



Sindh Social Protection Authority (SSPA)
Social Protection Department, Government of Sindh

Strengthening Social Protection Delivery System in Sindh (SSPDS)

MOTHER & CHILD SUPPORT PROGRAM

Labor Management Procedures (LMP)
June 2024



Executive Summary

The Labour Management Procedures (LMP) for the Strengthening Social Protection Delivery System in Sindh (SSPDS) project have been developed to ensure compliance with provincial, national labor laws and World Bank standards, particularly Environmental and Social Standard 2: Labour and Working Conditions (ESS2). This document outlines the approach to managing labor-related risks and issues associated with the project, which is supported by the World Bank and aims to reduce inequities for vulnerable groups by developing a robust social protection delivery system and expanding the Mother and Child Support Program (MCSP).

Project Overview

The SSPDS project will be implemented over five years (2023-2027). The project supports the operationalization of the Sindh Social Protection Authority (SSPA), the development of the Sindh Social Protection Delivery system, and the promotion of higher utilization of maternal and newborn child health services.

Purpose and Scope of the LMP

The LMP is designed to manage labor issues and risks associated with the SSPDS project, ensuring fair treatment, non-discrimination, and equal opportunity for all project workers. It covers provisions on working conditions, occupational health and safety, code of conduct, and the prevention of child and forced labor.

Overview of the LMP

The project will engage direct workers, contracted workers, primary supply workers, and community workers. Potential risks include working conditions, and gender-based violence. Mitigation measures include age verification for workers, awareness-raising activities, and strict adherence to provincial, national and international labor standards.

Pakistan's comprehensive labor laws cover terms and conditions of employment, prevention of child and forced labor, and occupational health and safety. Sindh Terms of Employment (Standing Orders) Act, 2015 governs the terms of employment and conditions of work in industrial and commercial establishments in Sindh. It includes provisions on employment contracts, termination, and employee rights. Sindh Shops and Establishments Act, 2016 regulates the conditions of work and employment in shops and commercial establishments. It includes provisions on working hours, holidays, wages, and working conditions. Sindh Minimum Wages Act, 2015 sets minimum wage standards for various sectors in Sindh and includes provisions for periodic reviews of wage rates. The project will adhere to these laws and relevant World Bank Environmental and Social Standards specifically ESS 2 Labor and working conditions requirements.

The LMP identified the commonalities and gaps between the World Bank's ESF standards and present legislation of Pakistan. Good practices are adopted, while issues/ areas of further improvement are proposed, to be followed during the implementation of the project.

Detailed policies and procedures on employment terms, non-discrimination, child and forced labour, and occupational health and safety are outlined. All contracts will include a code of conduct signed by workers at the time of hiring. A robust grievance mechanism is developed which allows workers to raise concerns and have them addressed promptly and fairly. The code of conduct sets out principles and expectations for ethical behavior and compliance with laws and Policies and disciplinary measures for non-compliance are specified in the same as well.

Training and Capacity Building

Training programs and capacity-building initiatives will be undertaken to enhance workers' skills and ensure compliance with safety and labor standards. Regular monitoring and reporting mechanisms will be implemented to ensure compliance with labor management procedures and address any issues that arise.

Conclusion

The LMP for the SSPDS project is designed to ensure the welfare and rights of all project workers, fostering a safe, fair, and conducive working environment. By adhering to these procedures, the project aims to manage labor-related risks effectively and comply with both national and international standards. The key highlight of this document is to categorically identify, assess, and prescribe on how to address the issues of Child and Forced Labour, Gender-based Violence, and Occupational Health and Safety. The project, in general, discourages the recruitment of children and practices of forced labor. It will primarily follow the provincial legislations.

Grievance Redressal Mechanism has been prepared. The mechanism included Code of Conduct, Individual Grievance Procedure, Collective Grievance Procedure, Gender-based Violence, and Workplace Sexual (and other) Harassments.

Acronyms

| | |
|-------|---|
| GRM | Grievance Redress Mechanism |
| ILO | International Labor Organization |
| IP/s | Implementing Partners |
| LMP | Labor Management Procedures |
| SSPDS | Strengthening Social Protection and Delivery System |
| SSPA | Sindh Social Protection Authority |

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Project Information

Project Overview

The Strengthening Social Protection Delivery System in Sindh (SSPDS) project, supported by the World Bank, aims to enhance the social protection mechanisms in Sindh. This initiative seeks to reduce inequities and improve access to social services for vulnerable populations, particularly focusing on maternal and child health.

Project Development Objective

The Project Development Objective (PDO) is to strengthen the social protection service delivery system and enhance accessibility and utilization of Mother and Child Health Services in selected districts in Sindh. The PDO will be measured by the following indicators:

- Establishment of a Unified Beneficiary Registry and Integrated Management Information System that uses energy-efficient technologies.
- Percentage of MCSP payments made to women in a timely manner in accordance with the guidelines.
- Increase in the percentage of institutional deliveries.
- Percentage of MCSP beneficiaries complying with at least 50% of scheduled visits.

Project Components

The SSPDS project consists of three main components as given below:

1. Strengthen Sindh Social Protection Service Delivery Systems

- Modernization of systems and processes to operationalize the Sindh Social Protection Authority (SPA).
- Enhancing logistics, administration, procurement, financial management, human resources, legal, auditing, monitoring and evaluation, and grievance redressal capacities.
- Development of energy-efficient/climate-smart information technology systems.
- Establishment of a Data Centre for secure connectivity with National Database Registration Authority's (NADRA) biometric verification system and National Socio-Economic Registry (NSER).
- Establishment of an Integrated Management Information System (IMIS) and Unified Beneficiary Registry (UBR) for Sindh.

2. Mother and Child Support Program (MCSP)

- Expansion of the existing MCSP pilot to additional districts.
- Provision of Conditional Cash Transfers (CCTs) and Social and Behavior Change Communication (SBCC) activities to promote better health and nutrition practices among pregnant and lactating women (PLWs) and children under two years of age.

3. Contingency Emergency Response (CERC)

- This component allows for the rapid reallocation of project funds in the event of a natural or man-made disaster or crisis to support emergency response and recovery.

Introduction

The Strengthening Social Protection Delivery System in Sindh (SSPDSS) project is a vital initiative aimed at enhancing social protection mechanisms in the province of Sindh. The Labor Management Procedures (LMP) are developed to manage the project-related labour issues and risks associated with the SSPDSS project. The project involves various Labor activities, including those performed by direct workers, contracted workers, and community workers.

The project identifies key risks and impacts associated with SSPDSS implementation. These risks pertain to workers' safety, community health and safety, and potential adverse Labor impacts. While the overall project's risk has been rated as "moderate" by the World Bank, indicating a nominal likelihood of significant adverse impacts, it is essential to manage these risks effectively.

Objectives of the LMP

To ensure adherence to national and international labor standards, the Labor Management Procedures (LMP) have been developed for the SSPDS project. The LMP provides clear guidelines on labor management, compliance with labor laws, and the protection of workers' rights throughout the project's implementation. The primary objective of the LMP is to outline the management of workforce in accordance with provincial and national labor laws, as well as World Bank standards, including provisions **on fair treatment, working conditions, occupational health and safety (OHS), prevention of forced labor and child labor and establish mechanisms for grievance redress**. The LMP will be incorporated into the bidding and contract documents for all contractors and supervising firms involved in the project.

