



THE GOVERNMENT OF SIERRA LEONE

MINISTRY OF LANDS HOUSING AND COUNTRY PLANNING

LABOR MANAGEMENT PROCEDURES (LMP)

SIERRA LEONE LAND ADMINISTRATION PROJECT (SLLAP)

&

SPF: SIERRA LEONE, INNOVATIVE SOLUTIONS FOR LAND DISPUTE RESOLUTION

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ACRONYMS

Acronym	Full Meaning
ACC	Anti-Corruption Commission
AIDS	Acquired Immunodeficiency Syndrome
CERC	Contingent Emergency Response Component
CORS	Continuously Operating Reference Stations
COVID-19	Coronavirus
CSO	Civil Society Organization
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FAO	Food and Agricultural Organization of the United Nations
FSU	Family Support Unit
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HIV	Human Immunodeficiency Virus
ICT	Information Communication Technology
LIS	Land Information System
LMP	Labor Management Procedure
MLHCP	Ministry of Land Housing and Country Planning
NASSIT	National Social Insurance Trust
NLP	National Land Policy
OHS	Occupational Health and Safety
PCU	Project Coordination Unit
PPE	Personal Protective Equipment
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SLLAP	Sierra Leone Land Administration
SPF	State- and Peace-Building Fund
ToR	Terms of Reference
TWG	Technical Working Group

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1.0 INTRODUCTION

These Labor Management Procedures (LMP) are intended to provide the framework to address the labor risks and impacts that are anticipated to occur as a result of the implementation of the Sierra Leone Land Administration Project (SLLAP) and the related State- and Peacebuilding Fund (SPF) for: Sierra Leone, Innovative Solutions for Land Dispute Resolution project (SPF Project). The LMP sets out a formal system by which the Ministry of Lands, Housing, and Country Planning (MLHCP), and Food and Agricultural Organization of the United Nations (FAO) for the activities related to SPF, together with stakeholders including the Ministry of Labour and Social Welfare and sub project contractors will manage and implement mitigation measures to avoid or reduce the severity of labor related impacts on workers, community health, safety and security. During project implementation, project sub-contractors will use this LMP as a guide to prepare specific labor management plans to address the specific labor risks and impacts of their activities.

1.1 Purpose and Scope of the Labor Management Procedure

The purpose of the LMP is to protect the health, safety, rights, and wellbeing of all categories of workers who will be engaged during the implementation of SLLAP and the SPF Project. It is also intended to promote equal opportunity and non-discrimination in the management of the workforce taking into consideration both national and international labor laws and requirements including the World Bank's Environmental and Social Standard Two (ESS2) on Labor and Working Conditions.

The scope of this LMP covers activities in each project that will require the use of labor, especially where new construction and rehabilitation works will be undertaken. It is applicable to all types of project workers, skilled and unskilled, and deals with all aspects relating to recruitment, labor and working conditions, management of worker relationships and Occupational Health and Safety (OHS) as well as work-based grievance redress mechanisms. The LMP also includes measures related to the management of workers engaged by third parties or contractors and sub-contractors, and also the management of workforce-related risks within the supply chain.

1.2 Objectives

The LMP seeks to achieve the following objectives:

- i. Establish arrangements to appropriately manage and protect the OHS and welfare of workers including both employees and contractors and others who may be exposed to risks associated with civil works and related activities;
- ii. Ensure that employees understand their rights in relation to labor and working conditions;
- iii. Allow employees to exercise their right to freedom of association and collective bargaining;
- iv. Ensure compliance with national employment and labor laws and regulations;
- v. Provide project workers with avenues to raise concerns, register grievances and seek redress and receive feedback and any associated corrective action;
- vi. Promote equal opportunities for all workers by preventing discrimination in hiring, remuneration, access to training, on the grounds of race, nationality or social origin, birth, religion, disability, gender, age, sexual orientation, union membership, and political opinions;
- vii. Manage disciplinary practices and grievances in a manner that treats those affected individuals with respect and dignity and without threat, abuse or ill-treatment;
- viii. Prevent the use of child, forced or compulsory labor in project activities; and
- ix. Prevent Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) as well as Gender-Based Violence (GBV) that may arise as a result of implementing activities or sub projects under SLLAP or the SPF Project.

2.0 ASSESSMENT OF KEY LABOR RISKS AND IMPACTS

2.1 Project Descriptions

SLLAP

The Sierra Leone Land Administration Project (SLLAP) seeks to establish a transparent and efficient land administration system by addressing critical challenges within the land sector in Sierra Leone. The challenges to be addressed include: i) weak institutional and technical capacity in the delivery of cadastral and registration services; ii) weak legislative framework in land administration and management; iii) tenure insecurity and inefficiency in land/property transactions; iv) increasing and unresolved land disputes within the statutory and customary tenure systems; iv) gender inequality relating to access to and control over land resources; and v) limited investment in the land sector, particularly from the private sector.

SLLAP has five (5) components:

Component 1: Institutional Development and Legal Reform — The main objective of this component is to strengthen Sierra Leone’s institutional framework for land administration by supporting buildings, operations, strategies, capacity, and sensitization. Activities under this component will support the funding required for office building or renovation (in Freetown, Bo, Kenema, Makeni, and Port Loko districts) and supply of furniture, equipment, vehicles, and initial operating cost. Decisions will be made concerning the locations of offices and what local buildings and facilities to use. Once this is done, necessary site locations, architectural drawings, building approvals, site-specific Environmental and Social Management Plans (ESMPs) will be prepared.

Component 2: Development of a Land Information System — The Project will finance required Information Communication Technology (ICT) equipment, design, and development of Land Information System (LIS) with automated land administration processes (that need review and simplification) and digitization of deeds and cadastral maps. To ensure that data ownership in LIS is linked to cadastral boundaries, the Project will finance procurement of high-quality orthophoto or satellite imagery. Further, the component will finance the establishment of a geodetic network through location measurements of existing ground control points and installation of Continuously Operating Reference Stations (CORS) on top of existing government-owned buildings in Freetown and in some of the provinces. The activities under this component will not lead to any potential resettlement.

Component 3: Recording and Registration of Land Tenure Rights — The primary focus of this component is to improve the quality and completeness of the records of land tenure rights and the ease and security with which these rights can be transferred whether by inheritance, sale, lease, or some other third-party rights. This will involve both recordings of the locations of these rights (mapping the parcel) and assessing the legal and legitimate rights to these parcels in line with National Land Policy (NLP) goals and principles. The activities will seek to make the land registration and surveying of parcels more efficient and trustworthy and to ensure that the public is keen to utilize it to protect property rights. The component will finance initial pilot activities for participatory survey and recording of customary land rights with scale-up activities planned in selected priority areas. While the activities might unearth existing land disputes between private parties, the demarcation activities will not lead to resettlements. The identified disputes will be dealt with through other social safeguard instruments, including a Grievance Redress Mechanism (GRM).

Component 4: Project Management — This component will finance all expenses required to ensure efficient and transparent project management and coordination. This will entail in particular the financing of Project Coordination Unit (PCU) staff at MLHCP, facilitation of meetings of Project Steering Committee, and facilitation of Technical Working Group (TWG) meetings and consultations.

Component 5: Contingency Emergency Response Component (CERC) — The CERC is a zero-sum component included to mitigate situations of urgent need and allows for the rapid reallocation of funds in the event of a natural

disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact.

