

THE GOVERNMENT OF SOMALILAND



Ministry of Education and Science (MoES)

**Somaliland Empowering Women Through
Education and Skills Project
‘Raja Kaaba’**

Labour Management Procedures (LMP)

February 2025

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LIST OF ABBREVIATIONS AND ACRONYMS

CBO	Community-based organization
CoC	Code of Conduct
CSI	Civil Service Institute
CSSP	Civil Service Support Project
EOC	Emergency Operations Coordinator
ERP	Emergency Response Plan
ESF	Environment and Social Framework
ESS	Environment and Social Standards
EMIS	Education Management Information System
ESSP	Education Sector Strategic Plan
FCV	Fragility, Conflict & Violence
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-based Violence
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRS	Grievance Redress System
HR	Human Resource
HRMIS	Human Resource Management Information System
ICCPR	International Covenant on Civil and Political Rights

ICT	Information, Communication Technology
IDPs	Internally Displaced Persons
ILO	International Labour Organization
IPC	Infection Prevention and Control
LESCO	Labour, Economic and Social Council
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MoHD	Ministry of Health Development
MOLSA	Ministry of Labour and Social Affairs
MOECHE	Ministry of Education Culture and Higher Education
MoES	Ministry of Education & Science
MoF	Ministry of Finance
MTR	Mid-Term Review
NGO	Non-governmental Organization
NFE	Non-Formal Education
OHS	Occupation health and safety
PBC	Performance Based Conditions
PCU	Project Management Unit
PDO	Project Development Objective
PIP	Project Implementation Partner
PMIS	Pension Management Information System
PPE	Personal Protective Equipment
PWDs	Persons with disabilities
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Social Management Plan
TA	Technical Assistance
TMP	Talent Management Program
ToR	Terms of Reference
TVET	Technical and Vocational Education Training
WBG	World Bank Group
WDCs	Women's Development Centres

EXECUTIVE SUMMARY

1. Somalia, including Somaliland is confronted with substantial challenges resulting from years of instability and underinvestment in human capital, including widespread poverty, low economic growth, low fiscal capacity, and fragility. It is one of only four countries on the World Bank's list of fragile and conflict-affected situations (FCS), rated as a "high intensity" conflict and one of the poorest countries in the world with a per capita gross domestic product (GDP) of US\$327. An estimated 69 percent of the population live in poverty (below US\$1.90 per day according to the most recent 2018 estimate), with the poverty rate likely to increase, as the population growth rate (2.83 per annum in 2015-2020) outpaces the annual economic growth rate (2.8 percent average in 2016-2020). Fiscal capacity continues to be low, with a government expenditure-to-GDP ratio of 12.4 percent (2020) and a tax-to-GDP ratio of 2.5 percent (2020). These factors all constrain the Government of Somaliland's ability to deliver services. The Government of Somaliland's capacity to respond to these challenges has been constrained by ongoing political uncertainty. Within this evolving context, there is also a concern that militia-based opposition, known as Al-Shabaab, may capitalize on the situation.

2. The Somali civil war and the associated violence and collapse of state institutions has resulted in two generations of Somali children largely missing school. In general, according to the World Bank, just 55 percent of Somalis can read and write, while only 16 percent of Somalis have completed primary school (compared to 34 percent in low-income Sub-Saharan African countries). Only 7 percent have finished secondary school (compared to 19 percent in Somalia's regional peers).

3. The Government of Somaliland ("Recipient"), through its Ministry of Education and Science is implementing the Somaliland Empowering Women through Education and Skills – "Raja Kaaba" Project (P176898) (hereinafter known as "the Project"), in close coordination with the Ministry of Education and Science (MoES) where the parent project is being managed and implemented, and in full liaison with other participating Ministries of Education at the Federal Member State level. The International Development Association (IDA, hereinafter "the Association") is financing the Project. The Raja Kaaba project is in line with the Somali National Development Plan, 2020-2024 that promotes a "just, stable and prosperous Somalia." Implementing the project will help Somalia make significant steps towards the achievement of multiple Sustainable Development Goals (SDGs) related to education (SDG 4), gender (SDG 5), equity (SDG 10), and peace and security (SDG 16). The project's interventions are in sync with the priorities of the Somalia Education Sector Strategic Plan (ESSP, 2022-2026).

4. The overall objective of the Project is to improve literacy and numeracy skills of women in selected areas and to prepare women for leadership roles. In addition to the parent Project in Somalia, the project component in Somaliland will support the Government of Somaliland's efforts to educate and empower girls and women with skills to promote their economic empowerment and capacity to lead. Boosting women's economic empowerment is essential to achieving economic growth, shared prosperity, and social stability in Somaliland and to meet current Government objectives set out in the Somaliland National Development Plan III (NDP 2023-2027).

5. The Project design recognizes the self-reinforcing dynamics of women's success across various levels of education. Female leadership at the top of society requires a pipeline of girls and women progressing through primary to secondary education and beyond. Acquisition of numeracy and literacy skills enhance women's basic ability to engage in the world and facilitate access to skilled occupations and entrepreneurship. The Project's comprehensive approach, focused on basic literacy and numeracy, skills training, and higher education, recognizes the potential for a virtuous cycle of women's success up and down the educational system. The project has three components as presented in Table 1 below.

Table 1: Project Components

No.	Component	Description
1	Component 1: Skills for Life and Labour	Focuses on enhancing basic literacy and numeracy skills, skills for income generation, and cross-cutting life skills for adolescent girls and women. The

No.	Component	Description
	Market Success	primary beneficiaries will be girls and women, but up to 10 percent of beneficiaries in each target district may be disadvantaged boys and men (e.g., members of marginalized groups such as Internally Displaced Persons (IDPs) or men with disabilities). The project will establish a Skills Development Fund (SDF) to finance service providers and delivery methods as appropriate to the diverse regions of the country.
2	Component 2: Higher Education for Women's Leadership	The component will support the utilization of existing facilities and academic programs at selected institution(s) of higher learning. The component will finance the renovation of existing university campuses to serve as the Somali Women's University (SWU) in Hargeisa and other regions, to be identified. The autonomous (or semi-autonomous) SWU will serve as the institutional hub for a system-wide expansion of women's leadership development through enhanced women's participation in higher education. The university will offer courses designed to enhance women's skills and competencies to serve effectively in high-skilled employment and in leadership roles in politics, government, and the world of business.
3	Component 3: Systems Strengthening, Technical Assistance and Project Management	The project will finance the development of a robust system for collection and utilization of data on non-formal education (NFE), technical and vocational education training (TVET), higher education and tracking gender gaps. Focus will be the development of modules for NFE, TVET, and higher education in Somalia's education management and information system (EMIS).

Project Beneficiaries

6. During the implementation period, under Component 1, the project is expected to benefit less than 50,000 young women aged 15-35 from primarily marginalized and vulnerable populations, including from IDP communities, in the targeted districts in Somaliland, specifically covering Maroodi Jeex, Togdheer and /or Sanaag regions. While the primary beneficiaries will be girls and women, substantially less than 10 percent of beneficiaries in each target district may be disadvantaged boys and men (e.g., members of marginalized groups such as IDPs or men with disabilities¹). Component 1 will directly benefit these beneficiaries through non-formal second-chance programs focused on functional literacy and numeracy, livelihoods, and sector-specific skills and labour market qualifications. Under Component 2, nearly 300 - 400 women (TBD) will directly benefit from Women's Development Centres (WDCs) with short-courses, mentorship and leadership development opportunities and the consortium of women's colleges will be established to offer certificate and degree programs. Across components, it is expected that at least 10 percent of beneficiaries will be persons with disabilities.

Labour Management Procedures (LMP)

7. This LMP lays out the project's approach to meeting national requirements, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), specifically "Environmental and Social Standard 2 (ESS2): "Labour and Working Conditions". The LMP is aimed at promoting the implementation of a systematic approach to improving the management of risks and impacts related to labour and working conditions in the proposed project. The procedures identify the ways in which national law and the requirements of ESS2 are applied to the project.

8. ESS2 recognizes the centrality of fairness, non-discrimination and equal opportunity among workers. Also, protection of workers since worksites may attract child and forced labour. ESS2 requires the Borrower to develop an LMP which sets out how project workers will be managed, in accordance with the requirements of national law and ESS2. The procedures outline how the LMP will apply to different categories of project workers including direct workers, and the way in which

¹ To be confirmed based on available budget

the Borrower will require contractors to manage their workers.

9. Before the implementation of activities on the ground, the government of Somaliland will oversee the development of two Environmental and Social Management Standards per site. An ESMP will be developed with environmental and social mitigation activities for university campus renovation, while a different operation ESMP will be developed to address possible environmental and social risks occurring during university campus operation activities. Both ESMPs should be developed at different stages of the project and shall include necessary context-relevant mitigation measures for identified occupational health and safety risks.

10. The standard ESMP will then be modified/enhanced based upon the subproject screening (and any other additional activity) and be used as a requirement for contractors (including a base for their C-ESMP). Similarly, the standard operation phase ESMP will also be modified/enhanced based upon the actual conditions (design, location, services, etc.) of an individual university prior to the end of works. These standard ESMPs will be presented to the World Bank for review and clearance and will help ensure consistency and adequacy (completeness, details) among individual schools/subprojects”

Legal and Policy Framework

11. The Somaliland Constitution makes the following provisions on Labour in Article 20: The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law. All employees have a right to payment appropriate to the work they undertake and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited. The State shall endeavor to create understanding and clear rights between employees and employers and shall accordingly introduce a law in this respect. The State shall promote the support systems, insurance and safety of employees and shall strengthen the relevant responsible bodies. Further, the right to form trade unions is part of the right to freedom of association but is specifically mentioned in Article 22(1) of the International Covenant on Civil and Political Rights (ICCPR). This right is also covered by ILO Conventions, such as the freedom of association and Protection of the Right to Organise Convention 1948 and the Right to Organise and Collective Bargaining Convention 1949. Social security, pension and special allowances: (i) social security, compensation for service- incurred death, illness or injury, pensions and other related benefits, subsistence allowance for special services shall be established by separate laws; (ii) until otherwise provided by law, the benefits referred to the preceding paragraph, shall continue to be governed by the existing laws and the time of entry into force of this law.

12. The Somaliland Labour (Amendments & Additions) Law, No. 31/2020 which was gazette in 2021 is the law governing all aspects of labour and working conditions for all private entities in the country. The law covers the contract of employment, terms and conditions, remuneration, and OHS, trade unions and labour authorities. This Law applies to all project workers. The law is broadly consistent with the ESS2, although there is a significant gap in the enforcement aspects of the legislation.

13. OHS concerns have been identified as a potential risk associated with the Project activities during both implementation and operation phases. Therefore, in accordance with the requirements of ESS2, this LMP includes measures to address OHS risks. The purpose of the LMP in relation to ESS2 is to describe how the Project Management Unit (PIU) at the Somaliland level, together with the PMU at the federal level, will manage all project workers in relation to the associated risks and impacts.

14. Somaliland, like all countries, continues to fight the COVID-19 pandemic. Given that COVID-19 is likely to be a challenge for a long time, it is critical that all project teams continue to take precautions against the pandemic. Protection against possible COVID-19 risks will be managed through several measures including ensuring safety at work, social distancing, handwashing and prompt medical attention to any worker displaying COVID-19 symptoms. The management of COVID-19 will be guided by the MoH and WHO guidelines.

Application of the LMP

15. The LMP will be administered to the different categories of project workers as summarized in Table 2. It is notable that the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) will be determined during the implementation of each subproject.

Table 2: Description of project workers

Category	Description
Direct workers	Include MoES staff at the State level, consultants hired in the PIU, and supervision consultants for the various works including Information Communication and Technology (ICT) for online learning.
Contracted workers	Skilled staff of the primary contractors (contractors hired to deliver on the project), skilled workers engaged by sub-contractors (e.g., heavy machine operators), and unskilled community members engaged by the contractors (e.g., host community members and IDPs, immigrant workers, including female workers)
Primary supply workers	Workers hired to supply essential school renovation materials such as aggregates and building blocks on an ongoing basis for the project or the equipment needed for ICT
Community workers	Members of the community who will provide leadership and oversight during the renovation of the university campus, recruitment of female teachers/ instructors, oversight on learning activities, and follow-up on learners.
Civil servants	Government civil servants (including district education officers in the ministries and departments, teachers and university administrator and workers) will remain subject to the terms and conditions of their existing public sector employment, although OHS including security and GBV/SEA measures will apply.

Anticipated labour and OHS risks

16. There are **substantial to moderate** environmental risks associated with the project. Most of the risks are related to the expected limited renovation activities under Component II in the project. Renovation works is likely to result in the occurrence of environmental impacts, including noise pollution, soil erosion, waste and wastewater management, loss of vegetation, e-waste, as well as possible occupational health and fire safety risks. Congregating large numbers of persons during the COVID-19 pandemic is likely to result in exposure to the virus. In addition, there are potential OHS risks related to the renovation of the university campuses and ICT installation, as well as in operation and maintenance of the facilities. To manage these risks, detailed OHS requirements have been included in the ESMF and shall be included in the two-phase ESMPs that shall be prepared, including the separate contractor C-ESMP and operational ESMP, based on the standard ESMP, to ensure protection of all workers. The table 3 below presents an analysis of the labour and OHS risks.

Table 3: Project Labour OHS² and CHS³ Risk Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)
Labour and Working Conditions – ESS2	
Terms and conditions of employment	The Labour Code (Law No. 31/2020 and its Amendments & Additions) stipulates that remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory regarding age, gender and other aspects. The ESS2 provides for the promotion of fair treatment, non-discrimination and equal opportunity of project workers, either negotiated or of already agreed terms. Labour disputes may also arise due to disagreements amongst the workers, and between workers and the contractors, primary suppliers and community workers.

² Occupational Health and Safety (OHS)

³ Community Health and Safety (CHS)

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)
Labour and Working Conditions – ESS2	
Labour disputes	The contractor and primary suppliers will have workers who will be involved in the renovation of the university campus and installation of ICT equipment. Potential labour disputes may arise due to interpretation, application and/or breach of collective bargaining agreement (CBA), individual contract regarding conditions of employment, variation or change of job descriptions (JD), fringe benefits, hours of work, and wages, either negotiated or of already agreed terms. Labour disputes may also arise due to such disagreements amongst the workers on one hand, and between workers and the contractors, primary suppliers, and community workers, on another hand.
Occupational health and safety	The project activities during both implementation and operational phases of facilities developed under the project. During the renovation of the university campus, and installation of ICT equipment, there may be associated OHS risks including physical hazards, such as slips, trips and falls from heights associated with working on ladders, elevated noise, electrocution of the workers/staff, and exposure to air pollution hazards, including elevated dust levels and potential exposure to building hazards such as asbestos containing materials (if there are any existing structures to be removed), lead based paint, working in high temperatures environment, potential safety and health risks due to manmade fires or natural disasters. These shall be managed with reference to the World Bank's EHS General Guideline. In the operation phase of the facilities, the workers may potentially be exposed to workplaces hazards, including, but not limited to, to COVID-19 and other contagious diseases. The project team shall make reference to Good International Industry Practice (GIIP) for guidance. An example of such industry practice is available at the resource identified in the footnote below. ⁴
Discrimination of employment based on gender, disability or ethnicity	Discrimination based on gender, disability and clannism in recruitment exists especially at the local level during the renovation of the university campus. There is also a risk of bias in the recruitment of project staff and workers.
Use of child labour	The Labour Code forbids work for children below the age of 15, but allows employment of children between the age of 15-18, however, employment has to be compatible with proper protection, health and the moral of children. Nevertheless, risk of child labour is still expected during implementation phase.
Use of forced labour	There is a risk of forced labour being used during the recruitment and in the implementation. In addition, community level labour may be provided through force by parents/guardians and/or community leadership. However, risk is foreseen as minor.
Infrastructure and Equipment Design and Safety	Project workers may be affected by operational accidents or natural hazards, including extreme weather events, during the implementation and operation of project-funded facilities. The project will ensure that the design, implementation, operation, and decommissioning of infrastructure components shall be in accordance with the WBG's EHSGs and other GIIP, taking into consideration safety risks to project workers (in addition to third parties and affected communities). The structural elements of the project shall be designed and constructed by competent professionals and certified or approved by competent authorities or professionals. Structural design will take into account climate change considerations, as appropriate.
Safety of Services	Project workers may be exposed to risks at quarries or excavation works, such as rock falls or hazardous equipment. The workers also stand at risk of using contaminated water and the attendant spread of diseases. The project will need to ensure the use of competent contractors who can mitigate other risks, including electric shocks from electrical cabinets or cables or poor waste disposal. The ministry shall also apply the concept of universal access for both project workers and project beneficiaries.