Scope of the LMP

The LMP applies to all contract employees engaged in the SSPDS project, including direct workers, contracted workers, and third-party workers. It covers provisions on working conditions, occupational health and safety, code of conduct, and prevention of child and forced labor. The scope of the LMP for the SSPDS project includes the following key areas:

a. Identification of Required Labor:

- **Direct Workers:** Individuals employed directly by the Sindh Social Protection Authority (SPA) to manage and oversee the project. This includes roles in program management, procurement, financial management, environmental and social issues, and monitoring and evaluation.
- **Contracted Workers:** Workers engaged through contracts issued to primary suppliers and service providers. These contracts mandate adherence to labor laws and standards, ensuring safe and fair working conditions.

- **Community Workers:** Community-based organizations and local institutions involved in implementing the Mother and Child Support Program (MCSP). These workers assist with community engagement, mobilization, and data verification processes.

b. Labor and Working Conditions

- Adherence to the national and provincial labor laws, the applicable conditions on termination of contracts, working hours, paid leave, maternity leave, prevention of child and forced labor, and workers' representation.
- Adhering to the World Bank's Environmental and Social Standards (ESS2), which focus on promoting fair treatment, non-discrimination, and equal opportunity for workers.

c. Occupational Health and Safety (OHS)

- Implementing comprehensive OHS plans to prevent workplace accidents and injuries. This includes providing training on safety protocols, ensuring the availability of safety equipment, and conducting regular safety monitoring.
- Addressing health risks associated with working conditions and ensuring that all workers have access to necessary healthcare services and facilities.

d. Child Labor and Forced Labor

- Strictly prohibiting the use of child labor and forced labor in any project-related activities. Ensuring that all workers are legally eligible for employment and that their working conditions are voluntary and free from coercion.

e. Grievance Redress Mechanism (GRM)

- Establishing a multi-tiered GRM to provide all workers with a platform to raise concerns and seek redress. The GRM will be widely disseminated and easily accessible to ensure that workers can voice their grievances without fear of retaliation.
- Ensuring timely and effective resolution of grievances through a transparent and fair process.

f. Fair Treatment and Non-Discrimination

- Promoting non-discriminatory practices in hiring, promotion, and other employment-related activities. Ensuring that all workers are treated with respect and dignity, regardless of their gender, race, religion, or social status.
- Implementing policies to prevent harassment and discrimination in the workplace.

g. Capacity Building and Training

- Providing continuous training and capacity-building opportunities for all workers, including those employed by contractors and community organizations. This includes training on labor rights, safety protocols, and grievance redress mechanisms.
- Strengthening the capacity of the Project Management Unit (PMU) and other relevant bodies to effectively manage labor-related issues and ensure compliance with the LMP.

h. Monitoring and Evaluation

- Establishing robust mechanisms for monitoring and evaluating labor use and compliance with the LMP. This includes regular monitoring, feedback from workers, and performance assessments to identify areas for improvement.
- Reporting on labor management practices and outcomes as part of the overall project monitoring and evaluation framework.

Applicable Laws in Project

Pakistan has ratified 36 ILO's conventions including its eight Core Conventions covering four areas, namely, child labor, forced labor, discrimination, right of freedom of association and to bargain collectively. The Constitution of Pakistan guarantees basic labor rights; prohibits child labor, forced labor and discrimination based on sex, promotes freedom of association, safe working conditions and social security for all. The Constitutional guarantees and commitments in the relevant ILO conventions are reflected in various labor laws in place in Pakistan. Labor laws have been promulgated in Pakistan and in the province of Sindh to ensure the implementation of the international commitments and Constitutional guarantees on ground. The following labor laws are applicable to the contracted workers and primary supply workers engaged in the SSPDS project:

1. **The Sindh Workers' Compensation Act, 2015:** This law ensures compensation for workers in the event of injury or death while performing their duties, offering financial protection and support to affected workers and their families.
2. **The Sindh Minimum Wages Act, 2015:** This act guarantees equal remuneration for work of equal value for both men and women, promoting gender equality in the workplace and ensuring fair wages.
3. **The Sindh Maternity Benefits Act 2018:** The Maternity Benefits law regulates employment conditions, providing entitlements such as paid leave, pre- and post-delivery medical care, nursing, and special work arrangements for eligible women. It mandates six weeks of paid leave before delivery and six weeks after childbirth.
4. **The Sindh Occupational Safety and Health Rules, 2019:** These rules emphasize the importance of maintaining a safe working environment for all employees. Employers are required to implement comprehensive safety measures to prevent workplace accidents and occupational diseases.
5. **The Sindh Prohibition of Employment of Children Act, 2017:** It is designed to protect children from exploitation and ensure their right to education. It prohibits the employment of children under the age of 14 in any establishment.
6. **The Sindh Industrial Relations Act, 2013:** Act provides a comprehensive legal framework for labor relations in the province. It allows workers to form unions and outlines the procedures for their recognition and registration.

These labor laws are applicable to the contracted workers and primary supply workers associated with the project. In contrast, the terms of employment for direct workers will be regulated under the rules and regulations applicable to government employees. Nonetheless, the working conditions of these direct

workers will be covered under the Labor Management Procedures (LMP) to ensure comprehensive protection and compliance with labor standards throughout the project.

Use of Labor Under the SSPDS

The project involves a diverse workforce, including core staff and workers operating from both the head office and various district offices.

Types of Workers in the SSPDS Project

Multiple types of workers will be engaged in the projects and interventions associated with the Strengthening Social Protection Delivery System (SSPDS). While the main workforce will consist of Project Implementation Unit (PIU) staff, most of these workers will be involved in district-level activities and different interventions supervised by Implementing Partners (IPs).

1. Direct Workers

Direct workers are individuals employed directly by the Sindh Social Protection Authority (SPA) to manage and oversee the SSPDS project. This category includes the program management team, responsible for overall project coordination, implementation, and oversight; technical experts specializing in social protection, health, financial management, procurement, environmental and social safeguard, and monitoring and evaluation; and administrative staff handling day-to-day administrative tasks, logistics, and operational support.

Timing of Labor Requirements: *The direct workers in the PIU will remain available throughout the Project life cycle. Contracted workers by the Implementing Partners will remain with the project till the implementation process.*

2. Contracted Workers

Contracted workers are engaged through agreements with primary suppliers and service providers to perform specific tasks required by the project or the implementing partner firm/s. This category includes service providers delivering specific services such as enrollment of pregnant and lactating women, training, capacity building, technical support, infrastructure development; and consultants engaged for short-term assignments requiring specialized expertise. A major chunk of contracted workers will be managed by the Implementing Partner firm/s.

3. Primary Supply Workers

Primary supply workers are engaged in providing goods and materials necessary for the SSPDS project. This category includes suppliers and vendors responsible for supplying information communication technology supplies, printing materials, office equipment, and other essential goods.

