training on usage;

**Labor and Working Conditions.** PMU will ensure compliance with the provision of labor conditions including non-discrimination, wages, safer working conditions etc. PMU will carry out periodic monitoring to ensure that labor working conditions are met as per national legislation. The employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment.





**Worker Grievances.** A Grievance Redress Mechanism (GRM) has been detailed with this LMP including the setup of Grievance Redress Committees (GRC). PMU and the firm will be required to abide by the provisions of the GRM. The Social Specialist will review records on a monthly basis. PMU will keep abreast of resolutions and reflect in quarterly reports to the World Bank. Given the anticipated number of the project personnel/workers the workers' GRM will be a separate document apart from the Project level GRM, though personnel in the committees (GRC) on both the GRMs may have overlapping functions. Reporting Channels for the GRMs may also be same.

**GBV/SEAH, Communicable Diseases.** PMU will be fully responsible to ensure that all workers associated with the project know and are trained on their obligations with respect to avoidance all forms of GBV/SEAH, safe disposal of waste (PPEs etc) and reporting of communicable diseases if they contract any, especially during COVID-19 outbreak situation. Continuous motivation, monitoring and reporting on the same is the responsibility of the PMU Social Staff and the Firm. The PMU will have a monitoring team to ensure the same.

**Additional Training.** PMU is required to ensure that the assigned personnel are adequately trained and briefed with overall safety arrangement, use of equipment (especially PPE), GRM procedure, working conditions of the project. Training on use of PPE, hygiene facilities and behavior, GBV/SEAH and preparation and obtaining signed code of conduct are also their responsibility.

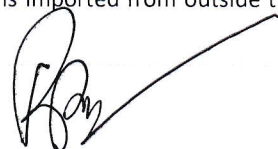
**Code of Conduct and Supervision.** The Disinfectant Firm will develop and implement Code of Conduct (CoC). The CoC will reflect core values and overall working culture, provisions relating to GBV/SEAH, waste management and disease prevention, work ethics and special illustration on COVID-19 protocols. CoCs will have to be understood and signed by all. The content of the CoCs will be included in the Agreement. They will be required to provide the periodic information on the performance in terms of labor, OHS issues. The information will be included in their monthly report and will be reviewed by the PMU.

**Verification, Monitoring and Evaluation (M&E).** M&E will be an integral part of the project under the responsibility of the PMU. Both the IAs will be responsible for managing a common platform, which will be developed to track the project's progress based on the results framework. The platform will support a participatory M&E, which will allow project stakeholders to provide data on project progress. PMU will require the Social Specialist to continuously monitor and verify the project outputs during the entire project timeline.

### **5.1. Specific Responsibilities of Borrower to Address COVID-19 Outbreak before Employing Personnel/Workers:**

The PMU should collaborate with the Disinfectant Firm and other stakeholders to ensure that adequate measures to prevent or minimize an outbreak of COVID-19 have been taken and they have identified what to do in the event of an outbreak. The following guidelines may be followed to ensure measures in addition to those elaborated in Annex 1, including health and safety requirements, are being put in place to address the risks.

- Responsible staffs/ teams/ PD may convene regular meetings with the project health and safety specialists/ medical staff (and where appropriate the local health authorities), and determine the best mitigation measures and convey them to workers
- Where possible, a person should be identified as a focal point to deal with COVID-19 issues. This can be a supervisor or a health and safety specialist. This person can be responsible for coordinating preparation of the sites and making sure that the measures taken are communicated to all, those entering the premises and the local community. It is also advisable to designate at least one back-up person in case the focal point becomes ill; that person should be aware of the arrangements that are in place.
- Communicate and implement COVID-19 related norms as prescribed by the government in the project area by the Firm through training, and targeted interventions relevant to assigned tasks including but not limited to induction training, and training of safety.
- Regular review, coordination, and updates to the plan as COVID-19 outbreak conditions change, including as new information about the virus, its transmission, and impacts become available.
- Prepare a SOP related to receipt of raw materials, accessories, machines, tools, accessories, and any other goods into project premises, including what is imported from outside the country. This should



- include a quarantine and checking area for what is brought into the site/establishment premises.
- Trainings and awareness raising on the COVID-19 related needs of specific workers, including pregnant workers, workers with disabilities and workers with family responsibilities and/or dependents.
- Assure workers about their paid leave entitlements and non-retaliation for taking sick leave for showing COVID-19 related symptoms.
- Provide workers with a list of referrals to essential health services including health care facilities treating COVID-19.
- Actively encourage sick employees to stay home. Promote awareness raising among line managers to avoid penalization of employees for taking sick leave.
- Posting awareness poster with several emergency instructions throughout the factory and distributing leaflet on COVID-19, including information related to health services. If possible use social media, SMS, apps for sharing awareness information.
- Motivating all the employees to maintain personal hygiene in their homes also.
- Inform workers that they can use the existing project grievance mechanism to report concerns relating to COVID-19, preparations being made by the project to address COVID-19 related issues, how procedures are being implemented, and concerns about the health of their co-workers and other staff.