⁴ Please see [OHS Classifications - Occupational Health & Safety \(monash.edu\)](#) [Health and safety management system Framework / Health, Safety and Wellbeing / Working here / Current staff / The University of Newcastle, Australia](#)

LMP - Empowering Women Through Education and Skills Project in Somaliland (P176898)

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)
Labour and Working Conditions – ESS2	
Emergency Preparedness and Response (EPR)	Project workers may be exposed to risks arising from emergencies occurring during the life of the project. The emergencies may occur as a result of both natural and man-made hazards, and may be in the form of fires, explosions, leaks, or spills, which may occur for a variety of reasons, including: failure to implement operating procedures that are designed to prevent their occurrence, extreme weather, or lack of early warning. To mitigate this, the project shall, through the Emergency Response Plan, identify and implement measures to address emergency events. The project's Environmental Specialist will be appointed as the coordinator for the ERP and given the necessary training as required.
Insecurity	The main security threats associated with the project include attacks on workers (direct, contractor, community, and suppliers) and WDC supporting project as well as possible theft of project materials and equipment. Some target districts suffer periodic community conflict which may be exacerbated through siting of schools or use of outside contractors etc. Insecurity may limit access for implementation and monitoring of the project.
Fire risk	Without provisions for fire safety, there is a risk of fire outbreaks at worksite during works especially in the use of electric hand drills. Fires can start from ignitable materials, like paints, adhesives or poor storage of flammable materials, high temperatures, cigarette smoking in non-designated places or malfunctioning electrical connections.
GBV/SEAH	Labour influx and the movement of the project staff (contractors, suppliers, and PIM team) from one location to another especially during monitoring and the delivery of equipment and materials to schools may result in Gender Based Violence (GBV) and Sexual Exploitation and Abuse, Sexual Harassment (SEAH) such as unwelcomed sexual advances, abuse between project workers, learners, and workers in schools. There is also a risk of SH among the workers, trainers, teachers and among the young adults.
Community Health and Safety – ESS4	
Labour influx	There is likely to be internal movement of people from areas outside the project area to provide labour, deliver goods and provide services (such as renovation, installation of equipment and training). Such movements may result in increased demand and competition for local social and health services, as well as for goods and services, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, social conflicts within and between communities, increased risk of spread of communicable diseases, and increased rates of illicit behaviour and crime, including GBV cases.
Hiring of security personnel	Given that the project is implemented within an FCV context, and the project geographical reach stretches across different districts, the project may use security personnel who are normally an easy target from the insurgents and expose project sites to security risk and possibility of attacks as a result of such association.
Spread of diseases in communities, including HIV/AIDS and COVID-19 through project activities	The implementation of the project may lead to increased risk of COVID-19 infections. In addition, there is a risk of HIV infections through interactions between and among workers and learners in the supported schools and universities.
Management of e-waste from the equipment and PPE during renovation	All workers will be required to use PPE as and when required by the MoH (including masks) which will need to be disposed in line with the provisions of MoH and WHO. There will also likely be e-waste from materials used by the project that would require appropriate disposal – including wastes from computers.
Traffic related hazards	There are risks associated with traffic and road safety hazards during the implementation and operation phase in relation to the collection, supply and delivery of materials and equipment for the project.

17. The risk of GBV, SEA and sexual harassment, is currently assessed as **High**, based on the existing high rates of GBV in the country, extending from conflict and shocks such as droughts,

floods and other climate-related challenges, and social norms that entrench gender inequalities in Somalia. The risk categorization is influenced further by the project's scope and focus (which will be in predominantly rural sites and urban centres), the proposed scope of works, and the absence of appropriate institutional structures to manage risks, weak mitigation, monitoring and reporting systems and low absorption capacity. The risk of sexual violence or assault may also increase while travelling long distances to reach institutions of higher learning supported under this project, including the National Women's University Campus in Hargeisa. Other factors such as unequal gender and power relations can exacerbate the risks of gender-based violence (GBV) in institutions of learning especially where unethical institution administrators and/or teachers take advantage of their positions and sexually exploit female students. There is also potential of sexual harassment for female teachers working in the project-supported institutions.

18. The renovation activities to be implemented by the project will be guided by an Emergency Response Plan (ERP) that will be developed by the PIU team with the support of the Environment Specialist (who shall be the coordinator of the ERP), Occupational Safety and Health Officers, Public Health Officers (PHOs), Contractors and the Ministry of Education. The PIU will attach responsibilities of Emergency Preparedness to the Environmental Specialist, who will be the main contact for the MoES in an emergency case and one of the university security/safety officers on site will be trained to handle such cases during operating phase. The ERP will include engineering controls (such as containment, automatic alarms, and shut-off systems) proportionate to the nature and scale of the hazards identified at the workplace or renovation sites, identification of, and secure access to, emergency equipment available on-site and nearby, and appropriate notification procedures for both project workers, stakeholders and designated emergency responders. The plan shall also include the use of diverse media channels for notification of the affected community and other stakeholders, as well as training programs for emergency responders including drills at regular intervals. The project workers will be apprised of public evacuation procedures, and furnished with the contact details of the designated coordinator for ERP implementation (i.e., the project's Environmental Specialist). The plan shall also highlight the measures for restoration and clean-up of the environment following any major accident.

19. All project workers will sign a code of conduct (CoC) that will stipulate their key responsibilities and entitlements. The CoC will be translated into Somali language. And for those not able to read and/or write, the CoC will be read out to them before they sign. In addition, there will be an abbreviated CoC (focusing on behaviour at work) that will be printed and pasted in common areas for ease of reference. There will be continuous sensitization sessions for workers and communities on the social impacts and mitigation measures.

Grievance Management

20. A grievance structure will be established for project workers (direct workers and contracted/supply workers), as required under ESS2. Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. For civil servants, the government established mechanisms of resolving conflict and grievances at the workplace will be utilized. However, when an aggrieved direct worker wishes to escalate his/her issues or raise concerns anonymously and/or to a person other than his/her immediate supervisor/hiring unit, the worker may raise the issues with the PIU or use the Project GM. Where contractors have an existing grievance system, their direct workers should use such a mechanism, given that it fulfils GM requirements of the WB (and this LMP), but the mechanism should be made known to the PIU as part of the documentation submitted on labour management.

21. The project will have several channels for work-related complaints and grievances including email, phone calls, texts, and letter writing, and toll-free line that will also be accessible to all workers. Information on the Workers GM will be made available to workers by the social specialists at all worksites, government offices and community level to ensure that all workers have adequate information on how to lodge a complaint and whom to direct it to. Confidentiality and whistle blower protection will be assured when handling workers' grievances (although admittedly it would be

difficult to resolve the issue if the worker remains anonymous throughout the process).

Labour Institutional Framework

22. The Ministry of Employment, Social Affairs and Family (MESAF) is responsible for labour policy and regulatory frameworks. The Labour Ministry is in charge of implementing the Labour Code, including labour inspection. Others have no functioning labour inspection. While the new government established under the Somaliland Constitution is still nascent, there is a significant gap in the implementation of the Labour Code. Given more than two decades of civil war and conflict, the government is developing its capacity to address diverse issues including labour. The MESAF has been recently developing labour and social protection policies.

Key Policies and Procedures

23. The policies and procedures outlined in the LMP include: (i) recruitment and replacement; (ii) occupational health and safety procedure; (iii) labour influx; (iv) management of GBV/SEA; (v) project management; (vi) age of employment; (vii) contractor management; The Somaliland Government, as well as contractors, and all project workers will follow these procedures in ensuring the full accomplishment of the objectives of ESS2, and the national labour laws. The procedures will be reviewed from time to time and amended accordingly. Whenever the Somaliland Government has done changes to the Labour Code, these will need to be reflected in the Labour Management Plans to be developed for the subprojects. It is notable that due to the limited capacity on labour management in Somaliland, the project will provide additional technical support through consultancy services, on need basis.

24. All project workers will sign a code of conduct (CoC) that will stipulate their key responsibilities and entitlements. The CoC will be translated into Somali language. And for those not able to read and/or write, the CoC will be read out to them before they sign. In addition, there will be an abbreviated CoC (focusing on behaviour at work) that will be printed and pasted in common areas for ease of reference. There will be continuous sensitization sessions for workers and communities on the social impacts and mitigation measures.

Implementation of the LMP

25. The PIU will be responsible for the overall project management and coordination, including compliance with safeguards requirements such as those contained herein. The PIU will engage consultants, as necessary, with expertise in environmental, social, OHS issues, public health, security, GBV and will work closely with other government officers including the Labour Inspectorate, and Safety and Health Officers. The social and environmental specialists on the PIU will be responsible for promoting the implementation of the LMP and OHS requirements within the project.

1. INTRODUCTION

1.1. Project Background

26. The challenges facing adolescent girls and women in Somaliland are substantial and limit their ability to live healthy and productive lives, fulfill their potential, and contribute to the country's growth. More than one quarter (27 percent) of girls and women aged 20-24 give birth before their 18th birthday, which contributes to high overall fertility as well as increased likelihood of low-birthweight babies and stunting in early childhood. Less than one quarter (24 percent) of all women receive four or more antenatal care visits, and the maternal mortality ratio is high, at 829 per 100,000 live births, as is the under-five mortality rate of 115 per 100,000 live births. Across the country, an estimated 56 percent of women aged 15 years or older cannot read, compared to 41 percent of men, and more than half of all females aged 15 to 29 years (57 percent) are neither at work nor in school/training, compared to 39 percent for males. Gender-based violence (GBV) is widespread: according to one survey, 36 percent of adult women experienced intimate partner violence (IPV) and 62 percent reported undergoing Female Genital Mutilation/Cutting (FGM/C) in their lifetime. The cumulative effects of underinvestment, lack of opportunity, and violence traps women in a vicious cycle of under-empowerment that impacts their capacity to participate in society, engage in productive employment and support their families.

27. With the right investments in its people – particularly in educating girls and women – Somaliland has the opportunity to capture a demographic dividend. Despite current low levels of literacy and access to education, investment in Somaliland's youthful population could yield a high return, especially if girls and women who have been left behind by the formal education system could benefit from second chance education and new opportunities. Timely and effective investments in human capital for girls and women also hold the promise of reducing the intergenerational transmission of poverty. International evidence from a range of contexts confirms that increasing girls' and women's access to education and earning potential will reduce fertility levels and improve women's and children's outcomes through multiple channels, including increased autonomy and bargaining power in family formation, greater earning power and improved status, increased child survival and investments in children's health and education. Boosting women's economic empowerment is essential to achieve economic growth, shared prosperity, and social stability in Somaliland.

28. The Raja Kaaba Project engages and supports the Government of Somaliland (side-by-side with the parent project at the Federal Government of Somalia's level) and makes targeted investments in the education sector with an emphasis on girls and women. The project aims to enhance the conditions for women's empowerment through improved literacy and numeracy skills, skills for income generation, and skills for leadership, which is well expressed in the project's development objective.

1.2. Project Objectives and Components

Project Objectives

29. The Project Development Objective (PDO) is to enhance the conditions for women's empowerment through improved literacy and numeracy skills, and skills for leadership. PDO Level Indicators

- Change in basic proficiency rates in literacy and numeracy in the targeted population of second chance programs (percentage, disaggregated by gender).
- Beneficiaries obtaining skills qualification related to labor market needs or livelihood (number, disaggregated by gender).
- Female graduates of Women's University programs in leadership roles (cumulative, disaggregated by disability status).

Project Components

30. **Component 1: Skills for Life and Labor Market Success:** seeks to address gaps in access to essential skills – including basic literacy and numeracy skills, skills for income generation, and crosscutting life skills – for girls and women. Specific sectors for support will be guided by demand and labour dynamics and in consultation with regional authorities, existing institutions, civil society and employers. Component 1 will support the creation of a competitive Skills Development Fund (SDF) and finance service delivery through it. A skills fund is a centrally managed process to award contracts to organizations and institutions to deliver skills training in line with the objectives and guidelines of the Fund. In Somaliland, the SDF will be primarily managed at the federal level with a Grant Committee that includes FGS and Somaliland, in addition to FMS representatives, stakeholders from civil society, and representatives of the private sector. The Grant Committee will report to the project Steering Committee, oversee the Fund's operations, and make the final decisions on which grant applications to support. The Project will also establish and finance the SDF secretariat, which will manage the grant making process centrally.

31. **Component 2: Higher Education for Women's Leadership:** will finance interventions that will help more women acquire the competencies, qualifications, confidence, and networks to advance into postsecondary education and more capably step into leadership roles including in government, politics, public service, business, education, and civil society. Through this component, the Government of Somaliland will expand opportunities for women through the establishment of women's development centers (WDCs) and take the first steps in creating a consortium of autonomous women's colleges to support a system-wide expansion of women's higher-level skills and leadership development. Existing educational campuses and facilities will be renovated and utilized for the establishment of Women Universities. Alongside these campuses the WDCs will also serve as administrative hosts, offering fee-free physical and virtual safe spaces to support women's leadership and empowerment and offering diverse programming, including mentorship and peer support; technical and professional women-centered short courses; special events and opportunities for networking; and, foundational courses for advancing-higher skills development. Beneficiaries will include women with some level of post-secondary education and girls and women needing additional preparation to be ready for admission to and progression through higher education. Additionally, the government will take the first steps in creating an autonomous or semi-autonomous Somaliland Women's University (SWU) campus in Hargeisa that will serve as the institutional hub for a system-wide expansion of women's leadership development through participation in higher education. The principal aim of the SWU would be to provide Somaliland girls and women from all walks of life with strong academic potential with access to a dedicated, safe, and well-resourced higher education opportunity through which they can develop the knowledge, qualifications, and abilities to serve effectively in high-skilled employment and in leadership roles in politics, government, and the world of business. This university will serve two key strategic goals identified by the Government of Somaliland as of national importance: (i) increasing the number of women with the high-level skills needed to serve at the highest levels of leadership in Somaliland, including in the Parliament, where there is a national target already set to reach and maintain 30 percent female representation by the next parliamentary election cycle; and (ii) expanding opportunities for women to hone the academic learning and research skills needed to proceed through increasingly advanced levels of post-secondary education, including through Master's and Doctoral level studies, particularly in science, technology, engineering and math (STEM) fields.

32. Initial implementation activities will consist of utilizing existing facilities and academic programs at selected institution(s) to implement women-centered short courses and foundational courses for upskilling and preparing girls/women for university. Independent one campus would be established by the close of the project, with possibilities for expansion beyond the life of the project. SWU would be independent of any umbrella university and would have one suggested location in Hargeisa/Somaliland, likely adjacent to or within one of the existing public universities. Component 2 will also help the government build the strategy and policy framework to support, sustain, and grow

pathways for Somaliland women to engage in and benefit from higher education and leadership support.

33. ***Component 3: Systems Strengthening, Technical Assistance and Project Management*** will provide resources to support the project implementation by strengthening the management capacity of the Ministry of Education and Science's staff as well as district level education administrators. Financing to be provided under this component will support staffing of key project staff at the state levels, capacity building and training activities, operating costs for project management, monitoring, and training programs, office equipment and furniture for project staff.

