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# Labor Management Procedures

## Karachi Water & Sewerage Services Improvement Project Series Of Projects - II



## **Executive Summary**

The Government of Sindh (GoS) through the Karachi Water & Sewerage Board (KWSB) intends to receive a loan from the World Bank (WB) for the implementation of the Karachi Water & Sewerage Services Project (KWSSIP). As per World Bank requirements, the KWSB has prepared these Labor Management Procedures (LMP) to highlight the requirements regarding labor and working conditions which will be applicable to the proposed project.

The document aims to guide the management and control of activities that may pose labor-related risks during the project implementation. The LMP is a mandatory requirement applicable to all types of workers that will be employed by KWSB including its consultants, contractors, sub-contractors, and labor supply contracting agencies, third parties, and all personnel related to the execution of the project.

## **Project Overview**

The KWSB was established in 1981 by promulgating the Sindh Local Government (amendment) Ordinance of February 1983 leading to its creation within the Karachi Metropolitan Corporation (KMC). It is a service-based and consumer-oriented organization responsible for production, transmission and distribution, cost recovery of potable water to the citizen of Karachi, managing sewerage system within the city to ensure hygienic environment, development of scheme to cover short falls in services and collection of revenues for sustained economic viability.

There are four prominent, officially declared, and legal water sources for the city of Karachi. Out of which three sources are surface water sources which include; Lake Haleji, Lake Keenjhar and Hub Dam. Fourth water resource is categorized as groundwater source; the Dumlottee wells. City of Karachi has an allocated quota of 650 Million Gallons per Day (MGD) water from Keenjhar Lake and Hub Dam against a demand of 1,200 MGD. Water is collected and treated by the conventional water treatment plants and distributed by a system which is at least 40-45 years old with some new distribution facilities in the city. Approximately 210 MGD of water is supplied without treatment<sup>1</sup>. River Indus feeds water to the Lake Keenjhar. From Keenjhar, water through conduits goes to Haleji, Gharo, Port Qasim, Steel Mills and to Dhabeji Pumping Station. From Dhabeji Pumping Station, water is pumped to different pumping stations to supply water among all districts of the city by using electrical pumping motors.

There is a huge unmet demand for water (550 MGD current capacity versus an estimated demand of 1200 MGD); a high non-revenue water percentage (50-60 percent); very large financial losses (estimated at Pak Rupees (PKR) 569 million/ United States Dollar (US\$) 5.4 million per month); and significant outstanding arrears (estimated at PKR 32 billion/US\$305 million). Most of KWSB's 1.1 million customers get water through the piped network on an irregular basis, and some just 2-4 hours every other day. There is currently no sewage treatment, as the city's treatment facilities are dilapidated and not working, resulting in an estimated 475 MGD of sewage being discharged into the Arabian Sea via the storm water network.

To address the above-described water supply and sewerage issues in Karachi, following Series of Projects (SOPs) have been conceived under KWSSIP:

SOP-1 (KWSSIP-1)	Focuses on reforms, maintenance, and rehabilitation
SOP-2 (KWSSIP-2)	Scaling up of Investments
SOP-3	Will focus on increasing water production and financing investments to ensure the treatment of the additional wastewater

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<sup>1</sup> *Situational Analysis of Water Resources of Karachi, WWF 2019*

	that will be generated
SOP-4	Will focus on improving services in informal settlements based on experience gained under the previous projects

Currently SOP-1 is under implementation while SOP-2 is under the preparation stage. SOP-2 or KWSSIP-2 has three components: (i) capacity building and reform measures; (ii) infrastructure investments; and (iii) project management and associated studies. Following are the sub-projects included under Component 2 of proposed project:

- K-IV Augmentation (connection of K-IV water treatment plants to the network);
- Malir basin wastewater interceptors and treatment plant;
- Improving water supply and sewerage in additional low-income communities (katchi abadis);
- Priority sewer network rehabilitation and extension and rehabilitation of wastewater pumping stations;
- Priority water network rehabilitation and extension including meters and to reduce Non-Revenue Water (NRW) and additional chlorination facilities to improve the water quality;
- Reducing energy consumption; and
- Rehabilitation of existing and construction of new filtration plants to assure treatment of all water currently produced.

## Overview of Labor Use in the Project

The implementation of the Project will involve different categories of workers for different activities associated with the project. Project workers are divided into the following four categories under the WB Environment and Social Standard 2 (ESS2): (i) direct workers; (ii) contractual workers; (iii) primary supply workers; and (iv) community workers. The first three worker categories - contracted workers, primary supplier workers, and direct workers - apply to this project based on this classification and the labor requirements of the project, however their individual numbers are not entirely known yet. The project is not envisaged to have community workers, where KWSB and its contractors will source goods or materials from primary suppliers required for the core functions of the project.

## Assessment of Key Potential Labor Risks

The main labor risks associated with the project are assessed to be related to risk of:

- Occupational health and safety (OHS) risks,
- Child and forced labor,
- Labor influx,
- Labor Disputes over Terms and Conditions of Employment,
- Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH),
- Risk from communicable disease,
- Risk from unsafe potable water,
- Lack of provision of basic facilities – water, food, toilets, washing hand facilities, medical aid,
- Unfair recruitment and selection practices which could discriminate against women, vulnerable groups,
- Poor work safety culture, accidents/incidents, Lack of provision of PPE,
- Salary, wages, and benefits are not in labor laws followed,
- Sub-standard campsite facilities and campsite management,
- Lack of unified rules and regulations for all workers,

- Lack of proper grievance redress channel for workers.

The activities involved in construction and operation work of the project will be primarily responsible for the health and safety risks that could affect the project's workforce, including PIU, consultants, and construction workers. The typical risks include being exposed to the physical dangers of using construction equipment, working near moving traffic, operating cranes, and hoisting equipment, working on or near scaffolding, tripping, and falling, handling bitumen, burns, being exposed to noise and dust, falling objects, traffic risks from operating project-related vehicles, exposure to hazardous materials, and exposure to electrical risks from using tools and machinery. Furthermore, the locations where these works are to happen also pose occupational health and safety hazards as these are areas dealing with hazardous wastes and chemicals, e.g., wastewater treatment plants, filtration plants.

To reduce the risks to the health and safety of employees, it is crucial to identify hazards and manage associated risks. Additionally, it is projected that taking a proactive approach to risk management will lead to significant cost savings, a decrease in compensation claims, and a reduction in noncompliance with health and safety laws, with overall safer and better working conditions for all involved.

Labor related risks will be minimized by adhering to the mitigation hierarchy, which dictates:

- I. Hazard Elimination
- II. Substitution of process, substance, or tools
- III. Prevention of contact with risky object i.e., create barriers, install guards, etc.
- IV. Implementation of safe system of work such as permit to work systems, fixing of time limits on hazardous activities performance
- V. Use of appropriate personal protective equipment (PPE)

To ensure a safe and healthy workplace, the PIU along with its consultants and contractors will take reasonable care to identify all foreseeable health and safety hazards, which hold the potential to harm employees. Hazards may arise from the work process, the equipment and materials in use, the work environment, or other people involved.

The project and all associated workers will follow occupational health and safety regulations. All contractors must include a comprehensive description of their occupational health and safety management strategy with their bids. One of the factors the PIU will consider when choosing the contractors is the applicability of these safety provisions and their previous track record in doing so. All contractors must make sure that workers wear personal protective equipment (PPE), get safety training, and take other preventative measures as specified in the WB OHS Guidelines and in a setting that complies with ESS2 criteria. Both the company and the employee are accountable for safety, where they must work together to create and implement an OHS programme as well as safe work practices and procedures.

## **Overview of Labor Legislation**

There are numerous labor regulations in Sindh and Pakistan. These labor laws apply to a wide range of industrial, commercial, and labor institutions, and they include a number of ordinances, acts, rules and regulations, and other statutes. Sindh is required to comply with a number of national and international legal obligations in terms of labor rights. The following is a list of the most important legislation pertaining to welfare and labor rights.