## 6. AGE OF EMPLOYMENT:

In the Bangladesh Labor Act, 2006, Section 34, it is mentioned that no child shall be employed to work in any occupation. Section 44 mentions that anyone under age 14 is considered as child and under 18 but over 14 is considered as adolescent. World Bank strictly prohibits child labor and clearly mentioned that the minimum age of 18 years is required for anyone to get employment in such works. Section 37 of the act suggests a fitness certificate required for adolescents to get employed and they can be appointed to do the light works.

According to the World Bank standards and guidelines, the minimum age of employment for this project shall be 18 years (given the potential hazardous situation posed by COVID-19) and to ensure compliance, all employees will be required to produce National Identification Cards as proof of their identity and age which is the national identification document required for employment.

If anyone employs a person under the age of 18 years, measures to address the same will be taken by PMU.

## 7. TERMS AND CONDITIONS:

The terms and conditions of employment in Bangladesh are governed by the provisions of Bangladesh Labor Act, 2006 in connection with The Control of Employment Ordinance, 1965. The Act makes it obligatory for employers to provide service book containing written particulars of employment, signed by both parties upon employment. For this project, PMU/ Disinfectant Firm will be required to provide all its employees with written particular of employment.

They will also be required to comply with the most current decision of Wages Board assigned by the government, as of December 2018, the amendment of the labor act was implemented regarding the labor wage. The wages can be settled based on local wage rate prevailing at the market but not less than standard wage rate contained in the most current wages regulation issued by the government recommended by the Wages Board Chairman. In this case, written appointment letter with all terms and conditions would be given to the employees.

As a monitoring mechanism, no entity shall be entitled to any payment unless it has filed, together with claim for payment, a certificate: - a) stating whether any wages due to employees are in arrears; b) stating that all employment conditions of the contract are being complied with. It will be a material term of the contract to allow the IAs to withhold payment should they not fulfil their payment obligation to their workers.





## 7.1 Worker's Organization:

The Bangladesh Labor Act, 2006 (Section 176) ratifies the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation and in the Bangladesh Labor Act, 2006, a worker's welfare society holds the right to negotiate the terms and conditions of employment and other related matters and any worker has the right to join the welfare society. Section-119 of this Act suggest collective bargaining agent to negotiate representing the welfare society of workers.

## 8. GRIEVANCE REDRESS MECHANISM:

The Labor Act 2006 **Section 33** provides for the Formal Grievance Procedure in case a worker who has been laid-off, retrenched, discharged, dismissed, removed, or otherwise terminated from employment. Section 202 (**Subsection 24**) describes the responsibilities of a Collective Bargaining Agent (**CBA**) especially bargain with the employer in matters of the conditions of work or environment of work of the workers and conduct cases on behalf of any individual worker or a group of workers under this Act.

However, the PMU will require the Disinfectant Firm to develop and implement a Grievance Redress Mechanism (**GRM**) for their own workforce prior to the start of assignment. They will prepare their own workers' GRM. The GRM must be well circulated and written in a language understood by all. The workers GRM will include:

- A channel to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline that might also be anonymous;
- Stipulated timeframes to respond to grievances;
- A register to record and track the timely resolution of grievances;
- A responsible section/wing/committee to receive, record and track resolution of grievances.

The GRM will be described in the induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response. Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed.
- The Project workers' grievance mechanism will not prevent workers to use conciliation procedure provided in the Labor Act 2006.

A PMU representative will monitor the recording and resolution of grievances, and report these to PMU in their monthly progress reports. The process will be monitored by the GRM Focal Point of PMU (preferably the Social Consultant).