34. The component will finance the development of a robust system for collection and utilization of data on NFE, TVET, and higher education, with an emphasis on tracking gender gaps and informing the subsequent development of strategic policies and plans. The component will also finance cross-cutting technical assistance, including: a comprehensive approach to GBV prevention, risk mitigation and response, building on the GBV prevention and mitigation activities under the SEHCD Project; development of a national strategy on gender in higher education for Somaliland; and pilot studies, qualitative evaluations, and impact evaluations on the innovative activities developed under both Components 1 and 2.

1.3. Project Beneficiaries and Target Population

35. The Project is expected to benefit and empower women and girls through enhanced literacy and numeracy skills, skills for income generation, skills for leadership and systems strengthening. During the implementation period, under Component 1, the project is expected to benefit less than 50,000 young women aged 15-35 from primarily marginalized and vulnerable populations, including from IDP communities, in the targeted districts in Somaliland, specifically covering Maroodi Jeeh, Togdheer and /or Sanaag regions. Component 1 will directly benefit these beneficiaries through non-formal second-chance programs focused on functional literacy and numeracy, livelihoods, and sector-specific skills and labor market qualifications. Under Component 2, nearly 300 - 400 women will directly benefit from WDCs with short-courses, mentorship and leadership development opportunities and the consortium of women's colleges will be established to offer certificate and degree programs. Across components, it is expected that at least 10 percent of beneficiaries will be persons with disabilities.

36. The project will be implemented in targeted districts across Somaliland screened to ensure that they meet a threshold of need, defined by female literacy levels and/or the presence of vulnerable populations such as IDPs. Initially targeted districts included Hargaisa and Burao in Maroodi-Jeex and Togdheer, respectively, in addition to one alternative district (Erigavo in Saanag Region). Direct project beneficiaries are women and girls primarily and may, in some target districts include disadvantaged boys and men all from primarily marginalized and disadvantaged populations. The selection criteria will include;

- i. two target districts and one alternate district in Somaliland,
- ii. demand from regional and district officials,
- iii. accessibility for government supervision,
- iv. capacity to implement the programs,
- v. availability of complementary demand-side interventions such as cash transfer programs, and
- vi. avoiding duplication with similar programs, such as the FCDO-financed AGES program

1.4. Labour Management Procedures of the World Bank

37. This LMP lays out the project's approach to meeting national requirements, as well as the objectives of the World Bank's Environmental and Social Framework (ESF), specifically

“Environmental and Social Standard 2 (ESS2): “Labour and Working Conditions”. The LMP is aimed at recognizing the centrality of fairness, non-discrimination and equal opportunity among workers and also aim at protection of workers against all sorts of injuries, discrimination, unfair treatment and avoid attraction of child and forced labour, GBV and SEAH related risks among others. It will equally elaborate on importance and ways of promoting safety, adequate supervision and enhanced capacity through the implementation of a systematic approach build on strict compliance, adequate reporting, defined roles, proper supervision, and training that will improve the management of risks and impacts related to labour and working conditions in the proposed project. Generally, the procedures identify the ways in which national law and the requirements of ESS2 will be applied to the project.

38. The LMP is to be applied with due consideration to the requirements of national laws, the interrelatedness of ESS2 with other ESSs in general, and ESS4 in particular. ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers are expected to promote fairness, protect project workers and especially the vulnerable including women, children, marginalized groups, person with disabilities, and promote freedom of association among project workers. People considered vulnerable are expected to be accorded additional support. The ESS4 is concerned with potential E&S risks and impacts on community health and safety that are associated with the Project activities. The LMP will be applicable to all workers and employees working under the project including project implementation partners, and suppliers with the exclusion of civil servants/government unless there is legal transfer of the contract or engagement to this project and within the provisions of the ESS2. LMP is also applicable to community health and safety at some points where interaction between project workers and the surrounding community may occur, possibly leading to negative E&S risks and impacts. This includes labor influx and deployment of security personnel, for instance.

39. The LMP sets out the terms and conditions of employment for employing or engaging workers on the project. It also specifies the requirements and standards to be met and policies and procedures to be followed, as well as processes for assessing risks and implementation of compliance measures. The LMP is developed to help avoid, mitigate, and manage risks and impacts in relation to project workers and ensure non-discrimination, equal opportunity, protection, fair treatment, and safe and healthy working conditions.

40. The LMP is a living document to facilitate project planning, preparation, and implementation. It is anticipated that the LMP will be updated as additional information becomes available during project implementation, including in relation to project implementation partners (PIP) to be onboarded, workforce numbers and requirements, timing of project activities, and associated due diligence and social risk management.

41. Before the implementation of civil works activities on the ground, the government of Somaliland will oversee the development of two Environmental and Social Management Standards. A standard (base) ESMP will be developed for the renovation of the university campuses, while a different standard ESMP will be developed during operation and maintenance activities. The standard ESMP will then be modified/enhanced based upon the subproject screening (and any other additional activity) and be used as a requirement for contractors (including a base for their C-ESMP). Similarly, the standard operation phase ESMP will also be modified/enhanced based upon the actual conditions (design, location, services, etc.) of an individual school prior to the end of renovation. The C-ESMP and operation phase ESMP will equally be developed in case the project will undertake rehabilitation of WDCs. These standard ESMPs will be presented to the World Bank for review and clearance and will help ensure consistency and adequacy (completeness, details) among individual schools/subprojects. Both ESMPs should be developed at different stages of the project and shall include necessary context-relevant mitigation measures for identified occupational health and safety risks.

2. LEGAL AND REGULATORY REQUIREMENTS

2.1. The Constitution of the Republic of Somaliland

42. The Constitution of the Republic of Somaliland (adopted on 31 May 2001) provides the legislative framework for labor issues. The Somaliland Constitution makes the following provisions the foundational bases on Labour issues in Somaliland. On the legislative front, the legal regime is divided into four categories. Legislation governing private entities and enterprises, legislation governing civil servants, legislation governing the local government officials and legislation governing judiciary, prosecutorial services and the military. The Somaliland Constitution makes the following provisions on Labour in Article 20:

- The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.
- All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited.
- The State shall endeavor to create understanding and clear rights between employees and employers and shall accordingly introduce a law in this respect.
- The State shall promote the support systems, insurance and safety of employees and shall strengthen the relevant responsible bodies.

43. Further, the right to form trade unions is part of the right to freedom of association, but is specifically mentioned in Article 22(1) of the International Covenant on Civil and Political Rights (ICCPR). This right is also covered by ILO Conventions, such as the freedom of association and Protection of the Right to Organise Convention 1948 and the Right to Organise and Collective Bargaining Convention 1949.

44. Social security, pension and special allowances: (i) social security, compensation for service-incurred death, illness or injury, pensions and other related benefits, subsistence allowance for special services shall be established by separate laws; (ii) until otherwise provided by law, the benefits referred to the preceding paragraph, shall continue to be governed by the existing laws and the time of entry into force of this law.

2.2. Brief Overview of Labour Legislation: Terms and Conditions and work conditions

45. The Somaliland Labour/Employment Law (Amendments 2020) is the law governing all aspects of labour and working conditions for non-civil servants in Somaliland. The law covers the contract of employment, terms and conditions, remuneration, and OHS, trade unions and labour authorities. This Law applies to all project workers. The law is broadly consistent with the ESS2, although there is a significant gap in the enforcement aspects of the legislation.

46. Somaliland Civil Servants Law No. 7/96 is the main law that governs the conditions of employment of civil servants. This Law, which was issued under the 1993 Somaliland National Charter (which did NOT allow for the use of any post-1969 Somali Republic Dictatorship era legislation), was based on the 1962 Civil Service Law. The 1962 law was subsequently amended many times and the last pre-1991 Somali Republic Civil Service Law was Law No. 5 of 2/2/1980 which purported to cover all public employees (including public industrial workers) and which was no longer applicable to Somaliland. The 1996 Somaliland Civil Service Law covers permanent civil

servants and does not apply to local government employees and to members of the armed forces or the police and corrections corps (see section 2). The law No. 7/96 has been recently amended and approved by the Cabinet and Parliament.

47. Local Government Employees: Section 59(4) of the Regions and Districts Law (Law No. 22/2002, as amended) states that local government (and water agencies) employees shall have a separate law which shall be prepared by the Ministry of Interior and approved by the “Councils”. The last pre-1991 Regulations, which specifically addressed separately local government employees, were the Local Government Regulations 1973 - Decree No. 4 of 15 July 1973, which were slightly amended by Decree No. 116 of 5 September 1974. The Somaliland 1997 Interim Constitution and the final 2000 Constitution both included a provision which allowed the continued use of pre-1993 Somali Republic laws, which are not in conflict with the Somaliland Constitution, fundamental human rights and freedoms and Sharia until new laws are promulgated.

48. There are separate laws governing the employment conditions of the Armed Forces; Police, the Corrections Corps and Immigration Services; and the Judiciary and the Prosecution Service. The Somaliland Constitution makes the following provisions on Labour in Section 20:

- The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law (2).
- All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited (3).
- The State shall endeavor to create understanding and clear rights between employees and employers and shall accordingly introduce a law (in this respect) (4).
- The State shall promote the support systems, insurance and safety of employees and shall strengthen the relevant responsible bodies (6). Further, the right to form trade unions is part of the right of freedom of association, but is specifically mentioned in Section 22(1) of the International Covenant on Civil and Political Rights (ICCPR). This right is also covered by ILO Conventions, such as the freedom of association and Protection of the Right to Organise Convention 1948 and the Right to Organise and Collective Bargaining Convention 1949 (footnote 51).
- Social security, pension and special allowances: (i) social security, compensation for service-incurred death, illness or injury, pensions and other related benefits, subsistence allowance for special services shall be established by separate laws; (ii) until otherwise provided by law, the benefits referred to the preceding paragraph, shall continue to be governed by the existing laws and the time of entry into force of this law.

49. Somaliland Labour/Employment Law stipulates that all employment contracts must include: (i) the nature and duration of the contract; (ii) the hours and place of work; (iii) the remuneration payable to the worker; and (iv) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent Labour Inspector for pre-approval. In regard to OHS standards, the employer is obligated to provide adequate measures for health and safety, protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

50. The Law further forbids work for children below the age of 15 but allows employment of children between the age of 15-18, but employment has to be compatible with proper protection, health and the moral of children.

51. The Labour Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions. The Code stipulates the right to equal pay for the same work as men and paid maternity leave. Women are entitled to 14 weeks of maternity leave at half pay.

52. Section 25 of the Civil Servants Law stipulates that “No official shall be subject to disciplinary proceedings except in accordance with the provisions of this chapter (2)”. Without prejudice to any civil or criminal proceedings to which he/she may have rendered himself/herself liable, an official who ceases to fulfil or violates any of the provisions of this law or regulations made hereunder shall be dealt with: a) By a ministerial Disciplinary Board, or b) By a National Disciplinary Board.

53. Section 26 of the Civil Servants Law under (Ministerial Disciplinary Board 1), stipulates that “As and when required, a Ministerial Disciplinary Board may be established and convened by: a) Director General or other official in executive control of a Unit; b) Head of Somaliland Mission abroad; c) Regional Governor/mayor. For trial of officials subordinate to them for offences. 2. The Board shall consist of three members including the Chairman who shall be the Director General or other official in executive control of a Unit, Head of Somaliland, Diplomatic Mission Abroad or the Regional Governor/Mayor, as the case may be, or an official holding a post in Division A, Grade A5, or above delegated by any of them. The other two members shall be officials in a grade not lower than that of the offending official and in no case lower than Division C grade C7. 3. The board shall have the power to try offences committed by officials other than the officials triable by the National Disciplinary Board”.

54. Section 27 under (National Disciplinary Board 1) stipulates that, “The National Disciplinary Board for the Civil Service shall consist of a President and nine members appointed for a period of two years by the President on the proposal of the commission, approved by the Council of Ministers. 2. Five members shall constitute the quorum for meetings of the Board, where there is an even number of votes, the president shall have the casting vote. 3. Where a member of the Board has brought the charge in his capacity as superior official, he shall not participate in the proceeding as a member of the Board. 4. The board shall have the power to impose penalties as set out in paragraph 1 of Section 28. 5. All decisions of the board relating to (g and h) in paragraph 1, of section 28, shall be subject to the confirmation of council of Ministers”.

2.3. Brief Overview of Labour Legislation: Occupational Health and Safety (OHS)

55. The Labour Law 2021⁵ covers protection against risks to the workers, notification procedures in occupational accidents, medical requirements at site and conveyance of injured workers to the hospitals, among others. Below is the list of relevant provisions of the Labour Code with regard to OHS.

56. The Labour Code covers protection against risks to workers, notification procedures in occupational accidents, medical requirements at site and conveyance of injured workers to hospitals, among others. Below is the list of relevant provisions of the Labour Code with regard to OHS.

57. Protection against possible risks (Article 101): All factories, workshops and other workplaces shall be built, installed, equipped and managed in such a way that the workers are properly protected against possible risks. For this purpose, the employer shall:

- i. maintain a perfect state of safety and hygiene to avoid risks of accident or damage to health;
- ii. take suitable measures to prevent contamination of work-places from toxic gases, vapours, dust, fumes, mists and other emanations;
- iii. provide sufficient and suitable toilet and washing facilities, separate for male and female workers;
- iv. provide an adequate supply of drinking water easily accessible to all workers;
- v. maintain fire-fighting appliances and staff trained in their use;
- vi. provide the necessary safety appliance adapted machinery and plant;

⁵ The Somaliland Labour/Employment Law matters on Health which are contained in Sec. 41 – 45 but this is not yet available in English. However, since the provisions are aligned to the provisions made in the Labour Code 1972, we shall reference this here until we get a translated version (or the text will be amended with the help of the MESAF team).

- vii. maintain machinery, electrical and mechanical plants, instruments and tools in good condition to ensure safety;
 - viii. provide suitable installations for the removal of refuse and drainage of residual waters;
 - ix. take the necessary precautions in his/her establishment to protect the life, health and
 - x. morality of the workers;
 - xi. ensure that his/her staff receive the necessary instructions for the prevention of industrial accident, occupational diseases and other risks inherent in their occupations;
 - xii. post up in conspicuous parts of the workplaces notices explaining clearly the obligations of the workers to observe safety rules, and visual signs indicating dangerous places;
 - xiii. supply the workers with the apparatus and instruments to guard against the risks inherent in the workplace; and
 - xiv. take steps to provide the necessary first aid in urgent cases to workers involved in accidents or falling sick during working hours.
58. Notification of industrial accidents and occupational diseases (Article 102): The employer shall immediately notify the competent labour inspectorate of all accidents resulting in injury or death and occupational diseases.
59. Medical facilities (Article 103): Every undertaking normally employing more than ten workers at the single centre shall maintain a first-aid chest.
60. Conveyance of injured and sick workers (Article 104): It shall be the duty of the employer to arrange, at his/her own expense, for the conveyance to the nearest hospital of any injured or sick worker who can be so conveyed and who cannot be treated on the spot with the means available.
61. The PIU will also make reference to applicable international conventions, and directives for addressing health and safety issues relevant to COVID-19 and other infections that might occur during the project period, including:
- i. ILO Occupational Safety and Health Convention, 1981 (No. 155);
 - ii. ILO Occupational Health Services Convention, 1985 (No. 161);
 - iii. ILO Safety and Health in Construction Convention, 1988 (No. 167);
 - iv. WHO International Health Regulations, 2005;
 - v. WHO Emergency Response Framework, 2017; and
 - vi. EU OSH Framework Directive (Directive 89/391).
62. Somaliland, like all countries, could be faced by COVID-19 pandemic. Given the understanding that COVID-19 may be here for a long time, it is critical that all project teams continue to take precautions against the pandemic. Protection against possible COVID-19 risks will be managed through:
- i. arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of equipment and materials;
 - ii. ensuring that workers or suppliers participate in the application of Infection Prevention and Control (IPC) safety and health measures/guidelines as advised by Ministry of Health Development (MoHD) including availability of hand wash facilities, water and soap, alcohol-based hand sanitizer, and social distancing;
 - iii. training all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves (respiratory hygiene, cough etiquette and hand hygiene) and the need to be tested if they have symptoms;

- iv. provision of such information, instructions, training and supervision as is necessary to ensure the safety and health at work of every worker or supplier;
- v. ensuring that all workers and visitors accessing work sites every day or attending meetings are subjected to rapid COVID-19 screening, which may include temperature check and/or other vital signs;
- vi. ensuring that any worker showing symptoms of respiratory illness (cold or cough) and/or who has potentially been exposed to COVID-19 should be immediately removed from work and tested for the virus at the nearest hospital/health facility and self-isolate as required;
- vii. identification by the project management the closest hospital/health facility that has testing facilities in place to refer workers/staff;
- viii. ensuring that persons under investigation for COVID-19 do not return to work at the project site until cleared by test results. During this time, they should continue to be paid their wages; unless the symptoms remain persistent for more than one month;
- ix. putting measures to ensure that if project workers live at home, any worker with a family member who has a confirmed or suspected case of COVID-19 is quarantined from the project site for 14 days (or according to government directives), and continued to be paid wages, even if he/she has no symptoms;
- x. using existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe cough with fever, and do not voluntarily submit to testing;
- xi. mandatory provision and use of appropriate PPE for all project personnel including workers and visitors;
- xii. avoidance of concentration of more than 15 workers at one location. Where there is a gathering of more than one person, social distancing of at least 2 meters shall be maintained and use of masks as required;
- xiii. restricting the number of people accessing the work areas;
- xiv. fumigation of offices, work areas and project vehicles delivering equipment and materials to schools and training centers;
- xv. training of cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoES offices and schools;
- xvi. encouraging workers to take up the COVID-19 vaccination offered by the government or private entities where possible; and
- xvii. adherence to any other National guidelines on COVID-19 as well as WB guidelines.