- National
  - Factories Act, 1934
  - Industrial Relation Act
  - Workman Compensation Act 1923

- Minimum Wages Ordinance, 1961
  - Payment of Wages Act 1936
  - Industrial & Commercial Employment Standing Orders Ordinance 1968
  - Maternity Benefits Ordinance 1958
  - Apprenticeship Ordinance 1962
  - Employees Old Age Benefit Act 1976
  - Employments of Children Act 1991
  - Bonded Labor Abolition Act 1992
  - Workers Welfare Act 1971
  - Minimum Wages (unskilled workers), Amendment 2015
  - The Disabled Persons (Employment and Rehabilitation) Act 2015
  - The Protection Against Harassment of Women at the Workplace Act, 2010
  - Transgender Act 2018
- Provincial
    - Pakistan Labor Policy, 2010
    - The Sindh Workers Compensation Act 2015
    - The Sindh Minimum Wages Act 2015
    - The Sindh Terms of Employment (Standing Orders) Act , 2015
    - The Sindh Payment of Wages Act 2015
    - Sindh Bonded Labor (Abolition) Act 2015
    - Sindh Factories Act, 2015
    - The Sindh Prohibition of Employment of Children Act 2017
    - Sindh Occupational Health and Safety Act
    - Protection against Harassment of Women at the Workplace Act (Amendment) 2022
    - Sindh Prohibition of Child Employment Act 2017
    - Sindh Differently Abled Persons (Employment, Rehabilitation and Welfare) Act 2017
    - Sindh Labor Policy 2018
    - The Sindh Employees' Social Security Act, 2016

The Sindh Occupational Health and Safety Act 2017 is the applicable local legislation as this Act applies to all Workplaces in Sindh province, where organizations need to formulate OHS Policies which is the requirement of the Act. The contractors and suppliers shall comply with the provisions of the Act.

In 2010, subjects of labor and employment were devolved to provinces under the 18<sup>th</sup> Amendment to the Constitution of Pakistan, as a result of which the federal labor laws became applicable on provinces under Article 270 AA (6) of the Constitution of Pakistan. The 18<sup>th</sup> Constitutional Amendment in Pakistan has altered the landscape of the labor administration system in the country. Provinces now have a greater responsibility and resources in terms of legislation and implementation. Each province has developed its own labor policy to protect worker's rights. The policy relevant to the KWSSIP project is the Sindh Labor Policy, 2018. This policy incorporates the key thematic areas with primary focus on the effective implementation of labor standards, improvements in workplace safety, living wages, child/bonded labor, awareness raising, excellence in labor inspections regime.

The government of Pakistan has also ratified 36 ILO Conventions, including eight fundamental conventions as of now. In the South Asia region, Pakistan is the second country that has ratified all eight fundamental conventions as enshrined in the ILO Declaration on Fundamental Principles and Rights at Work. The ILO works in close collaboration with its tripartite constituents towards achieving Pakistan's decent work objectives.

The ILO Governing Body has identified eight “fundamental” Conventions, covering subjects that are considered to be fundamental principles and rights at work, which are listed below:

- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- Forced Labor Convention, 1930 (No. 29) (and its 2014 protocol)
- Abolition of Forced Labor Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labor Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

## **Responsible Staff**

**KWSSIP / Project Implementation Unit (PIU) Responsibility:** The PIU of KWSSIP is in charge of the overall management of the Project and the LMP's implementation. The LMP must be followed throughout the procurement process. Contractor(s) and subcontractor(s) must be hired transparently based on their experience and competency.

**Supervision Consultant's Responsibilities:** The supervision consultants will oversee activities of the contractors in their implementation of the designs proposed under the various sub-projects, compliance of civil works with defined guidelines, and implementation of the Environmental & Social Management Plans. Their purview will also include the implementation and supervision of occupational health and safety measures along with labor working conditions.

**Contractors' Responsibilities:** To ensure that all LMP requirements are met, the contractor(s) must appoint a Labor and OHS representative (s). The contractor must provide the PIU with a monthly report on all incidents. The contractor is responsible for teaching/training employees how to use personal protective equipment and safety precautions. Contractors must keep records in accordance with the procedures outlined in this LMP. PIU may request records at any time to ensure that labor laws are followed. The PIU will compare records to actuals at least once a month and, if necessary, may order immediate corrective action. The Project staff will continue to have access to the KWSB's current grievance procedures. Contractors will be required to set up a grievance redress system for employees that meets the LMP's minimum requirements. Every month, the PIU's social development specialist will go over all records. Each contractor's vehicle must be manned at all times by a certified safety officer. The contractor must provide any necessary instructions. The contractor's employees will be directed by the safety officer.

## **Policies and Procedures**

All project staff and contractors must be informed of the project management policies and processes (s). Contracts must be drafted in conformity with Environmental and Social Standard (ESS) 2 principles and Sindh Labor Laws, and all recruitment processes must be transparent. All signs prepared must be in Sindhi or Urdu languages to the greatest extent practicable.

As part of the conformance to labor laws and procedures, the projects team will draft the following procedures for implementation:

- Reporting and Investigation of Incidents /Illnesses
- Procedure for Waste Management
- Procedure for Housekeeping

- Procedure for Hazard Identification and Risk Assessment
- Training Procedure including Induction training
- Toolbox Talks
- Safe Systems of Work – work at heights, hot work, electrical High Tension/ Low Tension (HT/LT) works, Excavation, Confined Spaces (Permits to Work)
- Personal Protective Equipment
- Emergency Response Procedure
- Monthly reporting procedure
- Camp management procedure
- Management of Food and Drinking Water at Campsite(s) and at construction site
- Project Site Security Procedure
- COVID 19 measures procedure
- Internal Auditing Procedure
- Management of visits by WB /AIIB, Government agencies
- Storage of fuel, hazardous substances
- Operation and maintenance of heavy equipment and overhead cranes
- Child Labor Avoidance Procedures
- SEA/SV Prevention Procedures.

## **Age of Employment**

According to the International Finance Corporation (IFC) Guidance Note 2 and the Sindh Prohibition of Employment of Children Act of 2017, no one under the age of 18 may be hired to work at the project site(s). The hiring process must specify how candidates' Computerized National Identity Cards (CNICs) will be checked, so that no one under the age of 18 can be hired on site. It is necessary to inspect and confirm the applicant's original CNIC also.

The Sindh Prohibition of Employment of Children Act of 2017 states that any teenage worker (aged between 14 and 18) hired for training at the site(s) must be kept away from technical equipment and not given any heavy tasks.

## **Terms and Conditions of Employment**

The employment terms and conditions applying to project employees as set out in the labor rules will apply to all project employees who are assigned to work on the Project (direct workers). Terms and conditions of part time direct workers are determined by their individual contracts. KWSB is committed to providing equal opportunities for all its employees and potential employees where everyone is treated with respect and dignity and where there is equal opportunity for all. The normal hours of work of project workers shall not exceed more than 8 hours a day for 5 days a week, or a 40-hour work week, exclusive of time for meals.

Every project worker is entitled to a 2-day rest day period during weekends (Saturday and Sunday). Workers shall also be entitled to a rest day on regular holidays recognized by the province. Under the Maternity and Benefits Ordinance 1958, leave is granted to pregnant women for a period of 12 weeks with full pay. It is unlawful for an employer to dismiss a woman worker on maternity leave.