4. Community Workers

Community workers are mobilized to support project activities at the grassroots level. This category includes local volunteers who assist with community engagement, outreach, and mobilization efforts; community health workers who support the implementation of the mother and Child Support Program (MCSP) by

providing health education and support to mothers and children; and community-based organizations (CBOs) involved in executing project activities and verifying data.

5. Women workers

The SSPDSS Project actively promotes women's empowerment. Currently, over 20% of the project's staff are female. Additionally, the majority of the workers and staff of the implementing partners (IP) are women, including doctors, paramedical staff, and midwives.

6. Migrant workers

There is no likelihood of engaging migrant workers by the contractors and primary suppliers.

Assessment of Key Potential Labor Risks

Key Labor Risks:

Expected key labor risks in the projects/ interventions and activities under the Project include:

- I. Hiring direct workers, including consultants, specialists, and support staff such as drivers and office boys, by the PIU and under various interventions by the IPs may lead to non-compliance with labor standards.
- II. Engaging experts and consultants regulated under public sector employment conditions may result in vulnerabilities for support staff hired by these experts and consultants for project execution.
- III. Suppliers and vendors engaged by the PIU and IPs for providing essential supplies (medical equipment, electronic devices, furniture, machinery, office materials) may employ workers without adequate protection under labor laws and social protection schemes.
- IV. Service providers and contractors performing project-related activities may not comply with labor laws and social protection schemes for their workers.
- V. Employment terms, working conditions, and remuneration of drivers and support staff hired by the PIU, IPs and contractors may not align with labor laws and social security regulations.
- VI. The PIU, located in a multi-story building with lifts and machines (heating, cooling systems), may face issues related to emergency preparedness, including insufficient emergency exits, fire extinguishing arrangements, alternative paths, stairs, and employee training.
- VII. Promoting women's empowerment within the project could be challenging due to potential discrimination based on sex, gender, age, disability, culture, language, ethnicity, or religion in terms of remuneration, recruitment, hiring, termination, working conditions, promotion, or employment terms, women specific arrangements at workplace and provision of benefits to women workers under labor laws.
- VIII. There is a potential threat of gender-based violence (GBV) and sexual harassment within the project environment, IPs and other contractors.
- IX. Lack of consultation, social dialogue, and workers' non-participation in management decisions may occur.
- X. There is a possibility of child labor, forced labor, restriction on workers' right to association, and discrimination in employment and remuneration, particularly among workers engaged by vendors.

Labour Management Procedures (LMP)

Labor Management Procedures (LMP) refers to a comprehensive framework outlining the policies, processes, and guidelines for managing labor-related issues within a project or organization. The LMP is designed to ensure that labor practices are fair, transparent, and in compliance with relevant laws and regulations. It addresses various aspects of labor management, including:

Policies and Procedures

Fair Treatment

Decisions regarding the employment or treatment of workers in the Project will be based solely on inherent job requirements. The principle of equal opportunity and fair treatment will guide all employment practices. Pakistan has ratified the International Labour Organization's "Equal Remuneration Convention, 1951 (No. 100)" and "Discrimination (Employment and Occupation) Convention, 1958 (No. 111)." The Constitution of Pakistan prohibits discrimination based on sex and guarantees equal rights and opportunities for all citizens. The Sindh Minimum Wages Act, 2015, prohibits wage discrimination based on sex and ensures equal remuneration for work of equal value. There will be no discrimination of any kind under the SSPDS project. Discrimination based on sex, religion, political affiliation, sect, colour, caste, creed, or ethnic background is strictly prohibited in the enforcement of this Act. In cases of delayed, non-payment, or less payment of wages, workers may use the project Grievance Mechanism or approach the Authority under the Sindh Payment of Wages Act, 2015. Individual grievances can also be lodged in the concerned Labor Court under the Sindh Industrial Relations Act, 2013.

Policies Towards Contractors

The Project and implementing partners (IP/s) will include the Labor Management Procedure (LMP) in Bidding and contract documents, ensuring potential bidders are aware of and can comply with these provisions. Compliance with these clauses will be enforced throughout the contract's duration. Contractors must make all LMP-related documentation available for inspection by the IP/s and project management.

Contractual arrangements with staff must be clearly defined, with no discrimination based on sex, religion, caste, creed, color, political inclination, or place of origin in employment. Remuneration will be based on the principle of equal pay for equal work. Child labor, forced labor, and bonded labor are prohibited. Workers will be employed according to the Sindh Terms of Employment (Standing Orders) Act, 2015 (Sindh Act No. XI of 2016). Relevant provisions of this law will guide employment, leave, disciplinary proceedings, gratuity, group insurance, retrenchment, lay-off, and termination.

Occupational Health and Safety (OHS)

SSPDS will comply with all applicable legislation and requirements related to occupational health and safety hazards. Active participation in eliminating OHS risks through risk assessment and promoting appropriate skills, knowledge, and attitudes towards hazards will be encouraged. This includes Emergency Preparedness, Clear protocols for emergency situations, including first aid, and evacuation procedures.

Guidelines will be displayed prominently in workplace premises. Health and safety provisions of labor laws will cover all project workers. The project will continually improve the OHS management system and performance through commitment.

Emergency protocols

SSPDSS will ensure the safety and well-being of all employees at the workplace during unexpected situations. These protocols typically cover a range of potential emergencies, including fires, medical emergencies, and general emergencies. Following protocols must be adopted for various emergency situations:

Fire Emergency

- **Evacuation Plan:** Clear instructions for evacuating the building, including marked exits and assembly points.
- **Fire Drills:** Regular fire drills to ensure employees are familiar with evacuation routes and procedures.
- **Firefighting Equipment:** Accessible and maintained fire extinguishers, fire blankets, and other firefighting resources.
- **Communication:** Procedures for alerting emergency services and notifying all staff of the fire.

Medical Emergency

- **First Aid:** Provision of first aid kits in accessible locations and training of selected employees in basic first aid and CPR.
- **Emergency Contacts:** Ready access to emergency contact numbers for medical services.
- **Procedure for Reporting:** Clear instructions on who and how to notify in the event of a medical emergency.

Natural Disasters (e.g., Earthquakes, Floods)

- **Preparedness Plans:** Specific plans tailored to likely natural disasters in the area.
- **Safe Areas:** Designated safe zones within the building for shelter during disasters like earthquakes.
- **Evacuation Routes:** Clearly marked evacuation routes and procedures for leaving the building safely during disasters.

Security Threats (e.g., Active Shooter, Bomb Threat)

- **Lockdown Procedures:** Protocols for locking down the building in case of security threats.
- **Alert System:** Systems for informing employees about the threat and providing ongoing updates.
- **Communication with Law Enforcement:** Guidelines on notifying and cooperating with law enforcement.

Communication During a Crisis:

- **Internal Communication:** Establish a reliable communication system to inform all employees of the situation and ongoing updates, using methods like mass notification systems, text alerts, or intercom announcements.
- **External Communication:** Designate a spokesperson to handle external communications, including interactions with the media, if necessary, to avoid misinformation.