2.4. Relevant International Conventions

63. Somaliland has now become an active member of the International Labour Organization (ILO) since Somali has ratified a total of 6 out of 8 fundamental conventions. Out of the total 26 conventions foundational, technical and governance ratified, 16 are in force and additional 6 came into effect on 8th March 2021, these include: Tripartite Consultation (International Labour Standards) Convention 1976 (No 144), Occupational Safety and health Convention (1981) No 155, Promotional Framework for Occupational Safety and Health Convention (2006) (No. 187), Violence and harassment Convention 2019 (No 190). Convention, Migration for Employment Convention (1949) (No. 97), and Private Employment Agencies Convention 1997 (No 181) migration for Employment Convention (Revision) 1949 (No. 97). In addition, the following instruments of the ILO are applicable in Somaliland:

- i. Freedom of Association and Protection of the Right to Organize (ILO Convention 87);
- ii. The Right to Organize and Collective Bargaining (ILO Convention 98);

- iii. Forced Labour (ILO Convention 29);
- iv. The Abolition of Forced Labour (ILO Convention 105);
- v. The Worst Forms of Child Labour (ILO Convention 182); and
- vi. Discrimination (Employment and Occupation) (ILO Convention 111).

2.5. World Bank Requirements for Labour Management Procedures

ESS2: Labour and Working Conditions

64. The World Bank requirements on labour as well as Occupational Health and Safety (OHS) Concerns are outlined in Environment and Social Standard (ESS2) as well as in the Bank's General Guidelines for Environmental Health and Safety. The ESS2 recognizes the centrality of fairness, non-discrimination and equal opportunity among workers. Also, protection of workers since worksites may attract child and forced labour. ESS2 requires the Borrower to develop an LMP which sets out the way in which project workers will be managed, in accordance with the requirements of national law and ESS2 and which should specifically address:

- i. Promotion of safety and health at work, the fair treatment, non-discrimination, and equal opportunity of project workers.
- ii. Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- iii. Prevent the use of all forms of forced labor and child labor.
- iv. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- v. Provide project workers with accessible means to raise workplace concerns. The procedures address the way in which the LMP will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties to manage their workers.

65. OHS concerns have been identified as a potential risk associated with the Project activities. Therefore, this LMP includes measures to address OHS risks. The purpose of the LMP as per the ESS2 is to describe how the Project Implementation Unit (PIU) at the Somaliland national level, together with the Project Management Unit (PMU) at the Federal level, will manage all project workers in relation to the associated risks and impacts. The LMP will be the guide in managing the labour-related social and environmental risks, and all the subprojects (specifically University campus implementation and operations) will manage their risk in accordance with the LMP in ensuring that they remain within the aspects and requirements of the OHS as provided for in the WBG EHS General Guidelines.

66. Being a fragile state with very limited capacity to enforce and implement labour laws and regulations, implementing the ESS2 will be challenging. There is overwhelming evidence suggesting the fragility of the system and how the lack of or inadequate implementation of ESS2 might evoke extreme cases of patronage, nepotism, and discrimination. Given that there could be areas with potential for conflict albeit intermittently, the possibility of children being forced to engage in labour as bread winners or are taken into forced labour, remains a probability. Given the high level of poverty, complicated with elements of state capture by strong and well-placed individuals, potential cases of forced labour remain a possibility. Additionally, natural disasters like floods often bring displacement of huge number of people, which disrupts their production systems, economic livelihoods and social safety nets forcing most of the people to relocate to other areas. These shocks expose some people, especially girls and women to sexual harassment and exploitation. Inter and intra-community clashes and conflict might probably arise due to labour inflows, cases of

discrimination and loss of opportunities.

67. The World Bank ESS2 demands fair and equitable labour relations to avert or minimize labour related negative impacts. People considered vulnerable due to their distinct physical features, clan affiliations, gender, economic position or disability need additional support.

Table 4: The Gap Analysis of the FGS Legal Framework and the ESS2

Comparison between WB ESS2 requirements and FGS Requirements				
	ESS2	FGS Laws	Gaps	Mitigation Measures
Objectives	<p>To promote safety and health at work.</p> <p>-To promote the fair treatment, non-discrimination, and equal opportunity of project workers.</p> <p>-To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.</p> <p>-To prevent the use of all forms of forced labor and child labor.</p> <p>-To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.</p> <p>-To provide project workers with accessible means to raise workplace concerns.</p>	<p>To bring the existing laws in line with the socialist ideology</p> <p>- To regulate the labour relations in the interest of the development of national economy</p> <p>- Participation of workers in the planning and management of enterprises; and</p> <p>-To the bitterness of terms and conditions of workers.</p>	<p>The objectives of the labour code are as good but will be complemented by the ESS2.</p>	<p>The ESS2 objectives will be given priority.</p>
Classification	<p>The ESS has an elaborate classification of workers including, direct workers, contracted workers, community workers and primary supply workers</p>	<p>The regulation broadly defines the worker. It covers anyone who undertakes for return of remuneration to perform manual or non-manual work for an employer</p>	<p>Does not cover community worker if unpaid or primary supplier's workers</p>	<p>The ESS 2 classification will be used where needed.</p>
Terms and Conditions	<p>Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of</p>	<p>Art 46 provides for employment contract that should have necessary information about nature and duration, name of the worker, remuneration,</p>	<p>Does not capture issues related to overtime, frequency of payment or rest per week. These issues are handled separately in</p>	<p>The ESS2 will be applicable.</p>

Comparison between WB ESS2 requirements and FGS Requirements				
	ESS2	FGS Laws	Gaps	Mitigation Measures
	employment.	hours and place of work and suspension and termination procedure. The contract must be approved by the district labour inspector for it to be valid.	different parts in the Code. ESS2 will supplement the gap in the code through this LMP document.	
Child labour	The ESS2 is clear that the working age for anyone in the bank's project is 18 years and above.	The Labour Code 1972 allows children of 15 years to work and makes special provisions for workers aged 18 years and below.	The labour Code is inconsistent with the ESS2, the World Bank standards will apply.	The ESS2 will be applicable.
Use of forced labour	The ESS2 provides for voluntary consent of all project workers and disallows the use of forced labour across the bank's project.	The labour code provides for free and voluntary consent and prohibits the use of forced labour. However, compliance and enforcement of such measures are weak.	The code is not very robust and lacks strong enforcement mechanism.	The principles of ESS2 will be applicable.
Non-Discrimination	Decisions relating to the employment or treatment of project workers will not be made based on personal characteristics unrelated to inherent job requirements.	Article 3 provides that everyone has a right to equality of opportunity and treatment in respect of employment and occupation. Without discrimination.	The Article is consistent with ESS2.	The ESS2 will supplement where applicable.
GBV SEA/SH and GM	The ESS2 provides for the establishment of an elaborate GM for all project workers and provides for the protection of workers against all form sexual abuse, exploitation and harassment within the work environment	The Code does not provide for the protection against the sexual abuse and harassment. There is not clear mechanism for GM.	There are no adequate provisions to safeguard the victims of sexual violence and a proper GM mechanism.	The ESS2 will be applicable.
Workers' Organization	The ESS2 respects existing structures of labour organizations and where they are nonexistence does not discourage anyone to organize	The Act provides for registration, organization and working of the labour organizations.	The code is not as robust and lacks details.	The principles of ESS2 will be applicable.
Occupational health and safety	The OHS measures will be designed and implemented to address: (a) identification of potential hazards to project workers, particularly those that	The Act provides for OHS substantially and covers aspects mentioned in ESS2 but	The Code fails to establish means of identifying the hazard and compensation.	The gap in the act will be supplemented by ESS2, and ESS4 through this LMP document.

Comparison between WB ESS2 requirements and FGS Requirements				
	ESS2	FGS Laws	Gaps	Mitigation Measures
	<p>may be life threatening; (b) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, deaths, disability and disease</p>			

3. OVERVIEW OF LABOUR USE ON THE PROJECT

68. The LMP will be administered to the different categories of project workers as defined below and summarized in Table 5. While the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) will be determined during the implementation of each subproject, the project workers engaged or employed will include: direct workers, contracted workers, primary suppliers workers, community workers and civil servants as described below.

69. Direct workers. Include workers directly employed by the PIU. It includes staff in Project Implementation Unit (PIU), which include social safeguard specialist, environmental specialist, GBV specialist, and security specialist. The PIU will be established at the member state level and will equally have a social safeguard, environmental specialist.

70. Contracted workers. these include project implementation partners (PIP), skilled staff of the primary contractors (contractors hired to deliver on the project), skilled workers engaged by sub-contractors (e.g., heavy machine operators), and, immigrant workers engaged by the contractor, and including female workers).

- a. **Primary supply workers.** these will include workers hired to supply services like the PIP offering vocational and market relevant skill training, consultants to provide technical assistance in data system, monitoring and evaluation and capacity building, supply of goods like essential college construction materials such as aggregates and building blocks on an ongoing basis for the project or the equipment needed for ICT.
- b. **Community workers.** This include unskilled community members engaged by the contractors or work through the guidance of their local leaders in the project like civil works activities during limited renovation works (e.g., host community members and IDPs) Although these members may work voluntarily without remuneration, if that is the case, the PIU will ensure their voluntary engagement is not coerced and is well documented. The PIU will also ensure their rights are protected in a way consistent with the ESS2 OHS including security and GBV/SEA measures will apply.
- c. **Civil servants:** Government civil servants (including national and district level staff) who will remain subject to the terms and conditions of their existing public sector employment, although the OHS and GBV/SEA measures outlined in this LMP will apply to them.

71. This LMP will apply to project workers including fulltime, part-time, temporary, seasonal and migrant workers. The LMP contains relevant mitigation measures to be incorporated into procurement documents. It is also aligned to the Environment and Social Management Framework (ESMF), Environment and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP) and Security Management Framework (SMF). Assessment of key potential labour risks.

Table 5: ESS2-Labour and Working conditions and ESS4-Community Health and Safety Risks and Mitigation

Risk	Analysis	Mitigation
<i>Labour and working conditions (ESS2)</i>		
Component 1		
Terms and conditions of employment	The Labour Code 1972 stipulates that remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regard to age, gender and other aspects. The terms of engagement for contractors to undertake activities of training may not be fair, clear, and transparent. The PIP may not have proper transparency with	Project workers will be provided with information and documentation that is clear and understandable regarding their functions, terms and conditions of employment. The information and documentation will set out their rights under national labour and employment law (which will include any applicable collective agreements), including their

Risk	Analysis	Mitigation
	<p>their employees.</p> <p>The ESS2 provides for the promotion of fair treatment, non-discrimination, and equal opportunity of project workers.</p>	<p>rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of ESS2. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.</p> <p>-The documentation will be translated into Somali and read out to workers who may not be literate</p> <p>-The workers will be provided with accessible and safe means to raise workplace concerns. This will be done through the workers' GM under ESS2 and project grievance mechanism as well as formation and joining of collective bargaining bodies</p>
Labour disputes	<p>The contractor and primary suppliers will have workers who will be involved teaching and training, and other amenities, and installation of ICT equipment. Potential labour disputes may arise due to interpretation, application and/or breach of collective bargaining agreement (CBA), individual contract regarding conditions of employment, variation or change of job descriptions (JD), fringe benefits, hours of work, and wages either negotiated or of already agreed terms. Labour disputes may also arise due to disagreements amongst the workers and between workers and the contractors, primary suppliers, and community workers. hours of work, and wages either negotiated or of already agreed terms.</p>	<p>The project shall adhere to the requirements proposed in the project LMP including:</p> <ul style="list-style-type: none"> • Fair terms and conditions shall be applied to all project workers (guided by relevant laws) • The project shall have GMs for project workers (direct workers, contracted workers, primary suppliers and community workers) to promptly address their workplace grievances. The social specialist at the PIU and will ensure the GM is functional accessible. • The project shall respect the workers' right to join labour unions and freedom of association
Discrimination of employment based on gender, disability, or ethnicity	<p>The risk of discriminating based on gender, disability and ethnicity/clannism in recruitment of PIP and PIP employees exists especially at the local level. There is also a risk of bias in the recruitment of teachers, project staff and workers in supported schools.</p>	<p>The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</p> <p>-Contractors will be compelled to offer a written undertaking and commitment to safeguard the interests of women, including ensuring gender parity at the workspace, provide appropriate sanitation facilities at the workplace and appropriate PPE for women and persons with disability (in accordance with WBG's EHSs).</p> <p>-Employees and workers (through a separate Workers' GM) will equally have unfettered access to the GM channel to</p>

Risk	Analysis	Mitigation
		<p>raise their concern</p> <p>-The social specialists will routinely and periodically supervise and monitor the contractor's approach and actions to ensure that no cases of discrimination occur or if they occur, they are addressed immediately through the appropriate channels.</p>
GBV/ SEAH	<p>The project will be targeting girls and boys (TBD) in adolescent stage and training will be conducted by different PIP including within TVET institutions, NGOs and private companies. The risk of sexual assault and harassment remains high in this environment, and violence against participating girls could be high.</p>	<p>The project shall adhere to the measures proposed in the GBV Prevention and Response Action Plan and Stakeholder Engagement Plan (SEP). A GBV Service Provider will be recruited to be responsible for all aspects of prevention and management of GBV. The mitigation measures will include:</p> <ul style="list-style-type: none"> • Sensitize project workers and the MoES staff and beneficiary communities on GBV/SEAH • Sensitize, teachers, trainers and students on GBV/SEAH and the referral pathways • All project personnel to be sensitized on GBV/SEAH as well as the beneficiary communities • The CoC, to be signed by the workers contains provisions on GBV/SEAH
Component 2		
Implementation Phase		
Labour disputes	<p>The contractor and primary suppliers will have workers who will be involved in the renovation of WDC and colleges, training, capacity building, schools and other amenities, and installation of ICT equipment. Potential labour disputes may arise due to interpretation, application and/or breach of collective bargaining agreement (CBA), individual contract regarding conditions of employment, variation or change of job descriptions (JD), fringe benefits, hours of work, and wages either negotiated or of already agreed terms. Labour disputes may also arise due to disagreements amongst the workers and between workers and the contractors, primary suppliers, and community workers. hours of work, and wages either negotiated or of already agreed terms.</p>	<p>The project shall adhere to the requirements proposed in the project LMP including: Fair terms and conditions shall be applied to all project workers (guided by relevant laws)</p> <p>The project shall have GMs for project workers (direct workers, contracted workers, primary suppliers and community workers) to promptly address their workplace grievances.</p> <p>The social specialist at the PIU and will ensure the GM is functional accessible.</p> <p>The project shall respect the workers' right to join labour unions and freedom of association</p>
Labour influx	<p>There is likely to be some minor movement of people from areas outside the project district to provide labour, deliver goods and provide services (such as renovation of WDC university campuses, installation of equipment and training offering catering services. Such movements may result in increased demand and competition for local goods and services, social conflicts within and</p>	<p>Contractors, who may if need be and according to numbers of workers develop camps for workers, will develop Camp/Worksite Management Plans to ensure that the requirements for managing such camps/worksites are adhered to (including restricted entry and exit) and respectful relations with communities in the project area</p> <p>-Contractors shall ensure that all non-</p>