Provincial governments constitute Minimum Wages Boards under Section (3) of the Minimum Wages Ordinance, 1961 to decide the wage rates which are revised annually. The workers welfare legislation includes Employees Old Age Benefits 1976 (with provisions for old age pension, old age grant, invalidity, and widow(er) pension). For contract termination, a notice of one month must be served before severing the employment relationship or payment of one

month's wages in lieu of notice may be provided. The law also obliges the employer to provide the termination certificate in writing stating the reason behind it. Any injury, illness or accident sustained by the worker during the work period shall be conveyed to the nearest clinic or hospital by the hiring authority or its representative. Collective bargaining has also been called a fundamental right for the workers to be part of trade unions.

### **Workers' Grievance Redress Mechanism**

Pursuant to Article 46 of the Industrial Relations Ordinance (IRO) 2002, a worker may bring his or her grievance in respect of any right guaranteed or secured by or under any law. PIU will establish a GRM (or make provisions in the overall GRM) for the project workers to address labor or workplace-related concerns consistent with the applicable national and provincial laws and ESS2 before the Project Effectiveness. The workers' GRM will be based on the requirements of the WB's ESS2 – Labor and Working Conditions. The E&S Specialists of PIU will monitor the recording and settlement of grievances by workers and report to the PIU in its monthly progress reports. The process will be followed by the GRM focal point, the E&S specialists who will be responsible for the GRM of the Project. All concerned responsible staff shall hold regular meetings with the project workers to discuss any work-related issues and concerns. Every grievance raised by a worker will be documented with the actions undertaken by the PIU and contractors to address such grievance.

### **Contract Management**

The PIU will make sure that the contractors are trustworthy and legal businesses with established labor management practices that adhere to this LMP. A clause requiring contractors to abide by current OHS, labor, and worker protection laws will be included in all contracts with them. PIU will stay updated on how contractors perform in regard to hired help, paying particular attention to how well they adhere to their written contracts.

### **Community Workers**

Community workers are not envisaged under this project.

### **Primary Supply Workers**

The construction work under the Project will require the involvement of primary supplies to provide construction materials essential for carrying out the proposed works. The PIU and the consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment. PIU will oversee the procurements of goods and materials requirements under the construction works. Project Contractors will be responsible for procurement and supply of materials and equipment under the same conditions, and specifications on OHS aspects in their contracting agreements. When sourcing for primary suppliers, the project will require such suppliers to identify the risk of child labor/forced labor and serious safety risks. The PIU and the consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment. Where appropriate, the Project will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers.

### **List of Abbreviations**

<b>AIIB</b>	Asian Infrastructure Investment Bank
<b>BMPs</b>	Best Management Practices
<b>CNIC</b>	Computerized National Identity Card
<b>COVID-19</b>	Corona Virus Disease 2019
<b>EHS</b>	Environmental Health & Safety
<b>EMC</b>	Environmental Management Consultant
<b>EPC</b>	Engineering, Procurement and Construction
<b>ESF</b>	Environmental and Social Framework
<b>ESMF</b>	Environmental and Social Management Framework
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESMS</b>	Environmental and Social Management System
<b>ESS</b>	Environmental & Social Safeguard
<b>GTS</b>	Garbage Transfer Station
<b>HT</b>	High Tension Lines
<b>IA</b>	Implementing Agency
<b>ILO</b>	International Labor Organization
<b>K-Electric</b>	Karachi Electric
<b>KMC</b>	Karachi Metropolitan Corporation
<b>KWSB</b>	Karachi Water and Sewerage Board
<b>KWSSIP</b>	Karachi Water and Sewerage Services Improvement Project
<b>LMP</b>	Labor Management Procedures
<b>LT</b>	Low Tension Lines
<b>NCOC</b>	National Command and Operation Center
<b>NESPAK</b>	National Engineering Services Pakistan
<b>NFPA</b>	National Fire Protection Association
<b>OSH</b>	Occupational, Safety and Health
<b>PPE</b>	Personal Protective Equipment
<b>SARS-CoV-2</b>	Severe Acute Respiratory Syndrome Coronavirus 2
<b>SEPA</b>	Sindh Environmental Protection Agency
<b>SOP</b>	Standard Operating Procedure
<b>UN</b>	United Nations
<b>VPP</b>	Voluntary Protection Program
<b>WB</b>	World Bank

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## **1. INTRODUCTION**

The Government of Sindh (GoS) through the Karachi Water & Sewerage Board (KWSB) as the implementing Agency (IA), intends to receive a loan from the World Bank (WB) for the implementation of the Karachi Water & Sewerage Services Improvement Project (KWSSIP). In compliance with World Bank requirements, the IA has prepared these Labor Management Procedures (LMP) to discuss the requirements with regard to labor and working conditions applicable to the proposed project. It aims to guide the management and execution of activities that may induce labor related risks during the implementation of the project.

The LMP serves to direct management and control of actions that can bring labor-related hazards while the project is being implemented. The LMP is a requirement that must be met by all employees of the Implementing Agency (IA), which is the Karachi Water & Sewerage Board (KWSB), as well as all of its consultants, contractors, subcontractors, labor supply contracting agencies, third parties, and other staff involved in the project's execution.

This document has been prepared for the approval of the World Bank.

### **1.1 LMP Objectives**

The objectives of this LMP are to:

- Develop and disseminate commonly recognized labor policies so that participants in the KWSSIP will have a point of reference;
- Ensure that all KWSSIP participants, whether direct workers or not, abide by employment legislation by creating the necessary working circumstances that are compliant with applicable legislative requirements;
- Assist and guide KWSB employees who will work on the project in carrying out labor management procedures;
- Encourage just and equitable labor practices to ensure equal opportunity, non-discrimination, and fair treatment for both male and female employees;
- Create, nurture, and oversee a positive management-employee relationship;
- Protect project workers, especially those who are at risk, such as women and people with disabilities, children (of working age, in accordance with the WB Environmental and Social Standard 2 - ESS2<sup>2</sup>) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
- Give project participants and workers easy access to ways to voice their complaints about the workplace.

The LMP's description of the key labor requirements and risks associated with KWSSIP would help KWSB determine the resources needed to resolve labor difficulties. The LMP is a dynamic document that is initiated early in the planning stage of the project and is evaluated and updated as the project is developed and carried out. As a result, this document defines the types of personnel and their management that the Project is expected to use. Important LMP components will be included in the contractual obligations of contractors and subcontractors. All contractors and subcontractors shall prepare and implement labor management plans in line with the LMP.

KWSB has prepared this document and its annexes based on the existing labor laws in Pakistan and its ratified international agreements, and in accordance with the guidelines of the ESS2 of the World Bank. Furthermore, the scope and procedures of the LMP, its annexes, constitute a special labor framework, against which compliance is mandatory for KWSB and

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<sup>2</sup> World Bank. 2017. "World Bank Environmental and Social Framework." World Bank, Washington, DC

its consultants, contractors, subcontractors, and suppliers associated with this project. The LMP will be applicable to all types of workers that will be employed by KWSB and all personnel employed by the Board in relation to the execution of the project; and therefore, its use and knowledge is mandatory, as necessary.

## **1.2 Scope of the LMP Application**

The LMP is required by the World Bank's Environmental and Social Framework (ESF) and its ESS2 on 'Labor and Working Conditions.' Its scope encompasses:

- Labor and contracts;
- Management of workers;
- Occupational Health and Safety; and
- Access of information and grievance mechanisms.

The main objective of ESS2 is to promote constructive worker-management engagement and provide benefits for project development by treating project personnel fairly and giving them safe and healthy working circumstances. The goal of this LMP is to make project planning and execution easier by identifying the major personnel requirements and the environmental and social (E&S) actions needed to manage labor-related project challenges. Along with fundamental guidelines that apply to all forms of work, the LMP also addresses problems and issues unique to the Project. No matter how they are hired or whatever labor policy they fall under, as described below, the LMP is applicable to all workers employed by the Project as specified in ESS2.