SPF Project

The Project Development Objective of the SPF Project is to pilot innovative approaches for reducing fragility and conflict in the context of the land administration reform process and build capacity among land sector CSOs to support communities and land governance in Sierra Leone, with particular emphasis on the needs of women, persons with disabilities, youth and other disadvantaged and vulnerable populations in Sierra Leone. The SPF Project has four components:

Component 1: Strengthening women's land rights through piloting Gender Transformative Approaches.

This component promotes gender equality in access to land and other natural resources through innovative Gender Transformative Approaches (GTAs)¹ to identify and address the root causes of gender inequalities and structural barriers to women's land and resource rights. The component will promote locally generated and context-specific strategies that work across multiple levels with a variety of partners and stakeholders to foster transformative changes. This component will finance initial research to understand how women's land rights are affected by laws and traditional norms, including inheritance, but also how women's participation, decision making, and leadership rights are realized. Based on the research results, the component will finance the development and implementation of an awareness raising campaign on the underlying causes of gender discrimination, the importance of gender equality and women and girls' empowerment. By using GTAs, the component will foster inclusive dialogues at the household and community level to trigger reflections on and change of discriminatory social and gender norms and perceptions on gender roles and identities that hold women back despite the new land laws. This will be done by using and evaluating innovative approaches, tools, and technology, such as Talking Books (audio devices that can play and record messages, targeting people with low literacy skills). Activities will include co-creation processes with representatives from the communities, community leaders and national experts to translate the project's communication strategy into specific Talking Book content including highlighting real life and fictional role models.

Further, the component will finance the design and implementation of a leadership capacity building program for women leaders, traditional and religious leaders, CSOs, young women and girls, men and boys, women's organizations, and local media to reinforce their capacities, either individually or collectively, to advocate for women's land rights. This includes piloting the design and implementation of the very first generation of training programs for women to support them in taking up roles in new land institutions such as Chiefdom, Town and Village Area Land Committees created by the new land laws. Activities will support the development, piloting and fine-tuning of a gender-responsive capacity building program tailored to the learning needs of the local stakeholders, to help them understand and effectively engage with new land laws including in the process of securing customary land rights.

Component 2: Improving the functionality and gender responsiveness of the land dispute resolution system.

This component will improve the functionality of and promote better integration between formal and informal land dispute resolution mechanism and institutions. The component seeks to promote innovative and gender responsive Alternative Disputes Resolution (ADR) mechanisms with the goal of improved access to legal support and legal aid institutions for women, men, and communities. The project will finance an analysis of the nature and extent of land disputes, and available dispute resolution mechanisms, and legal aid support (accessibility, strengths, and weaknesses) vis a vis the requirements of new land laws. Building on the analysis, the project will finance the design and piloting of a program to increase the capacities of representatives of formal and informal land dispute resolution mechanisms by using innovative gender-responsive and inclusive participatory approaches to resolve land disputes in the context of the new land laws. The program will be providing tailored gender and law sensitization training to

¹ See for example FAO (2020): Gender transformative approaches for food security, improved nutrition, and sustainable agriculture. A compendium of fifteen good practices.

build the capacity of judicial and law enforcement institutions, which have not been targeted in previous interventions in this context. This is to reinforce the capacities of such institutions to act in line with the new land laws and to respond to landowners' and users' needs, particularly the most vulnerable. The results will feed into the development of a training manual.

Component 3: Promoting innovative governance arrangements for stakeholder dialogue and improved land governance. This component will finance the implementation of innovative strategies and governance arrangements that foster collaboration, transparency, and sustainable management of land resources. This component will finance an institutional and political economy analysis at the sub-national level, aimed at unpacking power relations, interests and influence in the land sector, stakeholders' capacities and skills as well as capacities to act collectively. The analytics will use a participatory, multistakeholder and innovative governance analysis framework.² Based on the political economy analysis, the component will finance the establishment of Local multi-stakeholder platforms (MSPs), composed of local government, traditional authorities, Village Area Land Committees, Chiefdom Land Committees, CSOs as well as the private sector. Building on the successful experience of the national VGGT TWG, the local structures would support gender responsive land governance reform processes at the decentralized level through policy dialogue, conflict prevention, and defining local priorities, towards increased resilience. Knowledge generated at this level, would feed into the national VGGT TWG. One example of a beneficial outcome is that local MSPs would provide an entry point for a new and innovative stakeholder dialogue by involving medium-sized national investors who have largely been left out of activities aimed at achieving responsible land-based investment.

Component 4: Bank-Executed Grant Implementation Support. This component would provide technical support from the World Bank to the grant's implementing partners to ensure compliance with World Bank policies and procedures as well as coordination of activities with the Sierra Leone Land Administration Project (SLLAP, P177031). SLLAP does not provide any services for dispute resolution beyond the clarification of land parcel boundaries, while other forms of land disputes (e.g., intra-family inheritance disputes) exist. The proposed activities would therefore complement SLLAP. Trainings for women in new land sector institutions need to be newly developed and tested as no experiences with these new institutions exist. Once this is done, SLLAP could potentially adopt and scale up any successfully tested approaches. SLLAP will further benefit from the local level land sector dialogues, which are not supported under SLLAP as these require local level interventions of local level actors, such as local CSOs.

2.2 Overview of Labor use in the Projects

It is envisaged that the projects will recruit different types of workers including direct, contractor's workers, suppliers, primary workers, and community workers to implement and supervise project activities labor use by components are listed below:

SLLAP

- Component 1: The project will hire local construction companies to carry out construction or renovation of office buildings both in Freetown and the four Provincial capitals of Bo, Kenema, Makeni and Port Loko. This will also involve the supply of furniture, equipment, vehicles, and initial operating costs.
- Component 2: Development of a Land Information System. This activity will also involve procurement and installation of Land Information System (LIS) and scanning of documents would require hiring staff to be hosted in Freetown but will not require labor within communities. The establishment of a geodetic network through location measurements of existing ground control points and installation of Continuously Operating Reference Stations (CORS) will require international specialists and MLHCP counterparts to install the CORS stations. It will also require primary suppliers of ICT infrastructure and expertise The contractors are expected to recruit locals for the unskilled labor.

² See for example FAO (2022): Focus on governance for more effective policy and technical support. Framework paper.

- Component 3: Recording and registration of land tenure rights. This component will require participatory processes and involve a large cadre of people (surveyors, consultants, MLHCP staff etc.) to visit, raise awareness, discuss with owners about their land and rights and to undertake surveys and prepare documents for the demarcation and registration activities. Community workers may be needed to support participatory land mapping, recording and registration and land dispute adjudication. This Staff for this intervention will be spread out across several intervention areas and there will be no concentration of large outside project staff at any given point in one location. It is anticipated that field work teams will be below 10 members at a given point in a given location, which includes community members.
- Component 4: Project Management. The Borrower will set up a PCU at the headquarters and district offices that will be composed of civil servants and full and part-time consultants directly hired in accordance with national law and the requirements of ESS2 regarding “direct workers.”