Risk	Analysis	Mitigation
	between communities, increased risk of spread of communicable diseases, and increased rates of illicit behaviour and crime, including GBV cases.	technical work is reserved for local people (identifiable with the host communities and witnessed by host community leadership) -All workers will be required to sign a CoC that will be enforced by all contractors -An abbreviated CoC will be produced and displayed in all facilities and offices implementing and of interest to the project (Annex 1) -Broadly share information among the workers on the availability of safe and accessible GM and the presence of GBV/SEAH focal persons including contacts of the social specialist for the project.
Use of child labour	The Labour Code 1972 prohibits work for children below the age of 15 years and makes special provisions for workers aged 18 years and below. There is a risk of forced labour being used in the renovation of schools (Uni. Campuses) and WDC and MoES offices, where required.	The Project will only allow deployment of workers in line with ESS 2 in all project worker categories – and the project's cutoff age shall be 18 years of age or older for project workers. -The project will require the implementation of age verification procedures by contractors for all its prospective employees, the verification procedure will be shared and verified by the social specialists -The contractor will keep a list of all the workers at the site together with their details including age. These data will be shared periodically and on demand with the PIU and World Bank -The PIU will work closely with the State and District Labour Inspectors to ensure and monitor compliance of the contractor with the Labour code and the ESS2
Use of forced labour	The labour code prohibits forced labour and no one should be forced to work without his consent. There is risk of forced labour especially among the vulnerable communities, IDPs, and women.	All employees will be required to read, understand, and sign the employment agreement and the relevant CoC and for those unable to read, the employment agreement will be read to them in Somali. -All workers will be provided with safe and accessible means to raise workplace concerns using a workplace GM. In addition, the workers could use the project GM. They should also be able to form and join of collective bargaining bodies to air their grievances. -The contractor shall undertake in writing not to accept, directly or indirectly to accept, allow or aide any form of forced labour -Work closely with the State and District Labour Inspectors to ensure that forced work is not provided. -The Social Specialist and the PIU will pay attention to the condition of workers during monitoring and supervisory visits.
GBV SEAH	The risk of GBV and sexual harassment is very high during implementation. The	The mitigation measures will include: • Sensitize project workers and the

Risk	Analysis	Mitigation
	workers could be subjected to such risks especially the vulnerable members of the society.	MoES staff and beneficiary communities on GBV/SEAH <ul style="list-style-type: none"> • Sensitize the communities on GBV/SEAH and the referral pathways • All project personnel to be sensitized on GBV/SEAH as well as the beneficiary communities • The CoC, to be signed by the workers and enforced by the site manager.
Infrastructure and Equipment Design and Safety	Project workers may be affected by accidents or natural hazards, including extreme weather events, during the implementation of funded facilities. Poorly designed infrastructure components can also result in harm to project workers and the larger community. Project workers may be exposed to risks at quarries or excavation works, such as rock falls or hazardous equipment. The workers also stand at risk of using contaminated water and the attendant spread of diseases.	The project will ensure that the design, construction, operation, and decommissioning of infrastructure components shall be in accordance with the EHSs and other GIIP, taking into consideration safety risks to project workers (in addition to third parties and affected communities). The structural elements of the project shall be designed and constructed by competent professionals and certified or approved by competent authorities or professionals. Structural design will take into account climate change considerations, as appropriate.
Discrimination of employment based on gender, disability or ethnicity	The risk of discriminating based on gender, disability and ethnicity/clannism in recruitment exists especially at the local level during the renovation of schools (Uni. Campuses) and offices. There is also a risk of bias in the recruitment of teachers, project staff and workers in supported schools, during operation.	Decisions relating to the employment or treatment of project workers will not be made based on personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. The CoC (see template in Annex 1), to be signed by all workers, is aimed at preventing and addressing harassment, intimidation and/or exploitation. -Contractors will be compelled to offer a written undertaking and commitment to safeguard the interests of women, including ensuring gender parity at the workspace, provide appropriate sanitation facilities at the workplace and appropriate PPE for women and persons with disability (in accordance with WBG's EHSs). -Employees and workers (through a separate Workers' GM) will equally have unfettered access to the GM channel to raise their concern -The social specialists will routinely and periodically supervise and monitor the contractor's approach and actions to ensure that no cases of discrimination occur or if they occur, they are addressed immediately

Risk	Analysis	Mitigation
Safety of Services	Project workers may be exposed to risks arising from emergencies occurring during the project.	through the appropriate channels. The project will need to ensure the use of competent contractors who can mitigate other risks, including electric shock from electrical cabinets or cables or poor waste disposal. The ministry shall also apply the concept of universal access for both project workers and project beneficiaries.
Fire risk	Without provisions for fire safety, there is a risk of fire outbreaks at schools and MoES facilities during renovation works especially in the use of electric hand drills. Fires can start from ignitable materials, cigarette smoking, or old electrical connections malfunctioning.	For each worksite supported by the project, there shall be a risk assessment, which shall evaluate and characterize all relevant risks, including fire and other manmade or natural events/disasters. The project will ensure that the appropriate mitigation measures be included in the ERP and resources provided. MoES shall provide fire suppression facilities including fire extinguishers/fire blankets to the schools and offices supported by the project and ensure the firefighting equipment is serviced as required. -Key staff at the MoES offices and schools shall be trained on basic skills in fire control. -MoES and schools shall prepare site specific emergency response plans (Section I Emergency Response Plan template) of Annex 2 on OHS Requirements for Project Workers and Suppliers, and Annex 6 for the Incident categorization by the World Bank) within one month after the commencement of activities at the schools (Uni. Campuses) and MoES offices
Management of wastes including e-waste and hazardous wastes	Hazardous wastes must be handled or disposed of properly to prevent harm to human health and safety and to the environment. All workers will be required to use PPE (including gloves and masks) which will need to be disposed in line with the provisions of MoH and WHO. There will also be waste from the communication equipment and materials used by the project that would require appropriate disposal	The contractors will follow a Waste Management Plan as part of the C-ESMP, which will be used to ensure that all waste from the project is appropriately disposed. In particular, the project team shall ensure the appropriate management of hazardous waste, including the timely collection, transportation, disposal, and monitoring of wastes disposal sites. The PIU shall ensure that no hazardous wastes are often disposed directly into the environment, posing health and environmental risks. All measures are to be aligned with provisions of the WBG's EHSs. -There will be supervisory site visits by the environmental specialist and the PIU to enforce this requirement
Spread of diseases in communities, including HIV/AIDS and COVID-19 through project activities	The implementation of the project in schools (Uni. Campuses) and in government offices may lead to increased risk of COVID-19 infections. In addition, there is a risk of HIV infections through interactions between and among workers and learners in the existing facilities.	Communication on risks of infection with HIV/AIDS and COVID-19 will be conducted through locally appropriate means – targeting workers, learners, trainers and communities. -The contractors and suppliers will be required to create awareness on HIV/AIDS and COVID-19 among the workers and in

Risk	Analysis	Mitigation
		<p>the communities.</p> <ul style="list-style-type: none"> -The contractors and suppliers will be expected to facilitate the provision of health services to their staff who contract COVID-19 while engaged by the project. -Implementation of the CoC, to be signed by project workers and enforced by all contractors, will also address this risk.
Emergency Preparedness and Response	The emergencies may occur as a result of both natural and man-made hazards, and may be in the form of fires, explosions, leaks, or spills, which may occur for a variety of different reasons, including failure to implement operating	<p>To mitigate this, the project shall, through the Emergency Response Plan, identify and implement measures to address emergency events. The ERP shall comply with ESS4's requirements on ERP as elaborated by the ESF Guidance Note for Community Health and Safety. The project team shall initially develop a standard complete ERP as a base for the first group of supported education facilities, which shall thereafter be modified as needed for other facilities to address their specific conditions and natural and man-made risks/disaster events.</p> <p>The project's Environmental Specialist will be appointed as the coordinator for the ERP and given the necessary training as required</p>
Traffic related hazards	There is high risk associated with traffic and road safety hazards during the operation phase in relation to the collection, supply and delivery of materials and equipment for the project.	<p>Use of competent drivers with defensive driving techniques</p> <ul style="list-style-type: none"> -MoES and responsible field staff shall regularly inspect vehicle safety and maintenance - the details of all vehicles being used for the project shall be recorded and details captured. -Only road worthy vehicles and trucks shall be used in transportation of project equipment and materials to avoid frequent breakdowns and risks of road accidents. This will be done by the Head Driver and contractors in conjunction with PIU's Environment Specialist -All drivers and loaders shall sign the CoC and provide security clearance or a surety from the local community leaders
Insecurity	The main security threats associated with the project include attacks on workers (direct, contract, community, and suppliers) and theft of project materials and equipment. Further, banditry within some regions may pose a threat to the implementation of the project.	<p>All workers and MoES staff involved in the field operations shall be oriented on security threats and guidance provided in the project Security Management Plan.</p> <ul style="list-style-type: none"> -A Project level Security Risk Assessment and SMP shall be prepared by a certified security risk management firm hired by MoES and will outline requirements for all personnel engaged in the project -Once the districts and project implementation areas have been confirmed, a district Security Risk Assessment shall be conducted and a district specific SMP prepared and applied. -Contractors will be required to prepare site specific plans as part of their ESMPs using templates provided by the project security advisor.

Risk	Analysis	Mitigation
Occupational health and safety	The project activities during implementation, which include the renovation of University campuses, possibly women development centers WDC other amenities, installation of ICT equipment may be associated with OHS risks including physical hazards, such as slip and falls from heights associated with working on ladders, elevated noise, electrocution of the workers/staff, and exposure to air pollution hazards, including elevated dust levels and exposure to COVID-19 and other contagious diseases, as well as potential exposure to asbestos-containing materials, if there are any old structures to be removed.	<p>The measures listed are representative but not necessarily complete, and a final complete set of all OHS management measures (avoidance, mitigation, monitoring, training, capacity, etc.) needed for project related school (University campuses/WDC) renovation. These will be established in the standard (base) ESMP for school renovation to be developed at the initiation of the project. Based on the WBG's EHS General Guidelines (EHSGs), the standard ESMP will then be modified/enhanced based upon the subproject screening (and any other additional activity) and be used as a requirement for contractors (including a base for their C-ESMP).</p> <ul style="list-style-type: none"> -The contractors shall provide the workers with the required PPE and always enforce use while at the worksite. -The contractors should keep emergency and first aid tool kit in the sites, which will be replenished once used -The equipment used in the works should be routinely serviced to ensure proper and safe functionality -Carry out job risk assessment (analysis of hazards likely to exist and precautions required) before executing the assignment, and at different intervals as may be practically possible to ensure safety assurance -Use of safety signage "MEN/WOMEN AT WORK"/Slippery floor/ Object Falling to warn the project staff and other workers on site -Provision of adequate signage and communication in local language of risks to workers and community members -Hazardous areas should be clearly marked with signs easily understood by workers, visitors and the general public, as appropriate -Contractor workers should be trained in the use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyard -Electrical works should be performed by trained and qualified experts -Ensure that electrical equipment is properly connected before switching on sockets -Use only the standard electrical connectors when joining extension leads or cables -In case of any spillage at work areas, the contractor should clean the spillage immediately, anti-slip hazard warning signs should be used when mopping floors to reduce chances of slip falls

Risk	Analysis	Mitigation
		<p>-Installation of different type of fire extinguishers</p> <p>-Training of staff and the relevant team members on the use of the fire extinguishers</p> <p>There will be an elaborate health and safety requirement which will address the OHS risks in every subproject, including hazard analysis, health and safety plans among others, details of which is found in Annex 2.</p>
Operational Phase (Component 2)		
Insecurity	The main security threats associated with the project include attacks on workers (direct, contract, community and suppliers) and theft of project materials and equipment. Further, banditry within some regions may pose a threat to the implementation of the project.	<p>All workers, learners, and MoES staff involved in the field operations shall be oriented on security threats and guidance provided in the project Security Management Plan.</p> <p>-A Project level Security Risk Assessment and SMP shall be prepared by a certified security risk management firm hired by MoES and will outline requirements for all personnel engaged in the project</p> <p>-Once the districts and project implementation areas have been confirmed, a district Security Risk Assessment shall be conducted and a district specific SMP prepared and applied.</p> <p>-Contractors will be required to prepare site specific plans as part of their ESMPs using templates provided by the project security advisor.</p>
Traffic related hazards	There is high risk associated with traffic and road safety hazards during the operation phase in relation to the collection, supply and delivery of materials and equipment for the project.	<p>Use of competent drivers with defensive driving techniques</p> <p>-MoES and responsible FMS staff shall regularly inspect vehicle safety and maintenance - the details of all vehicles being used for the project shall be recorded and details captured.</p> <p>-Only road worthy vehicles and trucks shall be used in transportation of project equipment and materials to avoid frequent breakdowns and risks of road accidents. This will be done by the Head Driver and contractors in conjunction with PIU's Environment Specialist</p> <p>-All drivers and loaders shall sign the CoC and provide security clearance or a surety from the local community leaders</p>
GBV/ SEAH	The risk of GBV and sexual harassment is very high during renovation. The workers could be subjected to such risks especially the vulnerable members of the society.	<p>The mitigation measures will include:</p> <ul style="list-style-type: none"> • Sensitize project workers and the MoES staff and beneficiary communities on GBV/SEAH • Sensitize communities and students on GBV/SEAH and the referral pathways • All project personnel to be sensitized on GBV/SEAH as well as the beneficiary communities • The CoC, to be signed by the

Risk	Analysis	Mitigation
Fire risk	Without provisions for fire safety, there is a risk of fire outbreaks at schools and MoES facilities during operation especially due to a faulty or old electrical connections malfunctioning, appliance or from ignitable materials, cigarette smoking.	workers and enforced by the site manager. For each school and for each of the center of higher learning supported by the project, there shall be a risk assessment, which shall evaluate and characterize all relevant risks, including fire and other manmade or natural events/disasters. The project will ensure that the appropriate mitigation measures be included in the ERP and resources provided. MoES shall provide fire suppression facilities including fire extinguishers/fire blankets to the schools and offices supported by the project and ensure the firefighting equipment is serviced as required. -Key staff at the MoES offices and schools shall be trained on basic skills in fire control. -MoES and schools shall prepare site specific emergency response plans (Section I Emergency Response Plan template) of Annex 2 -Undertake regular fire and security drills at offices and schools to test emergency response and use the results to improve on the response mechanisms.
Component 3		
Discrimination of employment based on gender, disability or ethnicity	The risk of discriminating based on gender, disability and ethnicity/clannism in recruitment exists especially at the local level during the renovation of schools (Uni. Campuses) and offices. There is also a risk of bias in the recruitment of teachers, project staff and workers in supported schools, during operation.	The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. The CoC (see template in Annex 1), to be signed by all workers, is aimed at preventing and addressing harassment, intimidation and/or exploitation. -Contractors will be compelled to offer a written undertaking and commitment to safeguard the interests of women, including ensuring gender parity at the workspace, provide appropriate sanitation facilities at the workplace and appropriate PPE for women and persons with disability (in accordance with WBG's EHSs). -Employees and workers (through a separate Workers' GRM) will equally have unfettered access to the GM channel to raise their concern -The social specialists will routinely and periodically supervise and monitor the contractor's approach and actions to ensure that no cases of discrimination occur or if