- Direct Workers: People employed or engaged directly by the KWSB to work specifically in relation to the Project;
- Contracted Workers: People employed or engaged through third parties to perform work related to core functions of the project, regardless of location;
- Primary Supply Workers: People employed or engaged by the KWSB and its contractors' primary suppliers.

## **1.3 Project Overview**

The KWSB was established in 1981 by promulgating the Sindh Local Government (amendment) Ordinance of February 1983 leading to its creation within the Karachi Metropolitan Corporation (KMC). It is a service-based and consumer-oriented organization responsible for production, transmission and distribution, cost recovery of potable water to the citizen of Karachi, managing sewerage system within the city to ensure hygienic environment, development of scheme to cover short falls in services and collection of revenues for sustained economic viability.

There are four prominent, officially declared, and legal water sources for the city of Karachi. Out of which three sources are surface water sources which include; Lake Haleji, Lake Keenjhar and Hub Dam. Fourth water resource is categorized as groundwater source; the Dumlottee wells. City of Karachi has an allocated quota of 650 Million Gallons per Day (MGD) water from Keenjhar Lake and Hub Dam against a demand of 1,200 MGD. Water is collected and treated by the conventional water treatment plants and distributed by a system which is at least 40-45 years old with some new distribution facilities in the city. Approximately 210 MGD of water is supplied without treatment<sup>3</sup>. River Indus feeds water to the Lake Keenjhar. From Keenjhar, water through conduits goes to Haleji, Gharo, Port Qasim, Steel Mills and to Dhabeji Pumping Station. From Dhabeji Pumping Station, water is pumped to different pumping stations to supply water among all districts of the city by using electrical pumping

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<sup>3</sup> *Situational Analysis of Water Resources of Karachi, WWF 2019*

motors.

There is a huge unmet demand for water (550 MGD current capacity versus an estimated demand of 1200 MGD); a high non-revenue water percentage (50-60 percent); very large financial losses (estimated at Pak Rupees (PKR) 569 million/ United States Dollar (US\$) 5.4 million per month); and significant outstanding arrears (estimated at PRK 32 billion/US\$305 million). Most of KWSSB's 1.1 million customers get water through the piped network on an irregular basis, and some just 2-4 hours every other day. There is currently no sewage treatment, as the city's treatment facilities are dilapidated and not working, resulting in an estimated 475 MGD of sewage being discharged into the Arabian Sea via the storm water network.

To address the above-described water supply and sewerage issues in Karachi, following Series of Projects (SOPs) have been conceived under KWSSIP:

SOP-1 (KWSSIP-1)	Focuses on reforms, maintenance, and rehabilitation
SOP-2 (KWSSIP-2)	Scaling up of Investments
SOP-3	Will focus on increasing water production and financing investments to ensure the treatment of the additional wastewater that will be generated
SOP-4	Will focus on improving services in informal settlements based on experience gained under the previous projects

Currently SOP-1 is under implementation while SOP-2 is under the preparation stage. SOP-2 or KWSSIP-2 has three components: (i) capacity building and reform measures; (ii) infrastructure investments; and (iii) project management and associated studies. Following are the sub-projects included under Component 2 of proposed project:

- K-IV Augmentation (connection of K-IV water treatment plants to the network);
- Malir basin wastewater interceptors and treatment plant;
- Improving water supply and sewerage in additional low-income communities (katchi abadis);
- Priority sewer network rehabilitation and extension and rehabilitation of wastewater pumping stations;
- Priority water network rehabilitation and extension including meters and to reduce Non-Revenue Water (NRW) and additional chlorination facilities to improve the water quality;
- Reducing energy consumption; and
- Rehabilitation of existing and construction of new filtration plants to assure treatment of all water currently produced.

The Environmental and Social Assessments for all these projects are currently underway, where the specific impacts and mechanisms regarding labor commissioned for the project, will be discussed in the enclosed report.

## **2. OVERVIEW OF LABOR USE ON THE PROJECT**

These Labor Management Procedures apply to all Project workers whether direct, contracted, primary supply and community workers as per ESS-2.

The proposed KWSSIP-2 will involve direct workers (IA employees transferred to the PIU, specialists engaged from the market, etc.); contracted workers engaged in construction work and consultancy services for the project (e.g., for preparation of E&S documents); and primary supply workers (e.g., for equipment required for the project).

The LMP has been developed to manage labor risks during the implementation of the KWSSIP-2. The LMP is in line with national requirements as well as the objectives of the World Bank's ESF, specifically objectives of Environmental and Social Standard 2: Labor and Working Conditions (ESS2).

### **2.1 Labor Requirement**

ESS 2 divides workers into four categories: direct workers, contracted workers, community workers, and primary supply workers that involves all Project workers. At this stage, community workers are not anticipated for KWSSIP. The workers are further categorized as follows:

**1. Direct workers<sup>4</sup>:** Direct employees of KWSSIP are individuals who are hired by the KWSB to perform work that is explicitly related to the Project. For the purpose of carrying out a variety of project operations, direct workers will include the project-based staff and the permanent staff of the Project Implementation Unit (PIU). The Project Director (PD) will serve as the PIU's leader, and it will consist of multiple senior and junior engineers qualified in civil engineering. Additionally, the PIU will include experts in financial, procurement, environmental, and social management. As part of the PIU, KWSB may additionally hire consultants and support personnel who will be paid on a contract basis. The national and provincial labor regulations will serve as the basis for these consultants' terms and conditions. The KWSSIP may employ consultants to carry out as many short-term tasks as are required. Any civil officials who are seconded to assist with project implementation must adhere to the occupational health and safety criteria outlined in this LMP.

The PIU will be tasked with:

- General project responsibilities for project management, financial management, procurement, monitoring and evaluation, and environmental and safety management;
- Technical responsibilities to help divisions working on the project; and
- Support services (office manager, assistants, driver, others).

PIU staff may be transferred from within KWSB, hired or seconded for the implementation of KWSSIP including technical and non-technical staff.

**2. Contracted Workers:** For the purpose of carrying out document preparation and carrying out various civil works under the Project, KWSB will hire a number of contractors and consultants. Contractors, subcontractors, and their employees who are employed by KWSSIP may include consultants who are preparing the feasibility studies and detail design for the

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<sup>4</sup> A "direct worker" is a worker with whom the project has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. Where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.

project as well as consultants for environmental and social assessment studies. Both expert and unskilled labor will be employed by civil work contractors. Below is a description of the various categories of project contracted employees:

**2.1 Permanent / Skilled staff of contractors (construction company):** Project managers, site engineers, construction foremen, supervisors, environmental, social, health, and safety (ESHS) officers, as well as administrative and financial officers for the project/subprojects will all be involved in the KWSSIP.

**2.2 Skilled workers engaged by sub-contractors:** Contractors will mobilize their relevant workers and subcontractors to meet project needs based on the expertise needed for each type of project operations. Welders, fitters, steel workers, electricians, technicians, drivers, and operators of large machinery are just a few examples of the specialized workers. It would be expected of the staff to possess knowledge pertinent to the needed tasks.

**2.3 Unskilled community members engaged by the contractor/subcontractors:** To reduce the number of migrant workers at construction sites, local labor will be hired to the extent possible as unskilled and skilled workers, particularly for simple tasks like building ancillary structures, levelling, and excavating land, loading and unloading materials, supporting construction workers, cleaning up construction sites, watering work sites, and watchmen. The contractor will be legally obligated to engage with KWSB /PIU to prioritize the impacted communities and vulnerable groups, including female workers and labors with disabilities at their request, in order to ensure equal chances in employment.

**2.4 Project Management and Supervision Support:** Design and Supervision Consultants (DSC) with the necessary experience will be hired by KWSB to perform the following tasks: supporting the PIU in the selection of the contractor(s), developing designs, project management, construction supervision, and contract management. Additionally, DSC will help PIU monitor the contractor(s)' environmental and social performance as outlined in their environmental and social management plans, as well as their adherence to workplace health and safety regulations.