SPF Project

Under all of the components the majority of workers will be employees of CSOs who will be largely responsible for project activities. CSOs are likely to utilize their own staff and retain full and part-time consultants as necessary. Community workers may be needed for community outreach and related activities. Workers of various categories will conduct research, awareness-raising, and training. FAO will utilize its own staff and part-time consultants. FAO shall require sub-contractors and implementing partners with whom it will conclude contractual arrangements for implementing the project activities to comply with the environmental and social requirements under FAO’s legal framework and the particular substantive requirements contained in the LMP. FAO also shall engage a social specialist or have an assigned person to liaise with CSOs, SLLAP and the World Bank to ensure the implementation of environmental and social activities at FAO and CSO levels and report the same to the Bank.

2.3 Number of Project Workers

The projects will involve a large number of workers, but total number of workers by category in either project cannot be estimated at this stage. However, the category and characteristics of workers envisaged under the project are described in the next section.

2.4. Characteristics of Project Workers

The LMP applies to all workers directly engaged by the projects whether full-time, part-time, casual, or seasonal, contracted, and primary supply workers. The type of workers to be engaged in the projects will include skilled labor like engineers, surveyors, and enumerators as well as semi-skilled labor such as drivers, and construction equipment operators, together with unskilled labor such as construction workers (laborers, site security personnel, and so on). It is expected that the projects will engage the following categories of project workers as defined by ESS2:

a. Direct Workers

Direct workers would likely include project management staff at MLHCP, who will be directly involved in the day-to-day management and monitoring of project and sub projects. Activities of direct workers would also include staff of selected MDAs who would be assigned additional responsibilities on the project or on secondment duties on the project sites. Another category of direct workers will be consultants who will be hired to provide specialized skills and expertise in certain disciplines including environmental and social consultants and auditors. These consultants will be hired under individual contracts, on a part-time or full-time basis, with specific terms of reference and responsibilities. They will be involved in design and construction supervision of the infrastructure.

b. Contracted Workers

Project Contractors, including CSOs in the case of the SPF Project, may engage sub-contractors or employ workers to undertake aspects of the various assignments under the project. Based on the requirement in every component of SLLAP, the PCU will employ contractors who will hire contracted workers based on their level of skills and needs. FAO or CSOs may do the same for the SPF Project. Sub-contracts of activities could also be done with the approval of the PCU or FAO. Sub-contractors recruited may supply laborers as per terms and conditions of the agreement with PCU or FAO. Contracted workers are eligible to work for a fixed contract period approved by the PCU of FAO and then recruited by the Contractor. Their contracts will be renewed depending on satisfactory performance and on the basis of needs.

c. Migrant Workers

The projects do not expect to hire foreign migrants as part of the civil works. However, international consultants may be engaged to provide specialized services where local expertise is not readily available. Within Sierra Leone, sub-project Contractors may move skilled and semi-skilled labor from one sub-project location to another or may use labor outside the project communities in the execution of works.

d. Women Workers and Other Marginalized Workforce

MLHCP, FAO and CSOs will be encouraged to employ as many women as possible into the projects by ensuring certain jobs are reserved for women and persons with disability to ensure inclusive labor management processes.

e. Primary Supply Workers

Primary Supply Workers will consist of employees of primary suppliers both foreign and local who will provide a range of supplies including ICT equipment and construction materials sourced both locally and abroad. These entities will constitute primary suppliers under the projects and all their workers involved on the projects will be required to adhere to the provisions of this LMP. Appropriate, specific requirements on child labor, forced labor, and work safety issues will be included in all purchasing orders and contracts of to ensure that no children are recruited and supplied as worker and that the workers are not subject to “forced labor” and any serious safety issues.

f. Community Workers

It is anticipated to use community workers to support in community outreach, training programs, participatory land mapping, recording and registration as well as help in land dispute adjudication. Community Workers may also be engaged by the surveyors and consultants during the surveys and by CSOs or consultants in conducting research, awareness-raising, and training. The project will use simple GPS enabled mobile devices with satellite imagery preloaded on the devices and as good practice will train community members in using these devices to walk boundaries with neighbors and collect (1) parcel boundary information and (2) ownership information. The roles and terms of engagement will be clearly communicated and documented. Measures relating to OHS, child and forced labor will be relevant and enforced.

Timing of labor requirements

The direct workers will generally be required full- time and throughout the year for the project duration. They will be engaged from the beginning of the project. Government civil servants from various relevant line ministries deployed to work directly on the project may be required to work full-time or part time depending on the roles and responsibilities assigned under the project. Contracted workers including civil works contract workers, professional capacity building experts, researchers, outreach workers, and primary supply workers will be required as per the need and exact timing is undetermined at the moment. Contractors for infrastructure activities will mobilize the labor force to coincide with type of work and season. Timing and duration of employment of contracted workers will be known at later stages, however, they will only be engaged for the duration of respective subcomponents which will not overrun the overall project implementation schedule.

2.5 Assessment of Key Potential Labor Risks

The potential project activities are briefly described in Section 2.1. The key labor risks associated with the implementation of these activities are discussed below.

Risks Associated with Hazardous Work

Certain activities at the construction/rehabilitation sites will likely expose the workers to certain hazards. Some of the hazardous manual tasks include lifting, lowering, pushing, pulling, carrying which require sudden use of force, repetitive movements, and awkward posture. Others include lifting, carrying and/or pushing cement, sand and other construction materials, mixing of concrete and other activities as well as lifting heavy construction equipment like generators, doors and windows may involve situations that put undue stress on the waist, central spine and other body parts of site workers. Workers who use heavy hammers and power drillers at construction sites may also suffer from hazards to their bodies as a result of repeated and prolonged execution of the tasks.

Sprayers, painters, laborers and steel benders working on the construction and rehabilitation sites may also be exposed to emissions, dust and naked oxy acetylene flames respectively during treatment of wood to be used as roof members and form work, painting as well as cutting and welding during the construction or rehabilitation of the selected project facilities. During mixing and carting of concrete and masonry, concrete may also splash into the eyes of the workers involved in the aforementioned activities. Similarly, dripping paints, oils and lubricants from high elevation may come into contact with the eyes of site workers, adversely affecting the eyes. These incidents may lead to immediate or long-term visual impairment and/or blindness.

The health risks associated with hazardous tasks under the project will be limited to site workers for loading and off load building materials and equipment.

The SPF Project does not involve hazardous work.

Incidence of Work-Related Accidents

Accidents may occur during the construction and rehabilitation works leading to injuries and potential loss of life involving employees of Sub Project Contractor, their Sub Contractors and suppliers as well as employees of the selected facilities to be rehabilitated or constructed. Common accidents related to civil and rehabilitation works will include burns, cuts, slips and falls resulting from poor housekeeping and signage on site, installation and operation of equipment. Other causes of work-related accidents are failure to adhere to equipment manufacturers' specifications and the use of Personal Protective Equipment (PPE).

Poor Conditions of Service

Sub Project Contractors and suppliers may practice unfair/discriminatory recruitment practices (e.g., against women) and may attempt to subvert the national labor laws with practices such as paying wages lower than the national minimum wage, asking workers to work overtime without pay, denying women maternity leave and corresponding allowances and employ persons without formal contracts.

Incidence of Child/Forced Labor

Sub Project Contractors, their sub-contractors and suppliers may recruit unqualified or under aged persons to work on site and other related activities. The risk of child labor will be mitigated through prohibition of employment of persons below age 18 years. Measures to prevent employing or engaging children under this age will include reviewing national Identification Card, and Birth Certificate or other documents. Where these are not available, community verification demonstrating age will be undertaken. Awareness raising sessions will be conducted regularly to sensitize on prohibition and negative impacts of child and forced labor. The PCU and FAO will ensure that all sub project contractors provide signed written employment contracts for all workers upon hiring to ensure each worker consent to the terms and conditions of the employment before commencement of work. Periodic monitoring will also be carried out by the PCU or FAO with support from the Ministry of Labor and Social Security to ensure that no incidences of child and forced labor exist at the project sites.