General Emergency Communication

- **Emergency Contact Information:** Comprehensive lists of all relevant emergency contacts, including internal roles and external services.

- **Communication Tools:** Utilization of intercoms, emails, or alarm systems to quickly disseminate information.

Training and Drills

- **Regular Training:** Routine training sessions for all employees on emergency procedures.
- **Emergency Drills:** Conducting regular drills for different types of emergencies to ensure everyone knows their role and actions to take.

Health and Safety Committees

Each project intervention will establish Health and Safety Committees at the headquarters level, including worker representation and at least one woman. The Committee will:

1. Supervise the health and safety system and make recommendations for review.
2. Discuss workplace incidents resulting in injury, illness, or death.
3. Monitor implementation of health and safety provisions under the LMP and review progress quarterly.
4. Promote and develop a health and safety culture within the Project.

Each IP will designate a Health and Safety Officer (HSO) responsible for implementing OSH provisions, establishing a health and safety management system, coordinating training, and ensuring LMP and legal provisions compliance. The HSO will ensure the availability and use of standardized PPEs, report and document accidents, investigate incidents, and issue bi-annual health and safety reports.

All accidents must be reported to the project Environmental and Social Safeguard Specialist, General Manager Admin and relevant legal authorities within 24 hours. A detailed investigation report, including remedial measures and compensatory arrangements, should be submitted within 72 hours which will subsequently be submitted to the World Bank counterpart within five days of submission of report

Training and Awareness

All project interventions will ensure worker awareness and training on health and safety, develop and disseminate informational material, display health and safety notices, conduct periodic emergency drills, and ensure contractors and suppliers comply with the LMP.

Forced Labor Prohibition

The Constitution of Pakistan prohibits all forms of forced labor and slavery, including human trafficking. The Bonded Labor System (Abolition) Act, 1992 (amended 2018), prohibits forced and bonded labor. The District Vigilance Committees (DVCs) monitor the implementation of these laws.

The Prevention and Trafficking in Persons Act, 2018, also prohibits human trafficking for labor. Contractors will not engage in human trafficking and will report any instances to authorities. Forced and bonded labor are prohibited in all SSPDS project. Firms and contractors, especially primary suppliers, must ensure compliance with the Sindh Bonded Labour System (Abolition) Act, 2015. Violators and victims will be treated according to the provisions of the Act.

Age of Employment

The applicable law is the Sindh Prohibition of Employment of Children Act, 2017, which defines a child as a person below the age of 15 years. Under this law, employment of persons under 15 years is prohibited. Additionally, persons aged 15 to 18 years are prohibited from engaging in hazardous occupations and processes, including the collection of E-waste, and the dismantling and disposal of computers, laptops, and other ICT equipment. Persons below 18 years of age will be prohibited from any type of employment as direct workers and from engagement in hazardous work, including E-waste management, by vendors, consultancy services, and entities providing support services to the IP/s under SSPDS.

Terms and Conditions

Terms of Employment/Employment Letter: At the time of engagement, all project workers will be provided with an employment letter clearly stating the terms of engagement and conditions during employment. The letter should be addressed to the employee and include their designation, place of duty, remuneration, nature and type of employment, assignment-specific terms, compensation, and benefits (**Annex-I**). For direct workers, the terms of employment for regular employees are regulated under government rules, while contracted employees are appointed under specific terms and conditions as per the Industrial and Commercial Employments (Standing Orders).

Specific Terms and Conditions:

- According to The Sindh Terms of Employment (Standing Orders) Act, 2015 every worker, at the time of appointment, transfer, or promotion, will receive a written order showing the terms and conditions of their service.
- Contract workers will be regulated under laws relating to Industrial and Commercial Employment (Standing Orders), Factories, and Shops and Establishments.
- Regularization, disciplinary proceedings, inquiries, termination, notice pay, gratuity, and group insurance will be governed by the Industrial and Commercial Employment (Standing Orders) Ordinance.

Non-discrimination and Equal Opportunities

The Constitution of Pakistan prohibits discrimination based on sex and guarantees equal rights and opportunities for all citizens. The Sindh Minimum Wages Act, 2015, includes provisions against discrimination.

Discrimination based on sex, religion, caste, creed, ethnicity, political inclination, color, or any other reason during recruitment, promotion, remuneration, workload, work arrangement, benefits, and training is prohibited. There will be no discrimination in any SSPDS intervention. All workers, including women and migrant workers, will be protected under the relevant laws.

In cases of delayed or non-payment of wages and other financial benefits, if the internal Grievance Mechanism does not resolve the issue, workers may approach the Authority under the Payment of Wages Act, 2015 or lodge individual grievances in the Labor Court under the Sindh Industrial Relations Act, 2013.

Working Hours

The Factories Act and Shops and Establishments laws regulate working hours for workers in industrial and commercial establishments, setting them at 8 hours a day and 48 hours a week. SSPDS projects will adhere to these regulations.

Rest and Holidays

Holidays, rest, sick leaves, annual paid leaves, and festival holidays for workers are regulated under the Factories Act and Shops and Establishments Ordinance.

Special Provisions for Women:

- Free and safe transportation will be provided to women workers for night work.
- Government employees and those recruited for project activities will be regulated under government leave rules and medical entitlements. Women workers, other than direct employees, will be provided with maternity leave of 112 days as per the ILO's Maternity Protection Convention, 2000 (No.183).
- Daycare facilities will be provided for children under 6 years of age in project where women are employed, with necessary facilities and a qualified attendant.

Drinking Water and Sanitation

Employers must provide clean drinking water, urinals, washing facilities, and toilets at the workplace. Separate washrooms and toilets for men and women must be established and maintained in all project-related workplaces.

First Aid

PIU, IP/s and contractors must establish and maintain first aid facilities for medical emergencies, including necessary medicines and equipment. At least one trained person in first aid should be available during working hours.

Overtime

According to the Factories Act and Shops and Establishments laws, no overtime work will be required without prior consent and should not exceed two hours a day. Overtime wages will be calculated at double the ordinary rate.

Sexual Harassment of Women

Cases of sexual harassment will be addressed under the Protection Against Harassment of Women at the Workplace Act, 2010. An Inquiry Committee, including one woman, will handle such cases. Details for creating the committee is provided at **Annex II**.

Differently Abled Persons

There will be no discrimination against persons with disabilities in employment, training, work allotment, promotion, or remuneration. Workplaces will be adapted to be disability friendly.

Minimum Wage

The Sindh Minimum Wages Act, 2015, sets the minimum wage rates, which will be adhered to for all contract workers. Daily wages will be paid at market rates with a uniform formula ensuring they receive social protection contributions.

Payment of Wages

Wages will be paid via cheque or online transfer. Deductions will be made only in accordance with the Sindh Payment of Wages Act, 2015. Daily wage workers will be paid daily in cash with proper receipts and records.