Risk	Analysis	Mitigation
		they occur, they are addressed immediately through the appropriate channels.
Terms and conditions of employment and labour disputes	The contractor and primary suppliers will have workers who will be involved teaching and training in the renovation of training, schools and other amenities, and installation of ICT equipment. Potential labour disputes may arise due to interpretation, application and/or breach of collective bargaining agreement (CBA), individual contract regarding conditions of employment, variation or change of job descriptions (JD), fringe benefits, hours of work, and wages either negotiated or of already agreed terms. Labour disputes may also arise due to disagreements amongst the workers and between workers and the contractors, primary suppliers, and community workers. hours of work, and wages either negotiated or of already agreed terms.	<p>The project shall adhere to the requirements proposed in the project LMP including:</p> <ul style="list-style-type: none"> • Fair terms and conditions shall be applied to all project workers (guided by relevant laws) • The project shall have GMs for project workers (direct workers, contracted workers, primary suppliers and community workers) to promptly address their workplace grievances. The social specialist at the PIU will ensure the GM is functional accessible. • The project shall respect the workers' right to join labour unions and freedom of association <p>Project workers will be provided with information and documentation that is clear and understandable regarding their functions, terms and conditions of employment. The information and documentation will set out their rights under national labour and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of ESS2. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.</p> <p>-The documentation will be translated into Somali and read out to workers who may not be literate</p> <p>-The workers will be provided with accessible and safe means to raise workplace concerns. This will be done through the workers' GM under ESS2 and project grievance mechanism as well as formation and joining of collective bargaining bodies</p>
GBV/SEAH	The risk of GBV and sexual harassment will possibly be present due to the nature of interaction between teachers, project workers, consultants in data collection, management, and capacity building activities. The workers could be subjected to such risks especially the young women, adolescent girls and boys.	<p>The mitigation measures will include:</p> <ul style="list-style-type: none"> • Sensitize project workers, learners, and the MoES staff on GBV/SEAH • Sensitize communities and students on GBV/SEAH and the referral pathways • All project personnel to be sensitized on GBV/SEAH as well as the beneficiary communities • The CoC, to be signed by the workers and enforced by the site manager.

3.1. Responsibility for the LMP

72. The MoES will implement procedures contained in this LMP. The procedures outline the manner in which project workers will be managed, in accordance with the requirements of national laws, and ESS2. It is notable that although the provisions of the Somalia Labour Code 1972 are relevant to project activities it falls short in satisfying the requirements of the ESS2.

73. The PIU will address the project labour risks outlined in this LMP and those that emerge during implementation. This will be achieved through developing recruitment guidelines, procedures and appropriate OHS measures while applying relevant provisions of the Labour Code 1972 and the Civil Service Law (Law Number 11) and those in LMP and WBG EHS General Guidelines related to OHS. In addition, the PIU will train all workers engaged in project activities on the guidelines and protocols on security management and GBV/SEAH prevention and mitigation. Information will also be disseminated to workers on how to protect themselves and the communities from the spread of COVID-19 and any other infectious diseases that might emerge as well as grievance mechanisms (including a separate GM for project workers).

74. The renovation activities to be implemented by the project might cause an emergency which is an unanticipated incident, arising from both either natural and man-made risks, and this could be in the form of fire, explosions, leaks, or spills, which may occur for a variety of different reasons. There will be designed measures to address the emergency event in a coordinated and expeditious manner to avoid injury to workers. The EPR prepared as per the ESS4 will encompass the labour elements and appropriate prevention, preparedness, response on how the workers will respond to the emergency and understand their roles and responsibilities. Any emergency response will address the expected prevention, preparedness for two phases, implementation and operational phase.

4. KEY POLICIES AND PROCEDURES

75. This section outlines main policies and procedures to be followed during the implementation of the project and will be updated and amended as needed, after contracts have been awarded. In line with this LMP and national legislation for the Ministry of Labour, the contractor will prepare Labor Management Plan. The principles and procedures presented below represent minimum requirements but are not an exhaustive list of requirements.

4.1. Recruitment and Replacement Procedure

76. Objective: The objective of this procedure is to ensure that the recruitment process and placement of project workers (including direct and contracted workers) is conducted in a manner which is non-discriminatory, and employees are inducted to all essential work-related matters.

Procedure

77. The PIU or contractor to follow the recruitment plan presented to him/her by the PIU for incorporation in the employment contracts before any approval this will be equally applicable to employees recruited before the contractor signed the project contract. Such employees will have their contract reviewed to reflect these changes and such a review of terms will be an integral part of the project contract to the contractor. The following details will be included:

- Number of staff required.
- Intended working conditions;
- Intended locations of staff; and
- Job specifications in terms of qualifications and experience.

The Contractor, wherever appropriate and feasible, publishes the job invitation in the appropriate media (local press or direct invitation for contracted worker, or word of mouth through local leaders for community workers and public gathering areas like mosques) to ensure all potential candidates have access to the information, including women, while actively addressing risks of nepotism. The PIU will advise on the appropriate method to disseminate the advert as per the area and relevance. Shortlist and recruit candidates ensuring the following:

- As much as possible, 30% shortlisted candidates are women;
- As much as possible, 30% engaged employees are women;
- Ensure the representation of persons with disabilities; and
- Screen out candidates under the age of 18 years.

78. Upon recruitment, ensure a contract of employment is signed voluntarily, with all details captured, for both contracted workers and community workers.

79. For community workers, contractor will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent through the appendage of signatures against the resolutions or signing the attendance register of the meeting which made the employment resolutions.

80. Before commencement of work, the Social Specialist and the PIU will ensure the employee is inducted on the essential work-related issues. The CoC will be translated into Somali and read out to workers who may not be able to read and write. The social and environmental specialists will ensure that there is capacity building done for the contractors to comply with the LMP requirements

identified here. Maintain all such employment records available for review by the PIU, the WB, or Regulatory Authorities.

4.2. Occupational Health and Safety Procedures

81. Pursuant to the relevant provisions of the Labour Code, ESS2 (including WBG EHS General Guidelines), and WB standard procurement documents, the MoES will manage the project in such a way that project workers are properly protected against possible OHS risks. The contractors and primary suppliers will be provided technical support (through consultancy) to develop and follow policies and procedures and develop internal regulations in line with these provisions including preparation of project specific C-ESMP and operational ESMP necessary for addressing the social risks including OHS risks. Key elements of OHS measures include: (i) identification of potential hazards to workers; (ii) provision of preventive and protective measures; (iii) training of workers and maintenance of training records; (iv) documentation and reporting of occupational accidents and incidents; (v) emergency preparedness; and (vi) remedies for occupational injuries and fatalities.

82. The objective of this procedure is, therefore, to achieve and maintain a healthy and safe work environment for all project workers (contracted workers, primary suppliers and community workers) and the host community. The consultant recruited for this process will support the development of templates to ensure ESS2 provisions are included in these procedures and enhance the capacity of the contractors to implement the procedures outlined below.

Procedure

- i. On procurement for contractors, the PIU will avail the ESMF and a standard ESMP to the aspiring contractors so that contractors include the budgetary requirements for OHS and community health and safety measures and instruments in their respective bids.
- ii. The PIU, either through a consultant or through internal resources, will develop a safety management system and the contractor will maintain it. The system will be consistent with the scope of work, duration of contract and IFC General Environmental Health and Safety Guidelines (EHSGs) on OHS which can be found at <http://www.ifc.org/wps/wcm/connect/9aef2880488559a983acd36a6515bb18/2%2BOccupational%2BHealth%2Band%2BSafety.pdf>.
- iii. The contractor will adopt the project specific contractor C-ESMPs to help manage labour construction risks (technical support will be extended on need basis).
- iv. The contractor, with the support of the environmental specialist at the PIU, will provide appropriate training/induction of project workers and maintenance of training records on OHS.
- v. The contractor documents and reports on occupational accidents, diseases and incidents to the PIU and WB.

83. Contractors to comply with all requirements of applicable OHS legislation and environmental legislation including WB EHS General Guidelines, which will be included in the standard ESMP that will also incorporate OHS requirements. This will be simplified and translated into Somali language. The PIU will provide technical support to the contractors on a need basis.

Contractors shall maintain all such records for activities related to the safety health and environmental management including trainings undertaken, accidents (fatalities, loss time) and log of all reporting to the PIU on such incidents for inspection by the PIU and WB. The Contractor will also provide OHS related data/information in their routine reports to the PIU. The university shall equally maintain the same record as mentioned here and include OHS related data/ information in their periodic reports. Post-renovation and into the maintenance phase of the project facilities, the PIU will:

- provide adequate resources (equipment, personnel, training) to prevent workplace and learning environment injuries and illnesses

- enhance OHS profile in the learning and working culture
- provide transparent and robust information, training, instruction and documentation
- drive continuous improvement in health, safety and wellbeing, and
- maintain a learning and working environment that is safe and without risks to health.

All classrooms have to meet the minimum health and safety requirements for managing OHS and EHS aspects. In practical terms, in the learning and working environments financed by the project, the following shall be undertaken:

- Slips, trips, and falls – for example, ensuring that corridors and walkways are clear, and uneven areas of floor are highlighted. This is particularly important because the majority of non-fatal accidents in workplaces are slips, trips, or falls. Non-fatal accidents can have severe consequences for WDCs and schools, including financial costs and sustained absences.
- Fire – for example, having fire-fighting equipment in place, and displaying the fire evacuation procedures clearly. Fire prevention measures are key to institution and school health and safety, because fire often has a devastating effect.
- Furniture and fixtures – for example, ensuring that cupboards, bookcases, display boards, and shelving are securely fastened and in good condition. This prevents them from falling or collapsing and causing serious injury.

4.3. Labour Influx Procedure

84. **Objective:** The objective of this procedure is to train the PIU, implementers and contractors on how to mitigate the labour influx risk and impacts. The influx of workers and followers can lead to adverse social and environmental impacts on local communities. Such adverse impacts may include increased demand and competition for local social and health services, as well as for goods and services, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, social conflicts within and between communities, increased risk of spread of communicable diseases, and increased rates of illicit behaviour and crime, including GBV cases and potential clan conflict.

Procedure

- i. Contractors shall ensure that all non-technical work is reserved for local communities (identifiable with the host community and witnessed by host community leadership).
- ii. Beneficiary selection and employment recruitment should verify the authenticity of the localness of potential employees.
- iii. The contractor liaises with local leadership on enrolment of community workers while at the same time ensuring that no grievances derive from nepotism through utmost transparency in the selection process, announcing hiring processes early enough in community consultations and/or other outreach activities.
- iv. Where there are camp establishments, contractor shall ensure camp management and community relations are good. If labour camps are required, special management plans need to be developed, or for smaller establishments, camp management should be reflected in the ESMP.
- v. Security within camp.
- vi. Social relations with community members should be cordial and consistent with the provisions in the GBV/SEA Action Plan.
- vii. Waste management.

- viii. Water and sanitation
- ix. Proper camp demobilization.
- x. Ensure adherence of workers to the CoC provisions on interactions with the host community. This may include:
 - Access to camp by children, non-employed girls and women.
 - Appropriate language;
 - Time restrictions where required; and
 - GBV/SEA prevention.
- xi. Good conduct, if small numbers of workers are accommodated in communities rather than camps (requirements on when to establish a camp shall be included in the POM).
- xii. Contractor shall ensure that access to local supplies shall not negatively impact the availability of resources for the local communities and sourcing of local wildlife shall be prohibited.
- xiii. Contractor shall provide a fully equipped first aid kit.
- xiv. Contractors to mainstream HIV/AIDS and COVID-19 issues in the workplace by providing prevention training during induction and continuously during employment through health and safety talks.
- xv. Contractor to be fully aware of and be ready to receive, log and resolve complaints and provide information about project GM including GBV/SEA complaints. Contractors should have a system for managing workers' complaints and report to MoES on a monthly basis. GBV/SEA cases involving project workers will be reported to the PIU within 24 hours and the WB within 5 days.

4.4. Management of GBV/SEA

85. A GBV Prevention and Protection Action Plan will be developed for this project, and will ensure GBV/SEAH prevention measures are in place for the project and will complement the project GM. The Plan presents operational activities as well as recommendations for GBV/SEAH risk mitigation that build on existing mechanisms in the MoES, at the Federal Government and Federal Member States, noting that the capacity at the various levels remains low. The Plan will be based on existing protection, prevention and mitigation strategies and measures developed and coordinated through the MoES and its partners at the implementation level. The implementation of the Plan will be supported by a service provider for on-call psychosocial services which will include a hotline for reporting cases of GBV/SEAH and child abuse. Requirements for safe and confidential reporting of cases of GBV and child abuse will be inbuilt into the service provider's terms of reference (ToR).

86. To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GM will have a survivor-centric approach to GBV-related cases, which will be dealt with according to the complainant's informed consent. Where such a case is reported, the complainant will be provided with information about the available services including referral to the GBV Service Provider; confidential appropriate medical and psychological support; emergency accommodation; and any other necessary services as appropriate including legal assistance. Staff contacted by a survivor will immediately inform the GBV Service Provider or refer him/her to a health facility that specializes in free post-GBV health support (within 72 hours of the incident). All staff and GM focal points will be informed that if a case of GBV is reported to them, the only information they will establish is if the incident involves a worker on the project, the nature of the incident, the age and sex of the complainant and if the survivor/complainant was referred to service provision. All project workers will be asked to sign a CoC which includes provisions related to

managing GBV/SEA/SH risks. If a worker on the project is involved, the incident will be immediately reported to the Project Manager who will provide further guidance after consulting with the WB.

87. To build relevant capacities within the FGS and FMS to manage risks associated with GBV, the project will ensure sensitization is undertaken periodically to highlight the potential risks and possible mitigation measures. The Project will equally employ a GBV specialist who will be responsible for training the project workers on different issues including protection of victims, secure channels among others and ensure GBV Prevention and Response action Plan is integrated in the, management of project risks and follow up on the reporting channels and

4.5. Age of Employment

88. This project shall not engage any worker less than 18 years of age. The social safeguard shall ensure those 18 but young do not engage in dangerous work and the work does not interfere with their school program if in school. The PIU will ensure that the contractors and primary suppliers adhere to the age requirement. Any contractor in contravention of this shall be answerable to the project coordinator in the PIU who will establish the nature and veracity of such action and take action according to the laid down procedures including immediately remedying the situation.

89. The process of age verification: verification of the age of employees shall be undertaken prior to the engagement and of labour and be documented. For vulnerable and marginalized groups (VMGs) who may not have identification papers, verification by a recognized reliable local leader will suffice to engage them. The PIU will require all contractors and primary suppliers to adhere to this requirement. The PIU will conduct supervisory visits during which it will confirm, among other things, adherence to this requirement.

4.6. Forced Labour

90. The project shall not allow use of forced labour in its operations. Contractors are supposed to develop robust mechanism to ensure all the labour force present at their sight is voluntary and non-coerced. This procedure provides mechanism to ensure that no one is forced to undertake any work without prior and free consent.

Procedure

- i. Before submitting a bid for any contract, the contractor shall incorporate the requirements as provided in this LMP on forced labour and other related issues;
- ii. The PIU will inform potential contractor and supplier on the policy of forced labour;
- iii. The contractors to undertake not to include within the work force anyone under forced labour
- iv. The contractor to all the social safeguard to inspect records of employees contracts
- v. All contracts must be in language understood by the employee.
- vi. The contractor will forced to stop operation until any reported case related to forced labour is remedied
- vii. The PIU will hold payments until any recurring case is sorted and the terms of bidding will take effect.