Exposure to Infectious Diseases

Workers get infected with COVID-19 which is still a major health issue leading to morbidity and mortality in the line of duty. The LMP is guided by the National COVID-19 guidelines and the World Bank's "COVID-19 Considerations" and the Technical Note on "Public Consultations and Stakeholder Engagement".

Incidence of Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

This takes into consideration construction-related SEA/SH risks, land registration-related SEA/SH risk and SEA/SH risks arising in the context of conducting research, training, or awareness-raising activities. Given that some of the investment will be implemented in poor communities with increased income from construction/rehabilitation work, coupled with search for employment and procurement opportunities, the risk of SEA/SH may be heightened. SEA/SH could also occur in the process of land registration where project actors with power over the registration process could exploit vulnerable beneficiaries. Similarly, project actors may engage directly with beneficiaries in land mapping and assessment, research, training, or awareness-raising activities with limited supervision such that SEA/SH can also be a significant risk. The projects have conducted a SEA/SH risk assessment and developed a GBV Action Plan. Details of the action plan will include service provider mapping, GBV sensitive channels in the GRM, Contractor code of conduct, worker training, community sensitization and an Accountability and Response Framework. The GBV Action Plan will also apply to SPF activities.

Accidents involving Contractors and Suppliers Trucks and Equipment

Haulage and trucks and equipment belonging to Project Suppliers, Sub Project Contractors and Sub-Contractors may be involved in accidents leading to the loss of life and property, injuries, and spillage of materials within project catchment communities and along haulage routes. The SPF Project presents some risk of work-related accidents from travel by road.

3.0 LEGISLATION AND REQUIREMENTS ON LABOR AND WORKING CONDITIONS

3.1 National Legislations on Labor and Working Conditions

Table 1 presents the relevant legislation on labor and working conditions.

Table 1: National Legislation on Labor and Working Conditions

Legislation	Relevant Sections
The Constitution of Sierra Leone	<p>The Constitution of Sierra Leone protects the freedom of association and promotes health and safety at work, fair working conditions, equal pay for equal work, and fair compensation. Chapter 2 subsection 8 of the Constitution of Sierra Leone states that the state shall direct its policy toward ensuring that. Under the Constitution:</p> <ul style="list-style-type: none"> • Every citizen, without discrimination on any grounds whatsoever, shall have the opportunity for securing adequate means of livelihood as well as adequate opportunities to secure suitable employment (right to work); • Conditions of service and work are fair, just, and humane and there are adequate facilities for leisure and for social, religious, and cultural life (right to rest and leisure); • The health, safety, and welfare of all persons in employment are safeguarded and not endangered or abused, and in particular, special provisions are made for working women with children, having due regard to the resources of the state (right to safe work environment and equal pay). • There is equal pay for equal work without discrimination on account of sex, and adequate and satisfactory remuneration is paid to all persons in employment (the right to equal pay for work).
The Employment and Labour Law 2020	<ul style="list-style-type: none"> • The law consolidated existing laws relating to labor, employers, trade unions and industrial relations. The Act covers common issues in employment and labor law regulations such as terms and conditions of employment, employee representation and industrial relations, discrimination, maternity and family leave rights and business sales. It provides for the rights and duties of employers and workers; legal or illegal strike; guarantees trade unions and freedom of associations and establishes the Ministry of Labour to mediate and act in respect of all labor issues. The Act explicitly states that it is the duty of an employer to ensure that every worker works under satisfactory, safe and healthy conditions.
Regulation of Wages and Industrial Relations Act 1971 (No. 18)	<ul style="list-style-type: none"> • These regulations specify the collective agreement between Employers in the Building and Construction Trade Group in the Republic of Sierra Leone involving the following Workers Unions: <ul style="list-style-type: none"> ○ Artisans, Public Works, and Services Employees Union; ○ General Construction workers Union; ○ Skilled and Manual Production workers Union; and ○ Sierra Leone Union of Securities, Watchmen and General Workers Union • The Regulation of Wages and Industrial Relations Act 1971 (No 18) places wage negotiations under the Trade Group Council. Wages which are to be negotiated every three years under this Act. • Conditions of Service issues including Hours of Work (Clause 9), modalities for payment of overtime (Clause 13), Annual Leave and Leave Allowance (Clause 15) and Maternity with full pay for maximum of twelve weeks (Clause 17), Dirty Work Allowance for workers who come into contact with sewerage, rubbish, wood, dust and toxic materials (Clause 56) and Termination of Works Contract (Clause 26) are outlined explicitly in the Act. • Health and Safety issues are covered under Clause 37 and 51 of this regulation. They include the Employer providing raincoats, goggles, welding masks, helmets and other safety gear as

Legislation	Relevant Sections
	well as toilet and hand washing facilities for employees. Workers' right to form unions and engage collective bargaining are recognized in Clause 30 while right to representation is conferred on workers under Clause 32.
The National Social Insurance Trust (NASSIT) Act 2001	The NASSIT Act 2001 covers benefits and pensions for all sectors. Section 24(1) stipulates that regardless of the existence of a private/company pension or provident fund, employers and employees are subject to the NASSIT Act. It is expected that all workers in the project will be treated in conformity to the requirements of this Act.
The Public Health Ordinance, 1960	<p>This Act remains the principal piece of public health-related legislation in Sierra Leone. The Act places sanitation management, premises inspection, environmental hygiene, designation of sanitary sites under the remit of the Ministry of Health and Sanitation and by extension the Health Authorities at the local level. Part III (2) of the Ordinance: Statuary Nuisance, among other empowers the Health Authority to summarily cause the removal of:</p> <ul style="list-style-type: none"> • any collection of water or any water vessel, found to contain eggs or larvae of mosquitoes, or any premises, on which conditions whether natural or artificial are likely to cause the propagation or harboring of mosquitoes; • any well, tank, cistern, or water-butt used for the supply of water for domestic purposes which is so placed, constructed or kept as to render the water therein liable to contamination prejudicial to health; and • any well, tank, cistern, or water-butt used for the supply of water for domestic purposes which is so placed, constructed or kept as to render the water therein liable to contamination prejudicial to health.
The Factories Act of 1974	<p>The Factories Act, 1974 demands for all aspects of cleanliness, reports of all injuries, accidents, diseases and death. Under this Act the Factories Inspectorate Department under the Ministry of Labour and Social Security has the power to monitor workplace compliance in terms of labor laws, especially among factories, and enforce measures to ensure occupational accidents and diseases are minimized within the work environment (Section V of the Factories Act, 1974). The Act expands the definition of factories to include construction sites. It makes reports of accidents, death, injuries and the outbreak of diseases mandatory (Section VII) and empowers the Factory Inspectorate Department to enforce general health and safety conditions within factories. There are also sanctions for non-compliance including fines, jail terms and prohibition of works and closing down of factories.</p> <p>The Act promotes cleanliness, health and safety within the work environment and covers owners, occupiers, supervisors and workers alike and establishes accident and incident reporting a responsibility of factory operators (owners/managers)</p>
Motor Vehicle (Third Party Insurance) Ordinance, Cap 133	This Act makes it an offence to operate a vehicle without at least a third-party insurance cover and specifies sanctions for offenders (Section 3). According to the Act no motor vehicle will be licensed until it is insured.
Road Traffic Act, 2007	The Act ensures public and road safety. Various offenses under this Act are punishable by spot fines, and imprisonment or both. By the Act, driving unlicensed vehicles, defective vehicles or overloaded vehicles are offences. Part III of the Act, Licensing of Drivers, makes driving without a valid license corresponding to the class of vehicle an offence. Part III also specifies the age limit for driving various categories of automobiles, starting from above eighteen (18) years for private cars and good and service trucks to above 21 years for public service vehicles and heavy-duty trucks (Part III Section 2). Dangerous and careless driving, driving under the influence of alcohol and drugs have been specified as offenses under this Act. In addition, Section 120 and 121 under Part XI –

Legislation	Relevant Sections
	Restrictions on Road use for Road Safety, provides areas, including along footpaths and places reserved for persons with disability, where parking is prohibited.