**2.5 Independent Monitoring Consultants (or Monitoring and Evaluation (M&E) Consultants):** PIU may hire independent monitoring consultants. Independent monitoring experts are in charge of ensuring adherence to approved project-related plans and programmes, including the environmental and social concerns. The independent monitoring consultants may be hired at the start of the implementation phase, and they will finish their job between six and a year after all project activities have been successfully finished.

**3. Community Workers:** The project will not have community workers as defined under ESS2.

**4. Primary Supply Workers:** Skilled and unskilled workers who will be associated with the primary suppliers for the project.

## **2.2 Number of Project Workers**

*Direct Workers:* Currently, KWSSIP has approximately 94 direct workers, where this number is expected to increase over time as more projects are introduced and implemented. The staff of the PIU as described in Section 2.1 comprises of, among others, the Project Director, several senior and junior engineers, procurement, financial management personnel, and E&S specialists. Direct workers carry out key functions such as project management, coordination, fiduciary, environmental and social management, monitoring and evaluation, and reporting. Currently, the number and type of experts approved for working under the PIU (as per the approved PC-I of the project) are as follows:

Table 2.1 - Direct Workers at the PIU under SOP-II

S. No.	Position	No. Of Staff Against Position
1.	Social Development Specialist	2
2.	OHS Specialist	1
3.	Environmental Specialist	2
4.	E&S Officers	4
5.	Monitoring & Evaluation Specialist	2
6.	Procurement & Contract Management Specialist	3
7.	Procurement Assistants	2
8.	Technical Specialist	3
9.	Technical Specialist Assistants	2
10.	Communication Specialist	1
11.	GIS Specialist	1
12.	Gender Specialist	1
13.	Gender Officer	1
14.	IT Specialist	1
15.	Financial Management Specialist	1
16.	Associate/ Junior Financial Management Specialist	3
17.	Administrative Officer	1
18.	Computer Operators	6
19.	Office Support Staff	10
20.	Contract Management Consultants	1

Where most of these positions have already been filled out in the PIU, with the rest also being filled out through hirings.

*Contracted Workers:* The number of laborers who will work on the project has been calculated and added to the Contracted Workers chapter ahead, where the estimated number for the supervisory consultants who will be required under each of the sub-projects is also given below:

Estimated number of staff and workforce required during construction phase <sup>5</sup>		
<i>Supervision Consultant's Staff</i>		
#	Project	Number of Staff
1	K-IV Augmentation Works	76
2	Improving Water Supply & Sewerage in Additional Low-Income Communities (Katchi Abadis)	65
3	Priority Sewer Network Rehabilitation and Extension and Rehabilitation of Wastewater Pumping Stations	41
4	Priority Water Network Rehabilitation and Extension including meters and DMAs to reduce NRW and Additional Chlorination Facilities to improve water quality	44
5	Reducing Energy Consumption	18
6	Rehabilitation and Construction of New Filtration Plants	19
7	Malir Basin Wastewater Interceptors and Treatment Plant (S-3 Phase 2)	Not Available

<sup>5</sup> Numbers taken from PC-I prepared for the documents

## **2.3 Workforce Characteristics**

The number of project workers required for the sub-projects falling under the project shall be identified by the Project design team in line with PIU of KWSSIP. However, given the nature of the project workforce (mostly semiskilled construction labor) and characteristics of the labor force market in Karachi and nearby project area, it is likely the workforce, especially the lower-skilled workers, will be mostly male.

There will, however, be females also available in the project areas to join in and contribute to the project. The expectation is that the majority of labor will be locally hired with the exception of a few skilled workers. Provisions will be made to train and hire as many as possible from local communities where the activities are taking place. Furthermore, professional business/capacity building companies might be contracted in order to carry out surveys, trainings, and other assessments within the project. The nature of labor force will be skilled workers/experts.

## **2.4 Timing of Labor Requirements**

**Direct Workers:** The direct personnel will typically be needed full-time and all year long when the project is being implemented. The year-round construction season can be a little longer or a little shorter depending on the weather. The contractor shall be responsible for organizing the labor force to fit the season and the type of job. Throughout the course of the project, additional experts and consultants will be retained as needed. However, it is apparent that they will be employed in accordance with the implementation of various sub-components for specified time slots. The timing for the engagement of contracted workers will be revealed at a later point.

**Contracted Worker:** The PIU will hire consultants and contractors who will hire people based on their degree of ability and sub-project requirements based on the scope of work included in KWSSIP. When the construction contracts are granted and the contractors produce their work plans, the specifics of the timing of the number of labor requirements, frequency, types of jobs, and length of the requirement will be decided. This LMP may need to be changed at that moment. The maximum number of hours worked per day should be 8, with at least one hour allotted for rest.

**Primary Supply Workers:** The project may require the use of primary supply workers. The primary supply worker provisions of ESS2 apply to those suppliers with whom the project will have a sufficiently significant and ongoing relationship.

### **3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS**

The primary risks that project operations provide to workers and other project staff are covered in this chapter. The main occupational risks are:

#### **3.1 Key Potential Labor Risks**

The main labor risks associated with the project are assessed to be related to risk of:

- Occupational health and safety (OHS) risks,
- Child and forced labor,
- Labor influx,
- Labor Disputes over Terms and Conditions of Employment,
- Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH),
- Risk from communicable disease,
- Risk from unsafe potable water,
- Lack of provision of basic facilities – water, food, toilets, washing hand facilities, medical aid,
- Unfair recruitment and selection practices which could discriminate against women, vulnerable groups,
- Poor work safety culture, accidents/incidents, Lack of provision of PPE,
- Salary, wages, and benefits are not in labor laws followed,
- Sub-standard campsite facilities and campsite management,
- Lack of unified rules and regulations for all workers,
- Lack of proper grievance redress channel for workers.

#### **3.2 Occupational Health and Safety Risks**

The project's construction and operation activities are primarily responsible for the health and safety risks that could affect the project's workforce, including PIU, consultants, construction workers and O&M personnel.

The typical risks include being exposed to the physical dangers of using construction equipment, working near moving traffic, operating cranes, and hoisting equipment, working on or near scaffolding, tripping, and falling, handling bitumen, burns, being exposed to noise and dust, falling objects, traffic risks from operating project-related vehicles, exposure to hazardous materials, and exposure to electrical risks from using tools and machinery. Furthermore, exposure to untreated sewage, risk of disease from vectors drawn to standing water (treated and untreated), risk of flooding, working in confined spaces, risk of acute poisoning from harmful gases/ reagents/ chemicals.

To reduce the risks to the health and safety of employees, it is crucial to identify hazards and manage associated risks. Additionally, it is projected that taking a proactive approach to risk management will lead to significant cost savings, a decrease in compensation claims, and a reduction in noncompliance with health and safety laws, with overall safer and better working conditions for all involved.

Labor related risks will be minimized by adhering to the mitigation hierarchy, which dictates:

- VI. Hazard Elimination
- VII. Substitution of process, substance, or tools
- VIII. Prevention of contact with risky object i.e., create barriers, install guards, etc.
- IX. Implementation of safe system of work such as permit to work systems, fixing of time limits on hazardous activities performance
- X. Use of appropriate personal protective equipment (PPE)

To ensure a safe and healthy workplace, the PIU along with its consultants and contractors will take reasonable care to identify all foreseeable health and safety hazards, which hold the potential to harm employees. Hazards may arise from the work process, the equipment and materials in use, the work environment, or other people involved.

The project and all associated workers will follow occupational health and safety regulations. All contractors must include a comprehensive description of their occupational health and safety management strategy with their bids. One of the factors the PIU will consider when choosing the contractors is the applicability of these safety provisions and their previous track record in doing so. All contractors must make sure that workers wear personal protective equipment (PPE), get safety training, and take other preventative measures as specified in the WB OHS Guidelines and in a setting that complies with ESS2 criteria. Both the company and the employee are accountable for safety, where they must work together to create and implement an OHS programme as well as safe work practices and procedures.