Application of Labor Management Procedures:

The Labor Management Procedure (LMP) applies to all project workers, regardless of their employment status—whether full-time, part-time, temporary, seasonal, or migrant. According to Environmental and Social Standard 2 (ESS2), the LMP is applicable to the project in the following ways:

- Individuals employed or engaged directly by the Social Protection Secretariat of Sindh (SSPS), including government officials/officers from other agencies or ministries assigned to work specifically on the project.
- Individuals employed or engaged by contractors to perform tasks related to the core functions of the project, regardless of their location.
- Individuals employed or engaged by SSPDS' primary suppliers.

Nature of Work and Characteristics of Workers:

- The Project Implementation Unit (PIU) manages a diverse staff, including government officials, specialists, consultants, and support staff, based at the Head Office. The SSPDS operates from a rented building where all support services, such as lift operations, parking, janitorial, and cleaning services, are managed by the SSPDS.
- At this stage, government employees, consultants, and other staff have been hired at the central level, while district offices have recruited a specified number of officers in each district.
- For implementation purposes, SSPDS relies on implementing partners who have engaged a certain number of employees across different categories at different health facilities.

Activities Requiring Procurement of Firms/Organizations:

To support the following activities, different firms and organizations will be procured:

- Impact Evaluation Firm
- Operation Review Firm
- Any other required services

Implementation of LMP

The SSPDS project involves the hiring of various categories of staff, including direct workers such as consultants, specialists, and support staff (including drivers and office boys), engaged directly by the Project Implementation Unit (PIU) and under various interventions by the Implementation Partners (IPs).

Responsibilities of PIU

The Project Implementation Unit (PIU) is responsible for the effective implementation of the Labor Management Procedure (LMP) for the SSPDS project. The PIU will maintain labor management policies and procedures in alignment with local labor laws and international labor standards, ensuring that these are clearly communicated to all employees, IPs, and contractors.

Regular monitoring of IPs and contractors' compliance with labor laws, standards, and the LMP will be conducted, including periodic inspections to ensure adherence to labor policies and procedures. The PIU will facilitate worker participation by establishing committees such as the Canteen Committee, Health and Safety Committee, Worker's Management Committee, and Inquiry Committee for Sexual Harassment cases.

Training programs on labor rights, occupational safety and health (OSH), and grievance redress mechanisms will be organized for employees, contractors, and worker representatives. Continuous capacity-building initiatives will enhance understanding and compliance with the LMP. An effective grievance redress mechanism (GRM) will be maintained to address labor-related grievances and disputes, ensuring accessibility, transparency, and timely resolutions.

PIU will ensure that all workers will be kept informed about their rights and responsibilities under the LMP. Promoting the participation of women in worker organizations and committees will be a priority, ensuring adequate representation in executive bodies proportionate to their strength in the project. The PIU will ensure that IPs and contractors adhere to labor management policies and procedures, including specific labor management requirements in contracts and regularly monitoring compliance.

Robust health and safety policies will be implemented to ensure a safe working environment, with regular monitoring and necessary resources to address any issues identified. Comprehensive records of all labor management activities, including training, grievances, and resolutions, will be maintained quarterly by PIU's E&S Safeguard Specialist and GRM Officer along with and Human Resource representative and respective Implementing Partner/s and all contractors designated staff.

Responsibilities of IP/s

The Implementation Partners (IPs) will be responsible for implementing Labor Management Procedure (LMP) activities. The Project Director/Head, through effective coordination and a robust monitoring mechanism, will ensure the provisions of labor-related policies and procedures are properly implemented in the project and activities under their supervision. This includes overseeing recruitment, engagement, working conditions, terms of employment, occupational safety and health (OSH) arrangements, worker protection, and the Grievance Redress Mechanism (GRM) within the project and its interventions. The Project Director/Head will also be responsible for the engagement and management of contractors and sub-contractors involved in the project activities. Training and orientation activities on the LMP, including OSH provisions, will be carried out under their supervision and coordination.

To ensure the proper implementation of the LMP, the Project Director/Head will establish and manage a monitoring and review mechanism. This will involve setting up coordination and implementation committees, designating officers for specific tasks such as implementation, training, communication, awareness campaigns, and addressing workers' grievances. These committees and designated officers will involve the participation of workers and other stakeholders to facilitate effective implementation.

Moreover, the IP will take initiatives to organize sessions aimed at raising community awareness about compliance with relevant standards, including labor standards, OSH provisions, and prevention of sexual

violence and harassment. These sessions will ensure the effective and efficient participation of key stakeholders, reinforcing the commitment to upholding these standards throughout the project.

Responsibilities of Contractors:

Firms, contractors, and subcontractors through their designated head/in charge will be responsible for implementing the Labor Management Procedures (LMP) for their employees. Every firm or contractor working on various interventions under the Implementation Partners (IPs) within the SSPDS project must commit to adhering to the provisions of the SSPDS LMP. This includes ensuring the protection and well-being of their workers engaged in any service or work related to projects and interventions. Contractors must also cooperate fully with the project management to ensure the effective implementation of the LMP.

Worker's Protection:

Social Protection:

Employers will also be responsible for workers' group insurance as provided under the Industrial and Commercial Employments (Standing Orders) Ordinance.

Worker's Compensation: Contracted workers will be entitled to compensation in case of injury, occupational diseases or death as provided under Workmen's Compensation Act, 1923. Aggrieved workers or their heirs can approach the respective courts of Worker's Compensation Commissioners established under the Ibid enactment. Until proved through an inquiry conducted under the law wherein accused worker must be given an opportunity of reply and personal hearing also Workers' Organization.

Worker's Organization:

Pakistan has ratified the ILO's Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) and the Right to Organize and Collective Bargaining Convention, 1949 (No. 98). The country has established a framework of industrial relations laws that regulate labor relations, the formation of trade unions, determination of collective bargaining, and workers' participation in management. The Sindh Industrial Relations Act, 2013, and the Industrial Relations Act, 2012 (federal law), govern the registration of trade unions and the regulation of industrial relations.

Workers involved in projects or activities linked with the SSPDS project may associate themselves in organizations or join organizations of their choosing without any restrictions or conditions imposed by the management, consultancy firms, or contractors. Employees and workers can form trans-provincial unions or associations under the Industrial Relations Act, 2012, or establish their organizations under the Sindh Industrial Relations Act, 2013. Under these laws, the employer or management must not interfere with or influence the process of union formation or restrict workers from joining any union or federation. Any such interference by the employer or their agent will be considered an unfair labor practice and is punishable under the relevant provisions of these enactments by competent courts.

Worker organizations formed under the relevant industrial relations laws will encourage the participation of women and ensure that the executive bodies of their organizations represent women in proportion to their total strength in the project or activity.

Workers' Participation

Employers, managements of various activities under IPs, the project, consultancy firms, and contractors in connection with SSPDS will ensure worker participation in consultation and decision-making. This will be facilitated particularly through the representation of workers in committees at various levels, including the following:

- Canteen Committee
- Health and Safety Committee
- Worker's Management Committee
- Inquiry Committee regarding cases of Sexual Harassment

Executives and worker representatives of these organizations will be provided with necessary information about the project activities to raise awareness among their rank and file and for negotiation purposes. Workers' participation in these committees will be nominated by the Collective Bargaining Agent (CBA). In the absence of a CBA and union, worker representatives will be elected.