3.2 Other Relevant Legislations and Policies

A summary of other legal requirements applicable to the LMP is presented below:

Child Rights Act, 2007

Part III of the Act talks about the Employment of Children. It stipulates the minimum age at which free education ends when children can engage in full time employment or apprenticeship at fifteen (15 years) though the Act allows children to engage in light work (non-strenuous and non-hazardous work) at the age of thirteen (13) but only persons eighteen (18) years and above can engage in hazardous work such as civil works. The Act which prohibits children from working at night also set conditions for apprenticeship.

Persons with Disability Act, 2007

Per Section 24(2) of this Act, public buildings/facilities that are accessed by the general public are to be disability friendly, while Section 14(2) enjoins government to adapt existing structures to enhance access by persons with disability. In Section 20 and 21 of the Act, it is an offence to deny a person contracts and employment opportunities on the basis of disability.

Prevention and Control of HIV and AIDS, Act 2007

The Act seeks to control the spread of HIV-AIDs and prevent discrimination against Person Living with HIV/AIDS. Prevention and Control of HIV and AIDS, Act 2007 enjoins government to create awareness about the mode of transmission and support for Person Living with HIV/AIDS. Section 23 establishes that discrimination of Persons Living with HIV/AIDs in terms of access to employment, health services and education as an offence, while Section 11 also prohibits testing for HIV/AIDS as a condition for gaining employment. Section 21 also makes deliberate or reckless transmission and non-disclosure of HIV/AIDS positive status prior to sexual encounter an offence.

The National Workplace HIV/AIDS Policy

The broad objectives of the policy among others, are to provide protection from discrimination in the workplace to people living with HIV and AIDS; prevent HIV and AIDS spread amongst workers; and provide care, support and counselling for those infected and affected.

Sierra Leone Local Content Policy of 2012

The Local Content Policy is aimed at promoting growth and development of the domestic private sector by creating linkages with the large domestic and foreign firms through the utilization of local resources and products, and to promote the integration of the Sierra Leoneans in all economic activities. It also encourages sectoral policies and projects to promote the utilization of locally available Sierra Leonean goods in the industrial and manufacturing sectors as well as support the growth of small and medium enterprises through targeted Government procurement and promote a culture of local ownership and participation in aspects of productive work.

The Domestic Violence Act, 2007

This Act addresses all types of violence in a domestic setting with the aim of suppressing domestic violence and also to provide protection and support for the victims of domestic violence and other related matters.

The Sexual Offenses Act, 2012

The Act defines consent as an agreement by choice with the person having both the freedom and the capacity to make that choice. Persons under the age of 18 years are not capable of giving consent under the Act. Marriage can also not be used as a defense against violations of the Act, effectively prohibiting forced sex in marital relationships. The Act protects children, especially girls, from being abused by teachers, as well as traditional and religious

leaders. It also increased the minimum jail sentence for sexual violations from two years to between five and fifteen years.

Devolution of Estates Act, 2007

The Act is also known as the 'Intestate Succession Act' and it provides protection for surviving spouses especially women, children, parents, relatives and other dependents of testate and intestate persons and provides for other related matters. The Act also makes provision with respect to intestate succession and succession by will of estates including land and land-related rights and sets out rules relative to inheritance and related distribution of estates in the case a person dies without having made a will. The Act also defines offences against persons entitled to inheritance or related to the deceased person.

The Registration of Customary Marriage and Divorce Act, 2009

The Act provides the framework for the registration of customary marriages and divorces. It also provides further economic and legal protection for women and other related matters.

3.3 Environment and Social Standard Two (ESS2): Labor and Working Conditions

This LMP is prepared in line with the requirements of ESS2: Labor and Working Conditions. It ensures a safe, healthy conducive working environment for workers in which the working environment is free of forced and child labor as well as other forms of intimidation and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law. The standard also seeks to protect vulnerable workers such as migrant labor. The requirements of Labor and Working Conditions (ESS2) extends to direct, indirect, community and contracted workers as well as primary supply workers on a Bank financed project.

3.4 International Laws and Conventions

A total of 35 International Labor Organization Conventions have been ratified by Sierra Leone.

- i. Fundamental Conventions: 8 of 8
- ii. Governance Conventions (Priority): 2 of 4
- iii. Technical Conventions: 25 of 177

Out of 35 Conventions ratified by Sierra Leone, of which 30 are in force, 5 Conventions have been denounced and none have been ratified since the United Nations Convention on the Rights of the Child in 1991 and ratification of the conventions on Worst Forms of Child Labor Convention (1999) and the Minimum Age Convention (1973), both ratified in June 2011.

Sierra Leone also ratified the African Charter on the Rights and Welfare of the Child in 2002 which is being enforced to protect the rights and welfare of children in Sierra Leone.

4.0 POLICIES AND PROCEDURES FOR LABOR IMPACT MANAGEMENT

4.1 Terms and Conditions of Employment

The Project Coordination Unit or FAO, in the case of the SPF Project,³ will ensure that:

- Workers work for 8 hours a day from 8.00 am to 5.00 pm with an hour's break five (5) days a week unless otherwise agreed between the employer and the workers
- The Conditions of Service and collective bargaining agreements for construction and related workers including artisans, watchmen and waste handlers are in line with the provisions of the Regulation of Wages and Industrial Relations Act 1971 (No 18). The Act provides for Conditions of Service issues including Hours of Work (Clause 9), modalities for payment of overtime (Clause 13), Annual Leave and Leave Allowance (Clause 15) and Maternity with full pay for maximum of twelve weeks (Clause 17), Abuse Language on Site (Clause 73), Protective Clothing (Clause 37) Dirty Work Allowance for workers who come into contact with sewerage, rubbish, wood dust and toxic materials (Clause 56) and Termination of Works Contract (Clause 26) among others
- Wages negotiated every three years as stipulated in the Act.
- Sub Project Contractors and Sub-Contractors provide signed written employment contracts for all workers upon hiring.
- Sub Project Contractors inform hired workers of all employment related information and ensure that the workers understand the rights and obligations of both parties under the contract.
- Workers know the standards of conduct expected of them. A written policy manual (Code of Conduct) specifying the rules and procedures will be issued and made readily available to all workers as part of the labor contract. The Code of Conduct will be explained to workers who are not literate in English in a Language they understand.
- Employees of Sub Project Contractors, Sub Contractors, Consultants and Primary Suppliers (skilled and unskilled or casual labor) are paid living wages which are not below the current minimum wage.