### DETAILS OF GRM STRUCTURE

The Contractor responsible may take the assistance of project Grievance Redress Committee (GRC) that will be formed in PMU by whom the Project will be implemented. This GRC will have overlapping staff function as the Project GRC as mentioned in the SEP. Prior to the start of project activities, PMU officials will confirm establishment of such committees and notify stakeholders including WB Task Team, with the understanding that they will have to meet when complaints are received. As a minimum the composition of the GRC will be as follows:

- Project Director - GRC Chair and Convener



- Social Development Specialist - GRC Committee Secretary
- Two representatives from the Disinfectant Firm worker (One must be female) - GRC Committee members

## STEPS TO A SOLUTION

**Step 1:** The complainant will be advised to first attempt to settle the complaint through the Disinfectant Firm's own grievance mechanism. It will endeavor to solve the problem *within a week*. The problem and solution will be recorded in the Grievance Log.

**Step 2:** If Step 1 fails to resolve the issue, the Project GRC will be involved centrally to solve the issue in question *within 2 weeks* and the complainant will be informed of the timeline to solve the issue. The problem and solution will be recorded in the Grievance Log kept with the GRC.

The complainant will not be barred to seek legal remedies.

Any grievance filed with the GRC, must be reported in the Annual report to the PMU who will then submit a consolidated report to WB. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. PMU and the Firm will maintain the following three Grievance Registers:

**Intake Register:** (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (8) Complainants' story and expectation with evidence, and (9) Previous records of similar grievances.

**Resolution Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

**Closing Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

The PMU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank. The PMU will also prepare periodic reports on the grievance resolution process and publish these on the IAs website.

## 9. PRIMARY SUPPLY AND COMMUNITY WORKERS:

The project is not expected to use any primary supply workers or community workers, as defined by ESS2. However, if primary supply workers are engaged necessary steps will be taken to ensure that no child and/or force labor is involved and OHS requirement for the laborers are followed.

## 10. COMMUNITY HEALTH AND SAFETY:

The PMU shall follow the standards set in World Bank ESS4 to ensure the health and safety of the community. During project activities the sites will be inspected by PMU staffs to assess any risks or hazards associated. After inspection, the competent professionals from PMU shall certify which shall reflect on the risk of adverse consequences posed by the nature and use of the structural elements and the natural conditions of the area.

PMU shall appoint quality management systems to identify and mitigate any risks and impacts that activities supported by the project may have on community health and safety. The spread of COVID-19 should be taken into consideration while interacting with local communities. Social distancing per COVID-19 guidelines between and among workers and community members must be maintained.





**Annex 1**  
**GENERAL GUIDELINE**  
**COVID-19 CONSIDERATIONS IN PROJECT IMPLEMENTATION**

**INTRODUCTION.** The PMU/Disinfectant Firm should identify measures to address the COVID-19 situation. The issues set out below include a number that represent expected good workplace management but are especially pertinent in preparing the project response to COVID-19.

**ENTRY/EXIT TO THE SITE AND CHECKS ON COMMENCEMENT OF WORK**

Entry/exit to the site should be controlled and documented for all, including support staff and suppliers. Possible measures may include:

- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
- Confirming that workers are fit for work before they enter the site. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

**GENERAL HYGIENE**

Requirements on general hygiene should be communicated and monitored, to include:

- Workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular hand washing and social distancing) and what to do if they or other people have symptoms (for further information see [WHO COVID-19 advice for the public](#)).
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring hand washing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where hand washing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.

**CLEANING AND WASTE DISPOSAL**

Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Cleaners in proper hygiene (including hand washing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).

**LOCAL MEDICAL AND OTHER SERVICES**

Given the limited scope of project medical services, the project may need to refer sick workers to local medical



services. Preparation for this includes:

- Obtaining information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).
- Conducting preliminary discussions with specific medical facilities, to agree what should be done in the event of ill workers needing to be referred.
- Clarifying the way in which an ill worker will be transported to the medical facility, and checking availability of such transportation.
- Establishing an agreed protocol for communications with local emergency/medical services.

#### **INSTANCES OR SPREAD OF THE VIRUS**

The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes). These may include the following:

- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.
- Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
- Co-workers (i.e. workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms.
- Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
- If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site and worker groups should be isolated from each other as much as possible.

#### **TRAINING AND COMMUNICATION WITH WORKERS**

Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them.

- It is important to be aware that in communities close to the site and amongst workers without access to project management, social media is likely to be a major source of information. This raises the importance of regular information and engagement with workers that emphasizes what management is doing to deal with the risks of COVID-19. Allaying fear is an important aspect of work force peace of mind and business continuity. Workers should be given an opportunity to ask questions, express their concerns, and make suggestions.
- Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on hand washing and social distancing, and what to do if a worker displays symptoms.