Workers' Right to Information

The following documents must be displayed at conspicuous places by consultancy firms and contractors for the information of workers:

- Notice of daily working hours
- Notice of weekly holidays
- Notice highlighting types of leaves admissible to workers
- Information about committees
- Notice of wage day
- Information material on Occupational Safety and Health (OSH)
- Grievance Redress Mechanism (GRM)

Management of Contractors

In the context of Labor Management Procedures (LMP) for projects like SSPDS, the selection process for contractors typically involves several key steps to ensure compliance with labor standards and the protection of workers' rights. The due diligence required during the hiring of contractors is detailed in **Annex-III**. SSPDS will ensure that Implementing Partners (IP/s) and contractors monitor, maintain records, and report on labor management terms and conditions.

Contractors must provide workers with documentation of all recruitments, payments, including social security benefits, pension contributions, and other entitlements, regardless of whether the worker is on a fixed-term contract, full-time, part-time, or temporary. They are expected to fairly execute their contracts, ensuring full compliance with all provisions of the Labor Management Procedures (LMP). Contractors and their subcontractors must avoid any unfair labor practices and are required to maintain and produce records when requested by IP/s and management.

Contractors must maintain the following records:

- **Labor Conditions:** Records of workers engaged under the project, including contracts, induction registry, hours worked, leave records, maternity benefits, remuneration and deductions (including overtime), negotiations with workers' organizations, and compliance with collective bargaining agreements (if any).

- **Safety:** Records of incidents, corresponding inquiries and follow-ups, first aid cases, high potential near misses, remedial and preventive activities, and rehabilitation measures.
- **Workers:** Number of workers, origin (expatriate, local, non-local nationals), gender, age, evidence of no child or forced labor, and skill level (unskilled, skilled, supervisory, professional, management).
- **Training/Induction:** Dates, number of trainees, and topics covered.
- **Worker Grievances:** Details including occurrence date, grievance, date submitted, actions taken with dates, resolution (if any) and date, and follow-up actions. Grievances listed should include those received since the preceding report and unresolved ones from previous reports.

Implementing Partner/s and Contractors are responsible for submitting bi-annually reports on LMP implementation for workers engaged in SSPDS-related interventions to the SSPDSS management. In the case of the contract's duration is less than six months, reports will be submitted on monthly basis. SSPDS, along with all contractors and IP/s, will establish a monitoring and evaluation system to assess contractors' performance bi-annually and issue evaluation reports. The principal contractor must ensure subcontractors' compliance with the LMP for workers involved in SSPDS interventions. This includes ensuring record maintenance for random evaluations by the IP regarding subcontractors' compliance with sections as above.

The responsibility for ensuring LMP implementation through contractors and subcontractors lies with the IP/s, i.e., the management of the project/intervention within the respective IP under SSPDS. SSPDS must be vigilant in monitoring contractors' adherence to LMP, particularly concerning employment terms and conditions and Occupational Safety and Health (OSH) provisions for contracted workers.

Community Workers

There is a possibility of engaging community workers for awareness, orientation, and social mobilization campaigns. These community workers will be voluntary and will not receive any remuneration. However, the IP/s and project management will ensure that no child labor, forced labor, or bonded labor is involved in the work performed by the community.

The provisions regarding working conditions, working hours, rest, holidays, and non-discrimination based on sex, race, color, religion, ethnicity, political inclination, and place of origin will apply to community workers. All health and safety provisions outlined above are also applicable to community workers. Community workers' grievances will be addressed through the IP/s Grievance Redress Mechanism (GRM) Committees. The concerned GR Committee would choose a representative of the community workers as a member if any issue related to community workers is under discussion.

Primary Supply Workers

Primary suppliers are typically formal businesses that procure and produce materials to high standards. As responsible entities, they comply with all applicable laws, including labor laws. These workers will also exercise the right to freedom of association and collective bargaining. Primary suppliers must ensure that no child labor, forced labor, or bonded labor is employed in their establishments. Primary supply workers are also covered under compensation laws.

Primary suppliers must ensure the occupational health and safety of their workers. They are required to report accidents, fatalities, or serious injuries to the IP/s, inform regulatory authorities, and the project management in accordance with legal obligations and LMP provisions. They must also ensure that their workers have access to an internally established Grievance Redress Mechanism. Information on non-discrimination, violence against women, and sexual harassment will also be provided. Additionally, workers will be informed about the relevant provisions of the LMP.

All primary suppliers will update the IP/s and project management on the status of LMP application concerning their workers monthly. Signing contracts with primary suppliers that incorporate the mentioned provisions or explicitly include LMP provisions in the contract/delivery order will facilitate compliance. The IP/s and SSPDS will ensure that all primary suppliers adhere to the LMP through a monitoring and evaluation mechanism.

Workers' Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) will be in place in SSPDS including IP/s for the “project workers” to ensure that grievances of the workers are timely redressed. Worker’s grievances may be of many types which may include conflict with supervisors, workplace issues, OSH, issues relating to wages, delay in payment of wage, unauthorized deduction from wages, confrontation with the co-workers, non-compliance of LMP and social difference between workers, etc. The workers must be informed about the existence of the Grievance Redress Mechanism (GRM) at the time of their entry into employment and during their employment.

A senior official will be notified as Focal Person in every project / intervention who will be responsible to receive worker’s complaints and redress their grievance in a specific timeline in the light of defined SOPs under the overall supervision of Grievance Redress Committee (GRC).

A Grievance Redress Committee will be constituted and notified by the IP/s/Contractors with the following mandate:

- Oversee the functioning and effectiveness of the Grievance Redress Mechanism (GRM).
- Assist Focal Persons in facilitating discussions and negotiations with relevant parties involved in disputes.
- Implement Standard Operating Procedures (SOPs), timelines, and a coordination framework as outlined in **Annex IV**.
- Conduct quarterly reviews and assessments of GRM performance and progress.
- Appoint the GRM Focal Person as the Convener of the Committee.
- Ensure the Grievance Redress Committee (GRC) includes representatives from the workforce, contractors, and civil society.
- Guarantee that at least one member of the Committee is a woman.

The Project will ensure that lodging of complaints is simple, and workers can have easy access to the GRM. Complaints through Individual/Collective grievance forms may be submitted to committee for registration of complaints through formal submission or through emails for quick response to the complainants. Progress may be retrieved via email or SMS or call. Record of complaints and action taken will be maintained,

reviewed and evaluated after every three months. Individual and collective complaints forms are attached as **Annex V (a) and (b)**.

GRM under LMP in the IP/s should also be easily accessible to the contracted, primary supply workers and community workers.