4.2 Non-discrimination and Equal Opportunity

MLHCP, FAO and project consultants shall monitor discriminatory practices not only in hiring procedures but throughout all stages of employment. To avoid any discrimination:

- Sub Project Contractors and their Sub Contractors shall treat workers equally and fairly with respect to all policies, conditions and benefits of employment.
- Sub Project Contractors and their Sub Contractors must ensure that employment decisions are based on relevant and objective factors (merit, experience, tasks, skills, etc.), and that consistent procedures are followed in the decision-making processes.
- The company/employer should also ensure that its workers and suppliers are aware of its policy on non-discrimination and equal treatment in order to promote a culture of respect and zero-tolerance for discrimination.
- The contractors should ensure that adequate mechanisms are in place for workers to report on workplace discrimination, bullying or sexual harassment. These mechanisms should be able to promptly investigate all complaints and take appropriate preventive or disciplinary action.
- All workers must be informed of their rights and encouraged to use the mechanism without fear of reprisal. MLHCP, FAO as well as Sub Project Contractors and their Sub Contractors shall designate specific staff (e.g., a workers' representative) to act as the workers' focal point on employment discrimination issues.

³ For the SPF, FAO will include the requirements of this section in Letters of Appointment/ bidding documents and ask CSOs for regular reports on the implementation of these requirements.

Workers should be able to report discriminatory incidents to the focal point on a confidential basis. At the same time, the focal point should possess adequate knowledge to advise workers on national laws and contractor/employer policies regarding non-discrimination and the various remedies available.

4.3 Workers Organization

- MLHCP, FAO, Consultants as well as Sub Project Contractors and their Sub Contractors must not attempt to influence the right of workers to organize or associate with any Trade Union;
- The union workers must be allowed to have access to company/employer premises to carry out their responsibilities therein, as long as they exercise their duties in a reasonable and non-disruptive manner;
- MLHCP, FAO, Consultants as well as Sub Project Contractors and their Sub Contractors shall not intimidate or harass union workers due to their active participation in collective bargaining or strikes aimed at improving working conditions; and
- MLHCP, FAO, Consultants as well as Sub Project Contractors and their Sub Contractors must not refuse to recognize the elected representatives of the union members. Thus, the elected representatives of the unionized workers must be recognized and engaged during collective bargaining and other deliberations that border on employee and staff welfare.

4.4 Age of Employment

According to international law, children are entitled to the basic right to education and must not be hired to work (especially hazardous work such as civil works). Therefore,

- The minimum age for project workers under the SLLAP and SPF Project will be 18 years
- No child under the age of 18 years shall be employed either directly or indirectly to work during the construction or rehabilitation phase of SLLAP.
- The FAO⁴ and MLHCP through the PCU and Project Supervising Consultants must institute a verification system where every worker must have their age verified by a recognized community/opinion leader in addition to presenting a national identity card as a precondition for employment or birth certificate where available prior to employment.
- The Social Safeguards Specialist at the PCU shall routinely undertake spot checks for issues of child labor.
- Where there is any reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or chiefdom tax receipt).
- Person under 18 years found on site or working within project will be summarily removed out of the site
- Work on a site involving minors (less than 18 year) will be suspended and Sub Project Contractor will be reported to the Sierra Leonean police for investigations and necessary action
- MLHCP and Sub Project Contractors, including CSOs in the case of the SPF Project, shall be required to undertake a child labor risk assessment for each sub project and activity following the under listed steps:
 - Identify communities and persons vulnerable to child labor risks as well as hazardous activities to children/minors through consultation with relevant Ministries, Non-Governmental Organizations and Community Based Organizations in the Sub Project catchment, review national legislations and ESS2 requirement on child and forced labor.
 - Evaluate and prioritize risks.
 - Decide on action to prevent or control the identified risks.
 - Put in place the preventive and control measures through a prioritization plan.
 - Monitoring, reviewing and updating the established preventive and control measures daily

⁴ As referenced above, FAO would only recruit consultants and CSOs as well as have their own staff

- MLHCP Sub Project Contractors and their Sub Contractors shall create and keep separate record of all project workers.

4.5 Occupational Health and Safety

- Sub-project contractors must provide safe and healthy working facilities and take appropriate precautionary measures to protect workers from anticipated dangers in the workplace. Contractors will prepare OHS plans, which will be reviewed by PCU of FAO, and subsequently implement them.
- Sub-project contractors must also have a pre-established action plan designed to respond effectively to workplace accidents and health hazards in the event that all precautions fail.
- The contractor must consult employees and their representatives on health and safety matters in the workplace. Employees must be given adequate information regarding health and safety matters and asked to contribute their input on such issues as the alteration of workplace processes, occupational safety, and the organization of work.
- No employee must be punished for removing him/herself from a working environment that he or she reasonably perceives to be dangerous or harmful.
- Employees of FAO, MLHCP, Sub Project Contractors and Sub-Contractors as well as Project Consultants shall be trained or given orientation on GBV/SEA/SH and health and safety. OHS training/orientation will be provided prior to beginning a new assignment. All workers will be required to avail themselves for OHS training and subsequent toolbox meetings.
- Sub-project contractor/employers/ MLHCP/FAO must also ensure that workers are fully updated and capable of carrying out their work tasks safely.
- Workers must be provided with the appropriate Personal Protective Equipment (PPEs) which must be always worn on site as well as during the performance of any task.
- MLHCP/FAO, sub-project contractors and Suppliers shall ensure that regulations on the use of PPEs are enforced on site and within the working premises.
- Workers must be provided facilities such as canteens, toilets, first aid kits, potable water, hygiene and, WASH facilities including washing points (clean running water, soap and tissue paper) on site and within the work environment.
- Work plans and schedules should avoid crowding on site and within the premises while enforcing COVID-19 protocols e.g., social distancing at work and the use of face masks to protect workers against COVID-19. Workers must be encouraged to get vaccinated.
- Sub-Project Contractors and Sub-Contractors will be required to maintain proper housekeeping on site.
- Facility Managers, Sub-Project Contractors and Sub-Contractors shall be required to designate qualified management personnel to handle environmental, social, labor, occupational health and safety issues including grievance redress and enforce the provisions of this LMP in line with Sierra Leonean laws on as well as requirements of ESS2 and ESS4, site specific ESMPs, and other sub project safeguards instruments on site.

4.6 Contractor Management

Sub project Contractors will be managed based on contracts they signed with MLHCP of FAO. These contracts will

include relevant clauses on environmental and social safeguards that prohibit any form of discrimination, child and forced labor, guarantees freedom of association, access to grievance redress mechanisms, safe working environment and rights of workers under the Sierra Leonean laws in line with the World Bank ESS2. The contract documents for works contractors, primary suppliers as well as for monitoring consultants shall have a requirement mandating their employees to sign explicit Codes of Conduct. There will be periodic mandatory training of all workers on GBV/SEA/SH issues and Code of Conduct.