The following table provides a summary of the major OHS risks related to the project's activities:

<b>Key Potential Occupational Hazards/Risks and Control Measures</b>		
<b>Activity</b>	<b>Hazards / Risks Involved</b>	<b>Prevention / Control Measures</b>
Untrained employees at jobs or illegal individuals entering the work area	<ul style="list-style-type: none"> <li>All the risks listed in this table apply to unskilled people and are therefore relevant to all activities.</li> <li>Possibility of allowing incompetent staff to engage in a high-risk activity that could harm them or others.</li> </ul>	<ul style="list-style-type: none"> <li>Only physically, mentally fit, qualified, and competent people should be hired.</li> <li>Make sure that everyone on staff has gone through the induction procedure, which includes orientation and training on the dangers specific to the working site and the tasks to be performed.</li> <li>All Standard Operating Procedures (SOPs) must specify the necessary training and skills.</li> <li>Every day before work starts, a Toolbox Talk must be completed.</li> <li>The work area will only be accessible to those who have completed the risk assessment.</li> <li>Any access to places where work is to be done must be regulated and only authorized by a responsible employee or contractor.</li> </ul>
Shifting of material at work sites	<ul style="list-style-type: none"> <li>Ergonomic injuries</li> <li>Slips, trips, and fall</li> </ul>	<ul style="list-style-type: none"> <li>Create a secure entrance to the worksite.</li> <li>Avoid inclement weather and only labor during the day, when it is not too hot or raining.</li> <li>Keep a mobile phone on hand as a backup communication tool and a radio.</li> <li>Choose the least dangerous route.</li> <li>Use hard hats with chin straps and non-slip shoes.</li> </ul>
Moving Machinery	<ul style="list-style-type: none"> <li>Accidents can occur when workers come into contact with vehicles or equipment during the mobilization and use of</li> </ul>	<ul style="list-style-type: none"> <li>To operate the mobile equipment to be used and to work near mobile equipment to be used, workers must have the necessary training and competence.</li> <li>A regular preventative maintenance inspection programme is required for all plant, including mobile equipment, and supporting infrastructure.</li> </ul>

	<p>materials and equipment.</p> <ul style="list-style-type: none"> <li>• Personal Injury / Fatality / Equipment &amp; Utility Damage</li> <li>• Struck by vehicle</li> <li>• Blind spot</li> <li>• Toppling of the equipment</li> <li>• Contact with power transmission</li> </ul>	<ul style="list-style-type: none"> <li>• The design and installation of guards should follow the relevant machine safety regulations.</li> <li>• All unauthorized individuals and non-essential workers must stay outside of the operating area and swing radius of the equipment.</li> <li>• Installation of reverse alarms and warning lights in all vehicles and large machinery.</li> <li>• Drivers and operators must keep a maintenance log.</li> <li>• Sloping or benching for excavations deeper shall be designed.</li> <li>• Availability of banks man / flag man.</li> <li>• Means of access/egress (ladder) required if it is 4 feet deep or more.</li> <li>• Spoil dirt must remain at least 1 meter from of the trench/excavation.</li> <li>• Trench/ Excavations are to be identified and barricaded.</li> <li>• Personnel are not permitted to work in trench excavations where water is accumulating.</li> <li>• Fall Protection is required for walkways over deeper than 2 feet.</li> <li>• Identification, isolation, protection of underground utilities and structures nearby to be taken care.</li> </ul>
Chemical / Fuel	<ul style="list-style-type: none"> <li>• Chemical burns/ dermatitis/ Skin irritation.</li> <li>• Inhalation / Ingestion &amp; Absorption</li> <li>• Spillage.</li> <li>• Fire</li> </ul>	<ul style="list-style-type: none"> <li>• Development of safe working procedures. Reduction of number of workers exposed to hazards &amp; duration and frequency of exposure.</li> <li>• Use of personal protective equipment.</li> <li>• Regular environmental and medical monitoring. Availability of Firefighting equipment.</li> <li>• Earth bonding while transferring fuel.</li> <li>• Use of drip trays.</li> <li>• Lined secondary containment, availability of spill containment kit.</li> <li>• Provision and Display of Material Safety Data Sheets (MSDS)</li> <li>• Chemical &amp; Fuel handling training for workers.</li> </ul>
Fire	<ul style="list-style-type: none"> <li>• Accidental fires due to electrical short circuit.</li> <li>• Burns / Fatality.</li> <li>• Equipment Damage</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic fire detection system and control system should be provided.</li> <li>• Emergency back-up power should be provided for the automatic systems.</li> <li>• Matches, cigarettes, etc. should be prohibited.</li> <li>• Soldering, welding, or cutting torches should be used after taking hot work permit from the consent authority.</li> <li>• Being a WWTP project, in case of fire treated water reservoir will be used for emergency operation.</li> </ul>

Electrical	<ul style="list-style-type: none"> <li>• Poor electrical installations and faulty electrical appliances.</li> <li>• Contact with live parts causing shock and burns</li> <li>• Short circuits.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure safety of electrical installation and its maintenance.</li> <li>• Provision of safe and suitable equipment.</li> <li>• Provision of safety devices</li> <li>• Carry out preventive maintenance.</li> <li>• Lock Out Tag Out (LOTO) Procedure.</li> <li>• Permit To Work (PTW) for maintenances.</li> <li>• Personal Protective Equipment (PPE) Utilization</li> </ul>
Biological	<p>Workers working in the Wastewater Treatment Plant are prone to following biological hazards:</p> <ul style="list-style-type: none"> <li>• Diseases caused by infectious agents present in raw effluent.</li> <li>• Diseases caused by insects or rodents proliferating in the sludge drying beds.</li> </ul>	<ul style="list-style-type: none"> <li>• Employees shall understand the risks through proper instruction, training and supervision, there will be no direct contact with chemicals.</li> <li>• Provisions and use of suitable personal protective measures.</li> <li>• Provision of adequate welfare and sanitation facilities as well as first-aid measures considering the heavy contamination.</li> <li>• Provision of separate eating facilities to avoid food poisoning. Effective arrangement for monitoring health of staff.</li> </ul>
Manual Handling	Physical / Back Injuries	<ul style="list-style-type: none"> <li>• Use proper lifting tools</li> <li>• Only authorized person should operate material handling equipment.</li> <li>• Assess weight of the material, distance to be carried and hazardous etc., before lifting the load.</li> </ul> <p>Wear PPE's while handling of materials. Whenever possible, mechanized materials handling shall be adopted. While lifting a load physically, keep the load as near as possible to the body with feet properly placed for body balance. Bend knees, keep back straight, keep the load closed to the body and lift the load.</p>
Hot Works	<ul style="list-style-type: none"> <li>• Burn /Personal Injury Equipment &amp;</li> <li>• Utility Damage</li> <li>• Fire &amp; Explosion</li> </ul>	<ul style="list-style-type: none"> <li>• Clearing the area of combustible materials</li> <li>• Provision of suitable fire extinguishers</li> <li>• Maintaining a careful watch throughout the work by supervisors</li> <li>• A permit to work (PTW) system can help manage the risk on larger projects</li> <li>• Plant and equipment: select electrical and engine driven plant of suitable capacity to prevent overheating</li> <li>• Smoking: bring the rules on smoking to the attention of all workers and visitors to the site and enforce them.</li> <li>• Electrical installations: should be of sufficient capacity for the intended use and designed,</li> </ul>