Annex-I: Written Particulars of Employment

1. **Name of Employer:** _____
2. **Name of Employee:** _____
3. **Date Employment Began:** _____
4. **Remuneration with Allowances:** _____
5. **Date of Payment of Remuneration:** _____
6. **Normal Hours of Work:** _____
7. **Nature of Work:** _____
8. **Probation Period:** _____
9. **Weekly Rest:** _____
10. **Annual Holiday Entitlement:** _____
11. **Paid Public/Festival Holidays:** _____
12. **Payment During Sickness:** _____
13. **Pension Schedule, Social Security Contribution, Provident Fund, Gratuity Schedule, etc.**
14. **Any Other Benefit:** _____

- Employees are free to join a trade union or staff association recognized by the undertaking.
- Grievance and disciplinary procedures must be followed when a grievance arises, or disciplinary action is needed.
- Maternity and nursing benefits, in accordance with the SSPDS LMP, will apply if the employee is female and entitled to these benefits.
- Employment can be terminated with one month's notice by either party.

Note: Please enter "Nil" for any of the above items that are not applicable.

Employer's signature.....

Employee's signature.....

Witness.....

Witness

Date.....

Annex-II: Committee Structure, Roles and Responsibilities under the Protection Against Harassment of Women at the Workplace Act, 2010

For managing cases of sexual harassment under the Protection Against Harassment of Women at the Workplace Act, 2010, the Project Implementation Unit (PIU), Implementation Partner (IP) and contractor should establish Inquiry Committees as per the legal requirements and best practices. Here are more details regarding how these committees could be structured and function:

1. Composition of the Committee

- I. Each committee should include at least one woman, preferably more, to ensure gender sensitivity and fairness in the proceedings.
- II. The committee should ideally consist of members from different departments to bring diverse perspectives and maintain impartiality.
- III. It might also be beneficial to include a legal advisor or an HR professional specialized in gender issues as part of the committee.

2. Role and Responsibilities

- **Investigation:**

- I. The committee is responsible for investigating all complaints of sexual harassment in a confidential, timely, and thorough manner.
- II. Investigations should be carried out with discretion to protect the privacy of all involved parties.

- **Recommendations:**

- I. Based on the findings, the committee should recommend actions consistent with organizational policies and the law.
- II. Recommendations can range from warnings to dismissal, depending on the severity of the case.

- **Preventive Measures:**

- I. The committee should also propose and implement preventive measures to ensure a safe work environment.

3. Training and Awareness

- I. Committee members should receive regular training on handling sexual harassment cases, legal implications, and sensitivity training.
- II. PIU, IP and contractor should conduct regular awareness programs for all employees to educate them about the norms and the mechanisms in place for reporting harassment.

4. Reporting Mechanism

- I. The process for lodging complaints should be clear and easily accessible to all employees.
- II. Providing multiple channels (e.g., email, in-person, anonymous suggestions) can encourage more victims to come forward.

5. Confidentiality and Protection

- I. Confidentiality is crucial in handling these cases to protect the complainant and the accused until a final decision is made.
- II. Measures should be in place to protect complainants and witnesses from any form of retaliation during and after the investigation process.

6. Documentation and Record-Keeping

- I. Detailed records of all cases, investigations, and outcomes should be maintained while respecting the privacy of the individuals involved. This documentation will be crucial for legal compliance and for reviewing the effectiveness of the workplace harassment policy.

Annex-III: Due Diligence during hiring of contractors

Due diligence during the hiring of contractors is a critical step to ensure that potential contractors can comply with the Labor Management Procedures (LMP) and meeting the project's labor standards. Below is a comprehensive guide to conducting due diligence:

1. Pre-qualification Assessment:
 - Background Check: Review the contractor's history, including previous projects, compliance with labor laws, and any past violations or disputes.
 - Financial Stability: Assess the financial health of the contractor to ensure they have the resources to complete the project and maintain labor standards.
2. Labor Management Practices:
 - Policies and Procedures: Evaluate the contractor's existing labor management policies and procedures, including those related to wages, working conditions, health and safety, and grievance mechanisms.
 - Human Resources Management: Assess the contractor's HR practices, such as hiring, training, and managing workforce diversity and inclusivity.
3. Compliance with Labor Laws:
 - Legal Compliance: Verify that the contractor complies with national labor laws and regulations, as well as international labor standards where applicable.
 - Certification and Accreditations: Check for relevant certifications, such as ISO standards for occupational health and safety.
4. Experience and Performance:
 - Past Performance: Review the contractor's track record on similar projects, focusing on their ability to manage labor effectively and meet project timelines and quality standards.
 - References and Testimonials: Contact previous clients or stakeholders to gather feedback on the contractor's performance and labor management practices.
5. Health and Safety Records:
 - Safety Management Systems: Assess the contractor's occupational health and safety management systems, including risk assessments, safety training programs, and incident reporting mechanisms.
 - Incident History: Review records of past safety incidents, accidents, and their resolutions.
6. Grievance Mechanisms:
 - GRM Effectiveness: Evaluate the contractor's grievance redress mechanism to ensure it is accessible, transparent, and effective in resolving labor-related issues.
 - Worker Feedback: Consider feedback from workers about the effectiveness and fairness of the grievance mechanism.
7. Capacity and Resources:
 - Workforce Capacity: Ensure the contractor has the necessary workforce and expertise to meet project requirements.
 - Equipment and Facilities: Assess the availability and condition of the contractor's equipment and facilities to ensure they can provide a safe working environment.

8. Environmental and Social Impact:

- ESG Practices: Review the contractor's environmental, social, and governance (ESG) practices to ensure they align with the project's sustainability and social responsibility goals.
- Community Relations: Assess the contractor's approach to managing relations with local communities and mitigating any adverse social impacts.

9. Documentation and Reporting:

- Record Keeping: Ensure the contractor maintains comprehensive records of their labor management practices, including employee contracts, payroll records, and training logs.
- Reporting Systems: Verify that the contractor has robust reporting systems to provide regular updates on labor management and compliance with LMP requirements.

10. Site Visits and Inspections:

- On-site Assessment: Conduct site visits to observe working conditions, safety practices, and overall compliance with labor standards.
- Interviews with Workers: Speak with workers directly to understand their experiences and identify any potential labor issues.

Annex IV: Standard Operating Procedures (SOP) for Grievance Redress Mechanism (GRM)

1. Introduction

This SOP outlines the processes, roles, responsibilities, and timelines for the Grievance Redress Mechanism (GRM) to ensure timely and effective resolution of grievances.

2. Scope

These procedures apply to all employees, IPs and contractors involved in the SSPDSS project.

3. Grievance Redress Mechanism (GRM) Process for LMP

3.1. Submission of Grievance

- Action: Grievances can be submitted through various channels including:
 - In-person submission of Complaint Form
 - Email
 - By post- To the Project Office
 - Via Telephone
 - Online grievance submission portal

Timeline: Grievances can be submitted at any time.

Responsible Party: Aggrieved individual or group.

3.2. Acknowledgment of Grievance

- Action: Acknowledge receipt of the grievance.
- Timeline: Within 2 working days of receiving the grievance.
- Responsible Party: Grievance Officer/Designated Officer.

3.3. Registration and Documentation

- Action: Register the grievance in the Grievance Register, assigning a unique identification number, and document all details.
- Timeline: Within 2 working days of acknowledgment.
- Responsible Party: Grievance Officer/Designated Officer.