Accidents/incident reporting is established in Sierra Leone under the Factories Act of 1974. The number and type of all accidents and incidents including near misses and spills occurring during the construction phase shall be recorded in the Accident Record Book to be kept by each Sub Project Contractor, Sub Contractor or Third-Party Suppliers. The information to be captured will include but not limited to the time and type of incident/accident, persons involved, type of injuries/fatality, location of accident and incident. After investigations, the following will be presented as part of Sub Project Contractors' Monthly Progress Report in addition to the information specified above:

- cause(s) of the accident/incident;
- remedial/corrective measures; (including sanctions, if necessary); and
- compensatory measures, if necessary

Sub Project Contractors shall notify their Supervising Consultant, the Inspector Factories at the District, and the MLHCP/PCU, or FAO in the case of the SPF Project, within twelve (12) hours after the occurrence of any accident results in significant damage or loss of property, disability or loss of human life, or which has, or which could reasonably be foreseen to have a material impact on the environment. They will submit to same no later than twenty-eight (28) days after the occurrence of such an event, a summary report thereof.

4.7 Primary Supply Workers

MLHCP shall ensure that any contractors or suppliers engaged under SLLAP have sound environmental standards and management practices in place. FAO shall do the same with regard to the SPF Project. Therefore, all suppliers to the projects must be assessed to ensure compliance to the required environmental and social management standards. The assessment should be embedded in in the tendering, hiring and contracting processes, and any due diligence measures required in the sourcing of supplies for the project.

The contract documents for primary suppliers will include explicit clauses on child and forced labor, GBV/SEA/SH as well as response extraction of natural resource, e.g., wood products, gravel and quarry products.

4.8 Community Workers

The SLLAP project is expected to use community resource persons to assist with the participatory land mapping and registration process as well adjudication of disputes that may arise. The SPF Project may use community workers to assist with research, awareness-raising and training. The following safety measures will be put in place to prevent or minimize exposure to job hazards about their work as well as protecting them against COVID-19:

- i. Institute transparent system for the hiring of community workers
- ii. Ensure OHS plans cover issues affecting community workers
- iii. Train community workers on the requirements of the labor and working conditions as set out in the LMP
- iv. Provide community workers with the personal protective equipment (PPE) including nose masks and hand sanitizers for COVID-19.
- v. Encourage community workers to get vaccinated for COVID-19;
- vi. Provide information on the GRM to be used in case of a community complaints
- vii. Establish a monitoring system on the performance of the Community workers.

4.9 Worker Grievance Redress Mechanism

SLLAP

Workers must have the right to submit grievances regarding workplace concerns without the threat of adverse employment action or prejudice. Complaints may range from dissatisfaction with work hours and rest periods to claims of coercion, intimidation or abuse including GBV/SEA/SH. In order to facilitate the expression of these complaints:

- MLHCP and Sub Project Contractors must work with the workers or their representatives to establish and maintain an effective grievance mechanism through which workers can lodge complaints.
- Workers grievance and complaints boxes must be placed at vantage places where workers can log their complaints.
- MLHCP and Sub Project Contractors shall inform all workers about the grievance mechanisms put in place during orientation sessions, toolbox meetings and using notice boards on site.
- The grievance mechanism should serve three key functions. First, it should serve as a focal point of communication across the organization where workers can report and receive advice on their concerns and grievances and from which concerns and grievances are channeled to management. Second, the mechanism should be mandated to identify remedies to be implemented through internal procedures in the form of corrective action, mediation, settlement or dispute resolution. Third, the mechanism should have the capacity to direct complainants or hand over cases to appropriate external mechanisms, including non-state and state-based mechanisms, such as courts, GBV Service Providers and the Family Support Unit of the Sierra Leone Police Force in the case of GBV/SEA/SH complains.
- The internal grievance redress mechanism should not in any way prejudice the complainant's ability to seek recourse through external mechanisms.
- MLHCP and Sub Project Contractors must examine all grievances pursuant to its pre-established grievance procedure.
- Any worker filing a grievance must receive notice of the contractor/employer's findings regarding his or her particular complaint and whether corrective action will be taken.

The proposed structure for Grievance Redress Mechanisms under SLLAP are discussed as follows:

Grievance Redress Mechanisms for Workers on Site

The proposal is to provide phone line that aggrieved workers can call to register their grievances directly to a management level personnel of the Construction Firms that will be implementing the works. This contact number must be advertised so that workers are aware of it and encourage to use it without being intimidated or targeted for negative feedback.

Workers may also lodge their grievance in writing or verbally through their supervisors. If supervisors fail to resolve the issues or he/she is the subject of the grievance, workers can escalate the issue(s) to their union executives, in situations where the workers/workers belong to a trade/workers' union. The union leaders will escalate the matter to management and meet with management to resolve the grievance. Where unions do not exist, as in the case of informal sector workers, the matter will be escalated to contractor management if it is beyond the Supervisor. If management is unable to resolve the matter, the aggrieved worker/workers will proceed to petition the MLHCP/PCU and Honorable Minister of Labour and Social Welfare. If the aggrieved worker/workers is/are not satisfied with the outcome of the process, he/she/they can opt to go to court. Similar processes and timelines for resolving community grievances are proposed for the workers' grievance system. Employees of the Sub Project

Contractors and Sub-Contractors are also free to use the Anti-Corruption Commission (ACC) platform (toll free hotline and ACC Community Monitors) to register their grievances and seek feedback.

Workers will be informed of the grievance procedures as proposed and the provisions of country's laws through orientations, toolbox meetings and their supervisors as well as through the Code of Conduct.

Grievance for Gender-Based Violence (GBV) Issues

There will be specific procedures for addressing GBV/SEA/SH including confidential reporting with safe and ethical documentation of GBV cases guided by the SL GBV Referral Protocol. Multiple channels will be put in place for lodging a complaint in connection to GBV /SEA/SH. Specific GRM considerations for addressing GBV/SEA/SH are:

- The project will make use of existing GBV GRM system(s) to address GBV/SEA/SH;
- The Project will establish multiple complaint channels, and these must be trusted by those who need to use them.
- No identifiable information on the survivor should be stored in the GRM logbook or GRM database.
- The GRM should not ask for, or record, information on more than three aspects related to the GBV/SEA/SH incident:
 - The nature of the complaint (what the complainant says in her/his own words without direct questioning);
 - The complainant's knowledge about whether the perpetrator was associated with the project; and,
 - If possible, the age and sex of the survivor.

The GRM should assist survivors by referring them to GBV Services Provider(s) or the nearest one stop GBV center for support immediately after receiving a complaint directly from a survivor. This will be possible because there are already existing GBV service providers a list of service providers and GBV centers will be made available before project work commences as part of the mapping exercise.

The information in the GRM must be confidential-especially when related to the identity of the complainant. For GBV, the GRM should primarily serve to: (i) refer complainants to the GBV Services Provider; and (ii) record resolution of the complaint.

Data Sharing: GBV Service Providers will have their own case management process which will be used to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GRM operator. The GBV Services Provider should enter into an information sharing protocol with the GRM Operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and that the case is closed. Service providers are under no obligation to provide case data to anyone without the survivor's consent. If the survivor consents to case data being shared the Service Provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or Service Provider at risk for experiencing more violence or abuse. For more information on GBV data sharing see: <http://www.gbvims.com/gbvims-tools/isp/>. The GRM will have in place processes to immediately notify both the ministry and the World Bank of any GBV complaints with the consent of the survivor.