4.7. Contractor Management Procedures

91. Each contractor engaged by the project to provide services will be expected to adopt the measures outlined in this LMP. The contracts drawn by the Government will include provisions, measures, and procedures to be put in place by the contractors to abide by the relevant labour and OHS requirement and remedy any defective concerns. Measures required of contractors as part of the bidding/tendering process, specific requirements for certain types of contractors, and specific

selection criteria. The objective of this procedure is to ensure that the PIU has contractual power to administer oversight and take action against contractor noncompliance with the LMP.

Procedure

- i. The PIU shall avail all related documentation to inform the contractors about their requirements for effective implementation of the LMP.
- ii. The PIU, including the environmental and social specialist, are to ensure all relevant OHS requirements (clauses) are included in bid package.
- iii. Before submitting a bid for any contract, the contractor shall incorporate the requirements as provided for in the ESMF and this LMP.
- iv. Contractors to formulate and implement contractor specific Environmental and Social Management Plans (C-ESMPs) as required by the ESMF and specifically the LMP.
- v. Contractor to submit compliance status reports on the implementation of the LMP.
- vi. The social and environmental specialists to periodically review, monitor and prepare progress reports on the soundness of the implementation steps put in place by the contractor. The PIU will have unfettered access to independently verify the soundness of the contractor's implementation of the requirements of the LMP.
- vii. Where appropriate, the PIU may withhold contractor's payment until corrective action(s) is/are implemented on major noncompliance to the LMP
- viii. Contractors will be required to establish GM structures for the workplace. These will include identifying focal points and communication channels (for example, WhatsApp, SMS and email) within the company to address workers' concerns on an ongoing basis and ensuring that such channels are safe and adequately resourced. Workers shall not be victimized in any way for reporting a grievance as described in Section 5.
- ix. Modalities will be put in place, by the social specialists, to guide the relationship between the contractors, and the community. Information flow modalities will also be worked out.

4.8. Community Workers

92. Some activities will include the use of community workers in a number of circumstances like renovation activities under component 2. In these cases, the related OHS risks are perceived as low since they will be using simple tools and performing light work. Given the nature and objectives of such a Project, the application of all requirements under ESS2 may not always be applicable. In all such circumstances, this procedure provides measures to be implemented to ascertain whether such labour is or will be provided on a voluntary basis as an outcome of individual or community agreement and if the employment terms and conditions have been fully discussed and agreed. The objective of this procedure is to ensure the community workers offer their labour voluntarily and are agreeable to the terms and conditions of employment.

Procedure

- i. The PIU and all contractors/implementers using community workers will apply the following guidelines when dealing with community workers. The PIU will develop standard ToRs, working times, remuneration systems (depending on the type of work), methods of payment, timing of payment, and community workers' CoC, which will apply to all project activities. These will be developed during the Project inception phase.
- ii. Produce a recruitment plan and have it reviewed and approved by the PIU.
- iii. Meet and document resolution of meetings with communities on the intended community workers' recruitment. The resolution shall include details on:
 - Nature of work;

- Working times;
 - Age restrictions (18 and above), including intended age verification means;
 - Diversity of the workers;
 - Remuneration amount;
 - Method of payment;
 - Timing of payment;
 - Individual signatory or representative signatory of meeting resolution; and
 - Community general undertaking and acknowledgment.
- iv. Induct community workers on key LMP issues, including:
- GBV and SEAH;
 - Workers' and Project GM;
 - OHS;
 - HIV/AIDS and COVID-19 awareness;
 - Safe use of equipment and lifting techniques; and
 - Applicable PPE

4.9. Primary Supply Workers

93. Primary supply workers are employees of suppliers who on an ongoing basis, provide goods and services to the project. Although suppliers may be sub-contracted by other implementers, the PIU has oversight on the implementation of the LMP requirements for this category. The objective of the procedure is to ensure that labour related risks to the project from primary supply workers are managed in line with the requirements of ESS2.

Procedure

94. The PIU and all contractors/implementers will undertake the following measures:
- i. Procure supplies from legally and local constituted suppliers. A legal registration ensures that the company is legally obligated to comply with all applicable labour laws, which makes it possible to assume mainstreaming of the labour laws within the supplier's firm.
 - ii. Identify potential risks of serious safety issues which may arise in relation to primary suppliers.
 - iii. If there is a significant risk of serious safety issues related to primary supply workers, the PIU and all contractors/implementers will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.
 - iv. Check products quality certification and environmental rating of the materials used where required. This will be done, when necessary, by conforming the quality approval form the relevant authority.
 - v. Undertaking to take back waste for reuse, for example containers and packaging, where applicable.
 - vi. Possibility for training in safe use of product by community users where applicable.
 - vii. The PIU will assess any potential child and forced labour risks within the operations of a primary supplier.
 - viii. The supplier will undertake not to use any goods and services from suppliers using child and

or forced labour.

- ix. The primary supplier to present periodic report on the age and contract of employees, and the social specialist will monitor the supplier to ensure compliance.

4.10. security of project workers hiring of security personnel.

95. Project workers need to be protected against all form of violence. In a FCV context where multiple groups have effective control of certain areas and cause a lot of insecurity, the contractor has a responsibility to ensure the project workers are not subjected to threat at the project site. The PIU will require clear security guidelines from the contractor to ensure project workers are not at risk.

Procedure:

- 96. The PIU and the contractor shall ensure that:
 - i. The contractor follows the site-specific security protocols.
 - ii. The security personnel is well vetted and has no risk profile as per the security plan and protocols;
 - iii. the contractor shall maintain the relevant level and number of security personnel as per the advice of the site security protocol.
 - iv. All workers have been briefed and continuously informed on the security protocols.
 - v. The contractor shall have details of all the workers at the site and have their identity cards and referee's details.
 - vi. Access to the project shall be limited to only people with relevant security clearance.
 - vii. Workers will be subjected to security check every morning.
 - viii. The contractor undertakes continuous evaluation of security risk and share with the security specialist at the PIU.

5. GRIEVANCE MECHANISM

5.1. General Principles

97. Typical workplace grievances include demand for employment opportunities, labour wage rates, delays of payment, disagreement over working conditions, and health and safety concerns in the work environment. A grievance structure will be established for project workers (direct workers and contracted/supply workers), as required in the LMP. Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. The GM will also allow anonymous complaints to be raised and addressed. Individuals who submit their complaints or grievances may request that their names be kept confidential, and this should be respected.

5.2. Civil Servants

98. For civil servants, the government established mechanisms of resolving conflict at the workplace will be utilized. However, when an aggrieved direct worker wishes to escalate his/her issues or raise concerns anonymously and/or to a person other than his/her immediate supervisor/hiring unit, the worker may raise the issues with the PIU Manager or use the Project GM. The process for civil servants will entail:

- i. In case of a violation, the aggrieved employee will capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
- ii. The supervisor will verify the details and seek to address the matter within the shortest time, up to 48 hours.
- iii. A channel to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline that might also be anonymous;
- iv. Stipulated timeframes to respond to grievances.
- v. A register to record and track the timely resolution of grievances.
- vi. A responsible section/wing/committee to receive record and track resolution of grievances.
- vii. The supervisor will escalate the matter if not resolved within 48 hours until a resolution is found or not found.
- viii. Where no resolution is found, the employee can escalate the matter to the sector specific institutions, to the project GM or courts who will resolve the matter between employer and employee. The Supreme Court's decision is final.

5.3. Contractors and Primary Workers

99. The following actions will be used to manage complaints for this project among contract workers. Where contractors have an existing grievance system, their direct workers should use such a mechanism, but this mechanism should be made known to the PIU as part of the documentation submitted on labour management. The requirement for a GM system at the workplace will be necessary for a contractor with 10 or more staff engaged in the project.

- i. The contractor will establish a GM committee at the workplace comprised of representatives of the different work streams (management, employees, casuals, etc.) and assign a GM focal point.
- ii. The contacts of the GM focal point will be shared with the staff on recruitment.

- iii. Contractors will induct the employee on the applicable workers' GM and on rights. All records of induction shall be kept and made available for inspection by the PIU and/or the WB.
- iv. Complaints should be sent to the GM focal point at the workplace by email, text, phone, and letter or in person. The complaints should be collated into a complaints form and logged into the register.
- v. The GM Committee will review the complaint and provide guidance on the course of action and ensure follow-up on previous complaints. Any complaint by workers should be responded to in 7 working days upon receipt. If the complainant is dissatisfied, he/she can refer to the Project GM or contact the WB Task Team.
- vi. Complaints related to insecurity will be treated in confidence and in case of serious outcomes (including death and serious injuries), the case will be reported to PIU and the World Bank team within 24 hours.
- vii. For complaints raised through alternative means, i.e., those raised through social media, print media or not formally lodged, the committee should deliberate upon them to decide whether to investigate based on the substance and potential impact including reputational risk.
- viii. No disciplinary or legal action or retaliation of any kind will be taken against any worker raising a complaint in good faith.
- ix. In case of risk of retribution, the employee may immediately escalate to the court system or to the PIU. If confidentiality is requested, the PIU will ensure this is done in order to avoid any risk of retribution, including in its follow-up actions.
- x. A monthly report of complaints and the resolution status should be submitted to the PIU and the WB.
- xi. Community Workers: The workers under this category will have multiple reporting channels including GR developed by the contractor if working under one, also, there will be Social Accountability Committee which will be able to listen and report on all issues affecting the community in general, in addition to the Project GM. The community workers will be free to raise their concerns with the SAC in a free and accessible manner.
- xii. GBV related cases will only capture if the incident involves a worker on the project, the nature of the incident, the age and sex of the complainant and if the survivor/complainant was referred to service provision.
- xiii. All project workers will be asked to sign a CoC which includes provisions related to managing GBV/SEA/SH risks. If a worker on the project is involved, the incident will be immediately reported to the Project Manager who will provide further guidance after consulting with the WB.

5.4. Project GM

100. The project will have several channels for complaints and grievances including email, phone calls, texts, and letter writing. Information on the project GM will be made available to workers at all levels, government offices and partner agency offices to ensure that all workers have adequate information on how to lodge a complaint and who to direct it to. Confidentiality and whistle blower protection will be assured when handling workers' grievances. It is however notable that it will be difficult to resolve an issue affecting an individual worker if the worker remains anonymous unless the complaint is of a generic nature.

5.5. National Appeal Process

101. The labour laws provide for the national appeals process that should be utilized by any aggrieved staff if he/she considers the process established by the employer and/or the project to be ineffective and/or unfair. Other measures such as arbitration and mediation could be used depending on the nature of the complaint and the willingness of the parties involved.

5.6. World Bank Grievance Redress Service (GRS)

102. Individuals who believe that they are adversely affected by a WB supported project may submit complaints to existing project-level GMs or the WB's Grievance Redress Service (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 complaints to the WB's independent Inspection Panel which determines whether harm occurred or could occur as a result of WB's non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond.

6. RESOURCES FOR THE IMPLEMENTATION OF THE LMP

6.1. Management

103. The successful implementation of the LMP for the Raja Kaaba depends on the commitment of the different line ministries and agencies involved in implementation including and the capacity within the institutions to apply or use the LMP effectively, and the appropriate and functional institutional arrangements, among others. This section describes the detailed roles and responsibilities of the key institutions involved in the implementation of the project components.

104. The overall implementation and coordination of the project will be led by the MoES, Somaliland in collaboration with all key line ministries in Republic of Somaliland involved in civil service matters. The MoES will implement procedures contained in this LMP. The procedures outline the manner in which project workers will be managed, in accordance with the requirements of national laws, and ESS2. It is notable that although the provisions of the Somalia Labour Code 1972 are relevant to project activities it falls short in satisfying the requirements of the ESS2. The project will set up a Project Steering Committee (PSC). The PSC, headed by the minister of MoES with representatives from the partner ministries and agencies, will provide strategic direction and guidance on high-level policy, risk management and monitoring. It will also facilitate effective relationships across the project. The PSC will meet annually. The minister will have the latitude to make changes in the membership of the PSC and/or its ToRs on need basis.

105. The Project will use the existing Somalia education project PIU to implement the project. The PSU will be responsible for technical oversight and support to the MoES, partner coordination, and financial and administrative management, program activity monitoring and reporting to the donor. The PIU will be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders. The PIU will address the project labour risks outlined in this LMP and those that emerge during implementation. This will be achieved through developing recruitment guidelines, procedures and appropriate OHS measures while applying relevant provisions of the Labour Code 1972 and the Civil Service Law (Law Number 11) and those in LMP and WBG EHS General Guidelines related to OHS. In addition, the PIU will train all workers engaged in project activities on the guidelines and protocols on security management and GBV/SEAH prevention and mitigation. Information will also be disseminated to workers on how to protect themselves and the communities from the spread of COVID-19 and any other infectious diseases that might emerge as well as grievance mechanisms (including a separate GM for project workers).. The costs for all these activities are budgeted under the Component 4 and may be adjusted on need basis. The PIU will engage consultants, as necessary, with expertise on social, environment and OHS issues, and will work closely with other government officers including the Labour Inspectorate, and Safety and Health Officers to ensure full implementation of the LMP. The PIU will be responsible for the following tasks:

- i. Undertake the overall implementation of this LMP.
- ii. Engage and manage consultants and contractors in accordance with this LMP and the applicable Procurement Documents.
- iii. Monitor project workers to ensure their activities are aligned to this LMP and the applicable Procurement Documents.
- iv. Monitor the potential risks of child labour, forced labour and serious safety issues at workplaces.
- v. Provide training to mitigate social risks to project workers.
- vi. Ensure that the GM for project workers is established by the contractors and implemented and that project workers are adequately informed about it.

- vii. Monitor the implementation of the Workers' CoC; and
- viii. Report to the WB on labour and OHS performance, key risks, and complaints.

106. The Social environmental Specialist in the PIU will be responsible for promoting the implementation of this LMP and OHS requirements within the project as per their respective ToRs. The Social Specialist will be responsible for the following:

- i. Supervise workers' adherence to the LMP.
- ii. Overseeing GBV cases reported to the project.
- iii. Maintain records of recruitment and employment of project workers (including consultants);
- iv. Provide induction and regular training to project workers on environmental, social and OHS issues including specific information on Covid-19.
- v. Support the development and implementation of the GM for workers (especially technical teams contracted to deliver on specific tasks), including ensuring that grievances received from the workers are resolved promptly, and report the status of grievances and resolutions regularly to the PSU and WB.
- vi. Ensure all workers understand and sign the CoC prior to the commencement of project activities and supervise compliance with the CoC; and
- vii. Report to the PSU on labour and OHS performance of the project.

6.2. Resources for Implementing the LMP

107. The project should set aside funds to ensure that the planned LMP activities are implemented and monitored effectively. The summary budget is presented in the table 7 below: The PIP and other contractors will be helpful in implementing partners in different project components ensuring the principles of this LMP are well entrenched within the working environment. In undertaking these role, the PIP and contractors will:

- i. Ensure that they have effective non-discrimination policy in their employment capacity.
- ii. Develop enforcement mechanism within their structures to address discrimination.
- iii. Ensure their contract reflect the principles of this LMP.
- iv. Enforce the code of conduct internally to avoid negative impact.
- v. Formulate internal disciplinary mechanism of their staff and workers.
- vi. Support in disseminating GM among their workers and trainees.
- vii. Sensitize the workers and staff on GBV issues and the safe reporting channels available.
- ix. Ensure that all guidance given by the PIU is adhered to.

6.3. Training and capacity building

108. The capacity of the PIU remains nascent and requires support in terms of training and continuous capacity building to be able to implement and enforce this LMP within the project area. The team will require training related to LMP implementation: forced labour, child labour, GM, OHS, contractor management and supervision skills.