		installed, inspected, and maintained by competent people.
Lifting Operations	<ul style="list-style-type: none"> <li>• Personal Injury / Fatality</li> <li>• Equipment &amp; Utility Damage</li> <li>• Equipment Failure. Falling objects</li> </ul>	<ul style="list-style-type: none"> <li>• Use of Inspected and certified crane and Lifting gear</li> <li>• Cordon Off Lifting radius.</li> <li>• Competent Crane operator &amp; rigger/ Signaler.</li> <li>• Ensure availability of lift Plan &amp; load chart.</li> <li>• Ensure ground is stable</li> <li>• Ensure pre-operational check listing of crane.</li> <li>• Prohibition on standing / working under suspended load.</li> <li>• Use of Tag line to control load's movement /swing.</li> <li>• Prohibition of lifting operation in windy conditions.</li> </ul>
Confined Spaces	<ul style="list-style-type: none"> <li>• Personal Injury / Fatality</li> <li>• Entrapment, oxygen deficiency, toxic &amp; explosive atmospheres, and asphyxiation.</li> <li>• Heat &amp; humidity.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure working in confined spaces under PTW system.</li> <li>• Effective Emergency Response Plan (ERP)</li> <li>• Standby Men</li> <li>• Atmospheric / Gas Testing</li> <li>• Ventilation</li> <li>• Illumination</li> </ul>
Other activities	<ul style="list-style-type: none"> <li>• Working under Adverse Weather Conditions</li> </ul>	<ul style="list-style-type: none"> <li>• Other than during emergency restoration operations where the greatest efforts must be taken to prevent any mishaps, the erection or maintenance work shall not be performed during high wind, thunderstorms, or unfavorable weather conditions that would make the work hazardous.</li> </ul>
	<ul style="list-style-type: none"> <li>• Risks associated with operation of vehicles (eg, accidents)</li> </ul>	<ul style="list-style-type: none"> <li>• For the project, only licensed drivers will be hired.</li> <li>• The project drivers will receive training on safe driving techniques. The cars will be kept in good working condition and equipped with all necessary safety features, such as safety belts.</li> </ul>
	<ul style="list-style-type: none"> <li>• Improper use of PPE (Personal Protective Equipment)</li> </ul>	<ul style="list-style-type: none"> <li>• All times will be spent wearing the proper PPE.</li> <li>• Each employee must dress appropriately for the job in order to comply with PPE regulations, reducing or at the very least preventing safety risks and protecting themselves from them.</li> <li>• PPE needs to be in good shape.</li> <li>• PPE should only be bought from reliable vendors.</li> </ul>
	<ul style="list-style-type: none"> <li>• Poor Housekeeping/ Maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Facilities for employees must be sufficient, spotless, and well-maintained.</li> <li>• Where dangerous products are handled, it should be illegal to smoke, eat, or drink in the workplace.</li> </ul>

		<ul style="list-style-type: none"> <li>• It is crucial to immediately clean up any oil or other liquid spills on the floor because they are a major contributing factor to mishaps.</li> <li>• Aisles should be broad enough to safely and comfortably fit both people and vehicles.</li> <li>• All tools should be routinely inspected, cleaned, and repaired, and any worn or damaged tools should be removed from service.</li> <li>• Each trash can should have a distinct label (e.g., recyclable glass, plastic, scrap metal, etc.)</li> <li>• Every storage space needs to be identified.</li> </ul>
	<ul style="list-style-type: none"> <li>• Covid-19 Considerations</li> </ul>	<ul style="list-style-type: none"> <li>• Work tasks will be rearranged, or the number of workers on the jobsite reduced, to allow for social/physical distancing, or workers will be rotated through a 24-hour schedule.</li> <li>• All workers will receive prevention training to help them avoid the spread of COVID-19.</li> <li>• Communication strategy/plan to support regular communication, accessible updates, and clear messaging to employees about the most up-to-date facts and statistics, as well as applicable procedures.</li> </ul>

### 3.3 Child and Forced Labor

People under the age of 18 will not be employed on construction projects that involve hazardous work, except possibly in offices or jobs other than construction. Workers, as part of a contractual requirement, will be required to provide legally recognized documents such as a Computerized National Identity Card (CNIC) to verify their age in order to ensure that no children are hired to work on the project. However, if other labor-related risks emerge during project implementation, the PIU will devise procedures to mitigate the effects. This will include regular community awareness raising sessions to educate residents on the prohibition and negative consequences of child and forced labor.

The above social impact is estimated to be low because: (i) local labor will be prioritized for use in construction activities, while measures to control the age of hired workers will be implemented; (ii) the contractor/subcontractors shall not hire child labor for project-related jobs, where a commitment not to use child labor is one of the required conditions in the bidding documents; and (iii) workers will be trained on labor safety, traffic safety, and sanitation before beginning work. (iv) Contractor supervision PIU staff will monitor and report the absence of forced labor.

### 3.4 Labor Influx

The Project's focus will be on localizing economic benefits with limited opportunities for outside workers to service work that requires specialized/skilled labor which is not available in project localities. Due to the availability of local labor supply in the province and the scale of work anticipated under the Project, a large-scale labor influx is not anticipated. Except for a few managers, supervisors, and skilled workers, the majority of workers can be found locally or in nearby areas. The preference for local labor (based on skill and experience capacity) is expected to reduce the risk of labor influx. Specific requirements to manage risks associated

with labor influx, such as interactions between project workers and local communities, will be addressed in this document through agreed standards, a Code of Conduct (**Annex I**), and training.

### **3.5 Labor Disputes over Terms and Conditions of Employment**

Labor disputes are unavoidable in a new construction environment. Demand for limited employment opportunities; labor wage rates and payment delays; disagreement over working conditions; and health and safety concerns in the workplace are all likely causes of labor disputes. Furthermore, employers such as contractors/subcontractors may retaliate against workers who demand legitimate working conditions, raise concerns about unsafe or unhealthy working conditions, or raise any grievances, and such situations may lead to labor unrest. However, in order to implement the project policy on fair labor treatment in accordance with ESS2, project contractors/subcontractors will be required to provide their labor with employment information while negotiating with the laborers to reach an agreement on terms and conditions of employment before signing labor contracts. The most efficient mitigating actions to deal with labor disputes during project implementation will be to monitor the implementation of the terms of work conditions that have been agreed upon by both sides and to establish the grievance redress mechanism (GRM) for laborers.

### **3.6 Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)**

Although the number of new employees will be relatively small, as was previously mentioned, new employees may develop strong social ties with the local populations outside of their own social circles. This may result in undesirable and/or unlawful behavior, such as unwelcome sexual advances against women and children and SEA/SH. Using the SEA/SH Risk Assessment Tool of the World Bank, this risk has been rated as Moderate. All contractors will be expected to follow the procedures outlined in the World Bank's Procurement Regulations in order to establish a written contract with their employees that is materially consistent with ESS2's goal. A Code of Conduct created by the Contractors and authorized by PIU will be required to be signed by the employees.

### **3.7 Summary of Labor Risks & Impacts**

The table below presents a summary of the potential risks and impacts related to labor and working conditions, together with mitigation measures to avoid, eliminate, or reduce associated impacts.

These labor risks and impacts are identified at a preliminary level, where they will be further explored at a site specific and sub-project level for each sub-project planned under KWSSIP-2. Subsequently, the required mitigation measures, implementation responsibilities and execution methodologies in a specific manner shall also be described in the subproject-specific instruments (ESMPs/ESIAs) that will be prepared in line with the ESMF. The impacts and mitigation measures determined in these assessments will be collated in the form of an Environmental & Social Mitigation Matrix for each sub-project, which will be made part of the contractor's bidding documents and contracts as mandatory items for compliance. A supervision consultant will be hired to oversee the implementation of each facet of the sub-projects including adherence to the environmental and social mitigation measures included in the contractor's contracts. An Independent Monitoring Consultant will also be brought on board to provide a third-party perspective and ensure that the implementation of these mitigation measures is being carried out effectively.