SPF

The GRM associated with the implementation of the SPF will be specified in detail in the Standard Project Agreement signed between FAO and MLHCP, including purpose of GRM and guiding principles, as well as resolution mechanisms and contacts. FAO will be responsible for documenting and reporting as part of the ESF performance monitoring on any grievances received and how they were addressed.

World Bank Grievance Redress System (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank’s GRS. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the World Bank’s Independent Inspection Panel which determines whether harm occurred, or could occur, as a result of World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond.

4.10 Responsible Staff

The MLHCP through the PCU shall have oversight responsibility for the management of all labor issues associated with both projects during the construction and operational phases of the projects. Sub Project Contractors will play leading roles in direct supervision and enforcement of all the labor management procedures outlined in the LMP. Table 2 presents summary of the key roles and responsibilities associated with the LMP.

Table 2: Key Roles and Responsibilities associated with the LMP

Responsible Parties	Designation of Responsible Officer	Roles and Responsibilities
Ministry of Lands, Housing, and Country Planning (MLHCP)/ Project Coordination Unit (PCU)	Environment Specialist; and Social & Gender Specialist	<ul style="list-style-type: none"> ○ Development and oversight over implementation of procedures and protocols relating to labor and working conditions including grievance redress ○ Ensuring that Environmental and Social Clauses are inserted in contracts documents to protect workers’ rights, and non-discrimination and formation of workers associations/unions at work, and prohibition of child and forced labor and ensure terms and conditions of work are in line with Sierra Leonean laws ○ Monitoring and reporting on labor related issues to the satisfaction of the World Bank and other relevant stakeholders ○ Ensuring that work-based grievance redress mechanisms are established and maintained through the Project lifespan ○ Ensure the requirements of the World Bank ESS2 are complied with during project implementation ○ Organize orientation sessions on OHS, GBV/SEA/SH for Project Workers ○ Accident and incident reporting to the Bank and other stakeholders ○ Ensure the Project GRM is established, and its use is widely publicized ○ Ensure ESMP: forms part of and explicitly referred to in bidding document, relevant mitigation measures are reflected and budgeted in contract, make clear the responsibility of the contractor prepare and adhere to a CESMP based on the ESMF/ESMP ○ Contract to specify the penalty the contractor will face if provisions of the ESMF/ESMP and CESMP are not adhered to
Sub Project Contractors and Suppliers	Designated Environmental, Social and Health Officer with the Contractors	<ul style="list-style-type: none"> ○ Responsible for updating the LMP into a plan and comply with all the provisions in the plan for the management of the workforce and their health and safety based on this LMP, ESMF and Sub project ESMP. ○ Comply with E&S clauses that relate to labor issues ○ Train site workers and those of Sub Contractors on OHS issues and work-based grievance redress and good community relations ○ Set up participatory, accessible and time bound systems to receive, investigate, resolve and provide feedback on workers grievance

Responsible Parties	Designation of Responsible Officer	Roles and Responsibilities
		<ul style="list-style-type: none"> ○ Ensure that their workers participate in OHS, GBV/SEA/SH and other orientation sessions
Project Workers	Designated Environmental, Social and Health Officer	<ul style="list-style-type: none"> ○ Comply with various policies and procedures developed for the management of the workforce and their health and safety based on this LMP, ESMF and sub project ESMPs ○ Avail themselves for OHS, GBV/SEA/SH and other orientation sessions
GBV Service Providers	Rainbo Initiative	<ul style="list-style-type: none"> ○ Provide case management services for GBV/SEA/SH survivors including counselling, medical care ○ Awareness creation on GBV/SEA/SH
Local Community	Paramount and Local Chiefs	<ul style="list-style-type: none"> ○ Enforce various policies and procedures developed for the management of the workforce and their health and safety.

5.0 MONITORING AND REPORTING ON LMP

5.1 Labor Management Procedure Monitoring

A list of monitoring indicators, frequency of monitoring and responsible party/parties for monitoring are presented in Table 3 to guide the monitoring of the LMP. The indicators are not exhaustive and can be updated during the preparation of sub project safeguards instruments and during project implementation.

Table 3: Monitoring Indicators for the LMP

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
Occupational Health and Safety Issues	<ul style="list-style-type: none"> • Number, type, place and time of accidents/incidents and/or near misses • Number of OHS and hygiene training programs provided for sub project contractors' and sub-contractors employees. • Number and type of PPEs distributed by Sub Project Contractors and Sub-Contractors • Number of workers on site wearing the appropriate PPEs • Presence of Health and Safety Officer on Site • Site workers level of compliance with OHS standards, e.g., wearing of PPEs • Presence of First Aid Kits on site • Presence of Fire Extinguishers on Site • Hoarding material • Presence of handwashing facilities and hand sanitizers on site or otherwise • Suspected and confirmed COVID-19 cases on site • Percentage of workers vaccinated for COVID-19 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Site Visits • Sub Project Contractors Accident Records books • Accident/ Incident Reports 	<ul style="list-style-type: none"> • MLHCP/ PCU • FAO for SPF (jointly with MLHCP/ PCU) 	<ul style="list-style-type: none"> • Sub Project Consultant • District Factory Inspectors • Supervising Consultant
Labor Related Issues	<ul style="list-style-type: none"> • Number of Sub Project Contractor and Sub-Contractor employees with formal Contracts • Number of child labor cases recorded • Number and type of employees recruited from the community by gender • Average monthly income of project workers and informal workers by gender • Working days and hours • Contractor and Sub-Contractor employees who have signed and comply with the Code of Conduct 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Site Visits • Inspection of Employees Contracts • Random interview of project workers 	<ul style="list-style-type: none"> • MLHCP/ PCU • FAO for SPF (jointly with MLHCP/ PCU) 	<ul style="list-style-type: none"> • Sub Project Consultant • District Factory Inspectors • Supervising Consultant

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
Gender Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment	<ul style="list-style-type: none"> • Uptake points of complaints • Number of SEA/SH/GBV cases reported by type • Number of SEA/SH/GBV cases under investigation by type • Number of cases under prosecution by type • Number of cases resolved/discharged by outcome • Sex and age of perpetrators and survivors • Duration between case reportage, feedback and case completion 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Grievance Redress Mechanism Platform • On Site Grievance Redress Register 	<ul style="list-style-type: none"> • MLHCP/PCU • FAO for SPF (jointly with MLHCP/PCU) 	<ul style="list-style-type: none"> • Sub Project Consultant • GBV Service Providers • ACC Community Monitors • Sierra Leone - FSU

5.2 Reporting on the Labor Management Procedures

SLLAP

Sub Project Contractors and Consultants will submit Monthly Progress Reports on Environment and Social (E&S) Safeguards to the PCU with a section dedicated to progress on the implementation of measures outlined in this Labor Management Procedures and plan prepared based on this procedure. The section will report on non-compliance issues and timelines for compliance, incidence/accident reports, status of grievances received among others. The report will also discuss mitigation measures of identified emerging labor impacts/risks.

The PCU Safeguard team will compile a summary of the E&S issues on the Project in a quarter and submit to the Bank in the Quarterly Report including highlights on issues relating to ESS2 and progress and performance of implementing this LMP.

Annual third-party monitoring reports and a project completion report capturing implementation of the LMP will also be prepared by third party specialists.

SPF

FAO will require CSOs, as part of their reporting process to report quarterly on any labor related issues to FAO. The information collected will be included in the quarterly environmental and social monitoring report that will be submitted to the PCU.