3.4. Initial Assessment and Categorization

- Action: Conduct an initial assessment to categorize the grievance based on severity and complexity.
- Categories:
 - Category A: Minor issues that can be resolved quickly.
 - Category B: Moderate issues requiring investigation and coordination with multiple departments.
 - Category C: Major issues with significant implications, requiring a thorough investigation and higher-level intervention.
- Timeline: Within 3 working days of registration.
- Responsible Party: Grievance Officer/Designated Officer.

3.5. Investigation

- Action: Conduct a thorough investigation, including interviews, document review, and site visits if necessary.
- Timeline:
 - Category A: 5 working days.

- Category B: 10 working days.
- Category C: 15 working days.

- Responsible Party: Grievance Officer/Designated Officer, with support from admin/HR departments.

3.6. Resolution

- Action: Develop a resolution plan based on the findings of the investigation.
- Timeline: Within 3 working days after the investigation is completed.
- Responsible Party: Grievance Officer/Designated Officer, in consultation with relevant departments.

3.7. Communication of Resolution

- Action: Communicate the resolution to the aggrieved party in writing.
- Timeline: Within 2 working days of developing the resolution plan.
- Responsible Party: Grievance Officer/Designated Officer.

3.8. Implementation of Resolution

- Action: Implement the agreed-upon resolution and take necessary corrective actions.
- Timeline: As per the resolution plan.
- Responsible Party: Relevant departments, monitored by Grievance Officer/Designated Officer.

3.9. Follow-Up and Closure

- Action: Follow up with the aggrieved party to ensure satisfaction with the resolution. Close the grievance if the issue is resolved.
- Timeline: Follow-up within 5 working days of implementing the resolution.
- Responsible Party: Grievance Officer/Designated Officer.

3.10. Appeal Process

- Action: If the aggrieved party is not satisfied with the resolution, they can appeal to the Project Director.
- Timeline: Appeal must be submitted within 10 working days of receiving the resolution.
- Responsible Party: Aggrieved Party and Project Director.

3.11. Review of Appeal

- Action: Review the appeal, re-evaluate the investigation, and provide a final decision.
- Timeline: Within 10 working days of receiving the appeal.
- Responsible Party: Project Director.

4. Coordination Framework

4.1. Roles and Responsibilities

Grievance Officer/Designated Officer:

- Oversee the grievance redress process.
- Ensure timely acknowledgment, registration, and investigation of grievances.
- Maintain the Grievance Register and documentation.
- Communicate resolutions and monitor implementation.

Relevant Departments:

- Support the investigation and resolution of grievances.
- Implement corrective actions as per the resolution plan.

Project Director:

- Review appeals and provide final decisions.

- Ensure fair and transparent resolution of grievances.

4.2. Communication and Reporting

- Regular Meetings: Quarterly meetings to review grievance trends and discuss systemic issues.
- Reporting: Grievance Officer/Designated Officer to prepare quarterly reports on grievances received, processed, and resolved.
- Feedback Mechanism: Collect feedback from employees, stakeholders, and beneficiaries on the GRM process.

4.3. Training and Awareness

- Training Sessions: Regular training for employees on the GRM procedures.
- Awareness Campaigns: Periodic awareness campaigns to inform stakeholders about the GRM and how to lodge grievances.

4.4. Monitoring and Evaluation

- Regular Monitoring: Conduct regular monitoring of the GRM process to ensure compliance and effectiveness.
- Performance Metrics: Establish metrics to evaluate the efficiency and effectiveness of the GRM.
- Continuous Improvement: Use feedback and monitoring results to continuously improve the GRM process.

By implementing these SOPs, timelines, and coordination frameworks, the SSPDS, IPs and contracts can ensure an effective and transparent Grievance Redress Mechanism (GRM) that addresses the concerns of all employees promptly and fairly.

Annex V (a): Individual Grievance Complaint Form

1. Personal Information

- **Name:** _____
- **Position/Title:** _____
- **Department/Section:** _____
- **Contact Information (Phone/Email):** _____

2. Details of the Grievance

- **Date of Incident:** _____
- **Location of Incident:** _____
- **Description of Grievance:** (Please provide a detailed description of the incident or issue, including any relevant dates, times, and names of individuals involved. Attach additional sheets if necessary. Ensure the description relates to labor management procedures, conflict with supervisors, workplace issues, OSH, issues relating to wages, delay in payment of wage, unauthorized deduction from wages, confrontation with the co-workers, non-compliance of LMP, social difference between workers, workplace conditions, or employment practices.)

3. Evidence

- **Supporting Documents (if any):** (Please list and attach any documents, emails, or other evidence that support your grievance. This can include workplace policies, communication records, or other relevant documentation.)

4. Attempts at Informal Resolution

- **Have you attempted to resolve this grievance informally? (Yes/No)**
 - If Yes, please provide details of the informal resolution attempts: (Include the names of individuals approached, dates, and outcomes of these attempts.)

5. Desired Resolution

- **What outcome or resolution are you seeking? (Specify the actions or changes you believe are necessary to address the grievance effectively.)**

6. Declaration

- **I declare that the information provided in this form is true and accurate to the best of my knowledge.**
 - **Signature:** _____
 - **Date:** _____

Submission Instructions

Please submit this completed form to the Grievance Officer/Designated Officer. in person or via email at complaints@sspa.gos.pk You will receive an acknowledgment of your submission within 2 working days.

Annex V (b): Collective Grievance Complaint Form

1. Group Information

- **Representative Name:** _____
- **Position/Title:** _____
- **Department/Section:** _____
- **Contact Information (Phone/Email):** _____

2. List of Group Members (Attach an additional sheet if necessary)

- **Name:** _____
 - Position/Title: _____
 - Signature: _____
- **Name:** _____
 - Position/Title: _____
 - Signature: _____
- **Name:** _____
 - Position/Title: _____
 - Signature: _____

3. Details of the Grievance

- **Date of Incident:** _____
- **Location of Incident:** _____
- **Description of Grievance:** (Please provide a detailed description of the incident or issue, including any relevant dates, times, and names of individuals involved. Attach additional sheets if necessary. Ensure the description relates to labor management procedures, conflict with supervisors, workplace issues, OSH, issues relating to wages, delay in payment of wage, unauthorized deduction from wages, confrontation with the co-workers, non-compliance of LMP, social difference between workers, workplace conditions, or employment practices.)

4. Evidence

- **Supporting Documents (if any):** (Please list and attach any documents, emails, or other evidence that support your grievance. This can include workplace policies, communication records, or other relevant documentation.)

5. Attempts at Informal Resolution

- **Have you attempted to resolve this grievance informally? (Yes/No)**
 - If Yes, please provide details of the informal resolution attempts: (Include the names of individuals approached, dates, and outcomes of these attempts.)

6. Desired Resolution

- What outcome or resolution are you seeking? (Specify the actions or changes you believe are necessary to address the grievance effectively.)

7. Declaration

- We declare that the information provided in this form is true and accurate to the best of our knowledge.
 - Representative Signature: _____
 - Date: _____

Submission Instructions

Please submit this completed form to the Grievance Officer/Designated Officer. in person or via email. complaints@sspa.gos.pk You will receive an acknowledgment of your submission within 2 working days.