6.4. Emergency Response

109. The renovation activities to be implemented by the project might cause an emergency which

is an unanticipated incident, arising from both either natural and man-made risks, and this could be in the form of fire, explosions, leaks, or spills, which may occur for a variety of different reasons. There will be designed measures to address the emergency event in a coordinated and expeditious manner to avoid injury to workers. The EPR prepared as per the ESS4 will encompass the labour elements and appropriate prevention, preparedness, response on how the workers will respond to the emergency and understand their roles and responsibilities. Any emergency response will address the expected prevention, preparedness for two phases: implementation, and operational phase.

Table 6: Estimated budget for implementing the LMP

Labour Management Activities	Quantity	Unit Cost, USD	Total cost (USD)
Support the development of OHS management plans and Covid-19 protocols at the workplace (1st 6 months)	2	2,000	4,000
Travel expenses of staff on LMP activities (supervision missions by the safeguards officers and PSU leadership)	6	2,000	12,000
Establishment and operationalization of GM	1	20,000	20,000
Training (contract management, CoC, GM , GBV, etc.) for PSU, civil servants and contractors (1st 6 months)	2	10,000	20,000
Evaluation and documentation of the project results (at the end of the funding period)	1	10,000	10,000
Preparation of ERPs – consultations	5	2,000	10,000
Sub-total			76,000
Contingency – 5%			3,800
Total			79,800

*The costs will be updated in coordination with the MoES and PIU.

ANNEXES

ANNEX 1: INDIVIDUAL CODE OF CONDUCT FOR PROJECT WORKERS

I, _____ acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) is important. All forms of GBV/SEA/SH are unacceptable in the workplace or when interacting with people including users of services provided by the project.

The organization considers that failure to follow ESHS and OHS standards, or to be involved in GBV/SEA, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV/SEA/SH may be pursued if appropriate.

I agree that while working on the project I will:

- a. Attend and actively be involved in training courses related to ESHS, OHS, HIV/AIDS, GBV/SEA and Covid-19 as requested by my employer;
- b. Follow my employer's guidance on prevention of spread of infectious diseases including Covid-19;
- c. Follow my employer's guidance on security and safety;
- d. Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status;
- e. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- f. Not participate in sexual contact or activity with children – including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse;
- g. Not engage in sexual harassment - for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour. For instance, looking somebody up and down, kissing, howling or smacking sounds, hanging around somebody, whistling and catcalls, giving personal gifts, making comments about somebody's sex life, etc.;
- h. Not engage in sexual favours – for instance, making promises or favourable treatment dependent on sexual acts – or other forms of humiliating, degrading or exploitative behaviour;
- i. Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex - such sexual activity is considered “non-consensual” within the scope of this Code; and
- j. Report through the Reporting Mechanism or to my manager any suspected or actual GBV/SEA by a fellow worker, whether employed by my organization or not, or any breaches of this Code of Conduct.

Use of children's images for work related purposes

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

- i. Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.

- ii. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- iii. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- iv. Ensure images are honest representations of the context and the facts.
- v. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

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

- i. Informal warning;
- ii. Formal warning;
- iii. Additional training;
- iv. Loss of up to one week's salary;
- v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
- vi. Termination of employment; and
- vii. Report to the police if warranted.

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

Signature: _____ Name _____
Title: _____ Date: _____

ANNEX 2: OHS REQUIREMENTS FOR PROJECT WORKERS

The MoES endeavours, in all its projects and operations, to prevent personal injuries, ill health and damage to property. To guarantee this, MoES shall implement the Pre-Qualification Checklist for all contractors to ensure that the contractors have OHS management systems and program; project specific OHS plan; safety training provided to management and workers; competency, availability and qualifications of safety managers and staff; and OHS inspection processes to be implemented. Also, there will be a standard ESMP which will inform the contractor specific (C-ESMP) and school operation ESMP, the two ESMP will be project specific and draw from the standard ESMP the content of which will also capture the OHS as mentioned in this LMP and other relevant instruments.

This Project Occupational Health and Safety Requirements (hereafter referred to as Plan) have been designed to assist the management of activities and support a risk-based approach to preventing dangerous acts that could lead to injuries or illnesses or serious incidents (including Covid-19 infections) at MoES workplace as well as supply of goods and services. The plan will ensure that workers and suppliers will exhibit professionalism in performing their duties effectively and efficiently. The purpose of this plan is to establish a uniform and comprehensive process for prompt investigation and reporting of incidents, property damage, near misses, and significant Environmental, Health and Safety incidents including the spread of Covid-19 infections. This plan is intended to provide the minimum OHS requirements that all service providers/contractors and sub-contractors shall be required to adhere to. It shall be appended to the contracts. This Plan is a live document that will be reviewed on need basis and updated as necessary.

National laws, Regulations and other Compliance Requirements

Project implementation will adhere to the relevant Health and Safety legislation requirements in Somalia. This should also include the relevant requirements of interested parties that have been identified in the LMP. A check for legal compliance shall be undertaken to ensure that this project is compliant with the legal and other requirements including WB ESF, WBG General EHS Guidelines, GIIPs for operational phase OHS management and Covid-19 prevention guidelines.

General Requirements

Personal Protective Equipment (PPE) includes all equipment or apparel designed to provide workers with a barrier against workplace hazards and exposure. The equipment should protect the head, eyes, face, body, and feet. PPE protects workers/suppliers from the effects of exposure to chemical, physical, and safety hazards. Project workers who are exposed to work related physical and safety hazards that could cause injury or illness are required to wear PPE. All the necessary PPE shall be provided by contractor or entity responsible for WDC/school operations and training be provided on their proper use. Determining the existence of these hazards is a process referred to as "hazard assessment". This process is the critical evaluation of a work site to document the existence of a hazard, the severity of the workplace, and the specific PPE that will be used to protect employees from that hazard. Each hazard assessment must be included in the site-specific health and safety plan.

MoES will establish safety requirements and improve operational procedures through the use of this document. Preventing workplace injuries is the principal purpose of job hazard analysis. This document will provide a basis for studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), determining PPE requirements and establishing the best way to perform the job to reduce or eliminate these hazards.

RESPONSIBILITY: The Project Manager and Social Specialists are responsible for all facets of this OHS requirements and have authority to make necessary decisions to ensure success of the project. The Project Manager will be authorized to amend these instructions on OHS requirements in consultation with the PCU. In addition, each contractor and WDC entity operating shall also designate a OHS responsible person.

Incident Reporting

Provides the minimum requirements for investigation, reporting and recording of incidents which result in injury or illness to a person, or damage to any property, in order to insure compliance with national regulations, the project's Environmental and Social Commitment Plan (ESCP) and the WBG General EHS guidelines; contract provisions, insurance policy requirements and to prevent recurrence. All incidents (fatal or serious injury) shall be investigated and reported within 24-48 hours to the Ministry of Education and World Bank and recorded pursuant to the requirements of this section. The potential ESH incidents include, but are not limited to:

- OHS related incidents like slips, falls from heights;
- Fire emergency;
- Road accidents project affecting project workers;
- Motor vehicle accidents;
- Struck by moving object;
- Struck against stationary objects;
- Overexertion;
- Workplace violence;
- Repetitive motion injuries;
- Electrocution;
- Entanglement;
- Security risks such as banditry.

Incident Investigation

An investigation should be initiated immediately following any incident. The scene of the incident must be immediately secured so as to not damage or destroy evidence that may be necessary during the investigation. In general, the following information should be gathered and provided in written format using prepared Incident Report Form.

Determine the Root Cause

- i. Conduct root-cause analysis of the incident and identify the sequence of events and factual circumstances. The analysis should identify what failing(s) led to the accident, what safety measures were in place, and the risk information/training provided to workers on site.
- ii. Recommend actions to be taken to rectify the failure(s) that led to the incident.
- iii. Review the safety procedures and identify the health and safety measures to be taken to minimize the risks of future accidents both to workers and to local residents. Relevant site visits should be carried out to support the analysis. Health and safety representatives of the of the Ministry and implementing partners, as well as other technical counterparts, as necessary, should be interviewed to gain a comprehensive understanding about health and safety management.
- iv. Review the OHS measures in safeguards instruments and plans and recommend enhancements as needed. The assessment should identify the existing procedures for safe

- performance of project activities and should recommend appropriate procedures should the existing ones have gaps.
- v. Review the capacity of contractors/consultants to implement OHS standards. The assessment should review the training plans for effectiveness and propose improvements to the training and communication program so that workers are adequately guided to safely perform their work.
 - vi. Review the existing arrangements for recruiting labour and what type of insurance (life or injuries and occupational health risks) and compensations are provided.
 - vii. Review compliance to the Labour Law and other international treaties by implementing partners and contractors as necessary.
 - viii. Assess the sufficiency of the measures taken to minimize risk on the public and communicate with them. Recommend improvements as necessary.

Determining Corrective Actions

Once the real root cause and all contributory factors are identified, the next step is to use the Hierarchy of Health and Safety Controls to identify appropriate corrective action. The single most important outcome that results from an incident is the implementation of an effective, high-level safety control that eliminates the possibility of the incident recurring. Develop a response framework and discuss with the Bank, including actions, responsibilities and timelines for implementation, and a Borrower monitoring program. All project workers shall be required to fully abide by the CoC in compliance with the project LMP.

Job Safety Analysis

Job Safety Analysis (JSA) is a procedure that helps integrate accepted safety and health practices into a particular task or job operation. In JSA, the ultimate goal is to identify potential hazards in every step of a process and recommend the safest way to execute the job. JSA is a written procedure developed to understand, review, minimize or eliminate hazards associated with work processes. A Job Safety Analysis (JSA) must be conducted at the job site before the commencement of a job, or when there has been any modification done to the existing job process. JSA can also include risk assessment to evaluate the hazard occurrence probability while also detailing the severity of its consequences, and the effectiveness of the control and preventive measures implemented. Once the tasks and general hazards have been identified, the identified hazards will need to be controlled and/or reduced as appropriate. The following procedures are examples of control mechanisms for the hazards identified.

- Accident frequency and severity: The frequency - or severity - of past injuries can suggest to the PIUs and the contractors on where to begin the JSAs.
- Newly established tasks: Tasks that are new may present more risk because the project workers are not yet accustomed to these tasks.
- Potential for severe injuries or illnesses: Jobs that involve hazardous materials or dangerous conditions may have greater potential for accidents.
- Infrequently performed jobs: Like new tasks, jobs that are performed infrequently may present greater risk because project workers or PIU staff members don't know which hazards to anticipate.
- Determine hazards and risk present in each task.
- Identify preventative controls and residual risk. This includes documenting any personal protective equipment (PPE) that can help mitigate the hazards the PIU has identified.

Protection against possible Covid-19 related risks will be managed through:

- i. Arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of materials and equipment;
- ii. Ensuring that workers or suppliers participate in the application of Infection Prevention and Control (IPC) safety and health measures/guidelines as advised by MoH including availability of hand wash facilities, water and soap, alcohol-based hand sanitizer;
- iii. Train all staff on the signs and symptoms of Covid-19, how it spreads, how to protect themselves (respiratory hygiene, cough etiquette and hand hygiene) and the need to be tested if they have symptoms;
- iv. Provision of such information, instructions, training and supervision as is necessary to ensure the safety and health at work of workers and suppliers;
- v. All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs;
- vi. Any worker showing symptoms of respiratory illness (fever, cold or cough) and has potentially been exposed to Covid-19 should be immediately removed from work and tested for the virus at the nearest health facility;
- vii. Project management must identify the closest health facility that has testing facilities in place, to refer workers/staff;
- viii. Persons under investigation for Covid-19 should not return to work at the project site until cleared by test results. During this time, they should continue to be paid daily wages;
- ix. If project workers live at home, any worker with a family member who has a confirmed or suspected case of Covid-19 should be quarantined from the project site for 14 days, and continued to be paid daily wages, even if they have no symptoms;
- x. Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing;
- xi. Mandatory provision and use of appropriate PPE shall be required for all project personnel including workers and visitors;
- xii. Avoid concentration of more than 15 workers at one location. Where more than two people are gathered, maintain social distancing of at least 2 meters;
- xiii. Restriction of the number of people accessing the work areas;
- xiv. Fumigation of offices, work areas and project delivery vehicles; and
- xv. Train cleaning staff in effective use of PPE, cleaning arrangements and procedures and disposal of waste generated from the project activities.

The project will also adhere to any other MoES, Somaliland guidelines on Covid-19 as well as World Bank/WHO guidelines on Covid-19.

World Bank Incident Classification Guide

Indicative
<ul style="list-style-type: none"> • Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people • Does not result in significant or irreparable harm • Failure to implement agreed E&S measures with limited immediate impacts
Serious
<ul style="list-style-type: none"> • An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources • Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents • Failure to remedy Indicative non-compliance that may potentially cause significant impacts • Is complex and/or costly to reverse • May result in some level of lasting damage or injury • Requires an urgent response • Could pose a significant reputational risk for the Bank.
Severe
<ul style="list-style-type: none"> • Any fatality • Incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources • Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed • Failure to remedy Serious non-compliance that may potentially cause severe impacts Is complex and/or costly to reverse • May result in high levels of lasting damage or injury • Requires an urgent and immediate response • Poses a significant reputational risk to the Bank.

ANNEX 3: COMPLAINTS REPORTING TEMPLATE

Complainant ID No. _____

Date: _____

No. of complaints received	Main mode complaint lodged	No. of complaints resolved	No. of complaints pending	Duration taken to resolve, e.g., spot resolution, 1 day, 7 days, 14 days, 1 month, quarterly, annual	Recommendations for system improvement

ANNEX 4: WORKER COMPLAINT FORM⁶

No	Name (or anonymous, if preferred)	
	ID	
	Age	
	Tel	
	Email	
	Date Received	

Which institution or officer/person are you complaining about?

Ministry/department/agency/company/group/person

Have you reported this matter to any other public institution/ public official?

Yes

☐

No

☐

If yes, which one?

Has this matter been the subject of court proceedings?

Yes

☐

No

☐

Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of what happened, where it happened, when it happened and by whom]

What action would you like to be taken?

Complainant Signature _____

Date _____

Project Representative Signature _____

Date _____

Date Complaint Resolved: _____

NB: This disclosure remains confidential and shall not be disclose to any person without prior consent from the complainant or order from competent authority empowered to do so.

⁶ To be translated into Somali language

ANNEX 5: COMPLAINTS LOG

Date	Complaint Type	Officer/ department complained against	Nature of complaint/ service issue, e.g. delay	Type of cause – physical (e.g. system failure), human (e.g. inefficient officers, slow, unresponsive) or organization (e.g. policies, procedures, regulations)	Remedy granted	Corrective/ preventive action to be taken	Feedback given to complainant

ANNEX 6: RISK ASSESSMENT TOOL

The Hazard/ Risk	Risk Rating*	Potentially Affected persons/ Community members/ Environment	Mitigation Hierarchy Approach**	Actions/ Measures	Preventative Measures
Injury from Slips, Trips and falls					
Falling of moving parts of machine					
Electricals's equipment and faulty cables, damaged plugs, live parts,					
Fire because of flammable materials like paints and adhesives presence of sources of ignition like high temperatures					
Chemical substances from hazardous substances labelled as such					

** (i) anticipate and avoid risk, (ii) where avoidance isn't possible, minimize or reduce, (iii) once minimized/reduced mitigate, (iv) if significant residual impact remains, compensate for or offset, where technically and financially feasible. (ref: ESS1)

*Risk ranting based on likelihood and consequences

Likelihood	Consequences				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A. Almost certain	L	M	E	E	E
B. Likely	L	M	H	E	E
C. Moderate	L	M	H	E	E
D. Unlikely	L	L	M	H	E
E. Rare	L	L	M	H	H
<p><i>Legend</i> E: extreme risk; immediate action required H: high risk; senior management attention needed M: Moderate risk; management responsibility should be specified L: low risk; manage by routine procedures</p>					

Source: Environmental, Health, and Safety (EHS) Guidelines – IFC