<b>Risks &amp; Impact Mitigation</b>				
<b>Category</b>	<b>Worker Impacts/ Risks</b>	<b>Project Impacts/ Risks</b>	<b>Mitigation Measures</b>	<b>Responsibility</b>
Recruitment and selection of workers	Perception of unfair recruitment and selection processes	Community tensions – stop work practices that will affect implementation	Human Resources Policy, including at least: <ul style="list-style-type: none"> <li>• Selection criteria for each position</li> <li>• Equal opportunities for men, women, and transgenders</li> <li>• Method and place of recruitment</li> <li>• Maximize work opportunities for local citizens</li> <li>• Enhance local employee’s skills base through training</li> </ul>	PIU KWSSIP, contractors, and consultants
Conditions of employment (earnings/ benefits)	Perceptions that wages/ salaries and benefits are less for locals relative to outsiders	Work stoppages, protests, absenteeism, sit-ins, sabotage and conflict at the workplace	The PIUs policy needs to follow: <ul style="list-style-type: none"> <li>• Contract arrangements and content</li> <li>• Equal pay for equal work</li> <li>• Process for pay increases</li> <li>• Pay scales and increments as well as other benefits</li> </ul>	PIU KWSSIP, contractors, and consultants
Labor relations (conflict handling)	Workers feel aggrieved and do not know how to communicate their issues	Work stoppages, protests, absenteeism, sit-ins, sabotage, and conflict at the workplace	The PIUs policy needs to include the following: <ul style="list-style-type: none"> <li>• Effective grievance redress process which should be gender sensitive</li> <li>• Disciplinary procedures</li> <li>• Workplace rules and regulations</li> <li>• Demobilization procedures</li> <li>• Effective information dissemination to workers</li> </ul>	PIU KWSSIP, contractors, and consultants

<p>Labor communication mechanisms</p>	<ul style="list-style-type: none"> <li>Workers are not informed about activities or events that affect them</li> <li>Workers are unable to communicate collective issues plaguing them</li> <li>Rumors/ misinformation spreading</li> </ul>	<ul style="list-style-type: none"> <li>Inadvertent actions due to rumors or incorrect perceptions</li> <li>Poor morale and unproductive work force</li> </ul>	<ul style="list-style-type: none"> <li>Effective communication mechanisms including:                             <ul style="list-style-type: none"> <li>Regular written communication for all workers about the project activities and operations</li> <li>Worker committees/ organizations/ unions</li> <li>Use of notice boards/ toolbox</li> </ul> </li> </ul>	<p>PIU KWSSIP, contractors, and consultants</p>
<p>Child Labor</p>	<p>Recruitment of individuals, who by virtue of age, would be exposed to hazardous situations and be subject to impaired social development</p>	<p>Increased health &amp; safety risk to workforce, potential non-compliance with national labor laws, and reputational risk to the project</p>	<p>Human resources and contracting policies covering recruitment and selection processes that specifically address issues associated with child labor</p>	<p>PIU KWSSIP, contractors, and consultants</p>
<p>Employment conditions, wages, and benefits</p>	<p>Perceptions that wages, salaries, and benefits are not fair</p>	<p>Work stoppages, protests, absenteeism, sit-ins, sabotage, and conflict at the workplace</p>	<ul style="list-style-type: none"> <li>Human resources policy with respect to equal pay for equal work according to the local conditions and industry averages</li> <li>An effective employee complaints/ grievance process</li> </ul>	<p>PIU KWSSIP, contractors, and consultants</p>
<p>Worker's relations/ interaction with community</p>	<ul style="list-style-type: none"> <li>Disturbing nearby communities due to the</li> </ul>	<p>All negative actions on community may cause hindrance in the project construction/ operation as well as other project related</p>	<ul style="list-style-type: none"> <li>Implement the control measures to avoid/ and or minimize the impacts of camp and living conditions of workers on communities. Control measures include:                             <ul style="list-style-type: none"> <li>Encourage to recruit local labor/ staff</li> </ul> </li> </ul>	<p>PIU KWSSIP, contractors, and consultants</p>

	<p>worker's routine activities</p> <ul style="list-style-type: none"> <li>• Communities are negatively impacted by some camp activities</li> </ul>	<p>activities such as road blockage, community sit ins resulting in prevention of workers, and contractors from entering the project site</p>	<ul style="list-style-type: none"> <li>○ Limited interaction of outsiders/ foreign workers with the local/ nearby community of the camp</li> <li>○ Provision of cultural sensitivity awareness training to facilitate appropriate actions interaction with communities</li> <li>○ Limited movement of workers during the peak working hours of community</li> </ul>	
SEA/SE aspects	SEA/ SH risks for the communities as well as for workers	-	<ul style="list-style-type: none"> <li>• Routes/ places used by women will be avoided as far as possible. If unavoidable, alternate routes will be identified for communities, If required, especially along routes frequented by women such as routes to local water wells</li> <li>• Camp sites for construction will be 500 m away from the nearest community</li> <li>• Construction crew will avoid entering villages and settlements</li> <li>• Communities will be informed and consulted before commencing works inside or near the communities</li> <li>• Awareness raising among communities will be carried out for SEA/SH risks</li> <li>• Strict code of conduct will be maintained by the construction crew. Local norms will be respected</li> <li>• Project staff will receive training on the prevention of SEA/SH</li> <li>• Provision related to SEA/SH will be incorporated in the bidding documents</li> <li>• Workers will be required to sign the Code of Conducts prepared by the Contractors which will be reviewed, and approved by PIU</li> </ul>	PIU KWSSIP, contractors, and consultants

			<ul style="list-style-type: none"> <li>• Training and awareness raising will be carried out for the workers on SEA/SH aspects</li> <li>• Identification and mapping of service providers</li> </ul>	
Worker Accommodation/camp specifications	Accommodation is considered sub-standard which leads to discontent amongst the residents and concerns about perceived health risks	<ul style="list-style-type: none"> <li>• Workers have low morale</li> <li>• Perception amongst workers that the project does not care for their welfare, affecting the project</li> </ul>	<p>Build camps to minimum specifications. The following plans will be applied as necessary:</p> <ul style="list-style-type: none"> <li>• Minimum health requirements</li> <li>• Minimum camp specifications</li> <li>• Operations accommodation</li> <li>• Emergency Response Plan</li> <li>• Security Management Plan</li> </ul>	Contractors
Camp Management Practices	<p>Residents do not live in harmony and the potential for conflict arises.</p> <p>Residents do not know how to make a complaint</p>	-	<ul style="list-style-type: none"> <li>• Implement an induction program to be attended by all residents that covers at least the following:                             <ul style="list-style-type: none"> <li>○ Camp rules and regulations</li> <li>○ Code of conduct</li> <li>○ Camp grievance mechanism</li> <li>○ Camp disciplinary procedure</li> <li>○ Cultural awareness</li> <li>○ Health, safety, and security</li> <li>○ First aid kits are adequately stocked</li> </ul> </li> </ul>	Contractors
Housekeeping	The general appearance of the camp deteriorates making camp life unpleasant	The overall camp experience is compromised which in turn leaves workers demoralized and unproductive.	<ul style="list-style-type: none"> <li>• Ensure that campgrounds and common areas are routinely cleaned and organized with appropriate signage in place</li> <li>• Establish easily accessible, designated smoking areas which are clearly highlighted and regularly cleaned</li> <li>• Ensure that equipment and facilities are kept clean and well maintained</li> </ul>	Contractors

## **4. OVERVIEW OF LABOR LEGISLATION**

This chapter presents an overview of the labor legislation in the country relevant to the KWSSIP project, along with relevant World Bank requirements related to workers and working conditions.

### **4.1 Overview**

There are a number of labor laws in Pakistan, where most of the labor legislations are based on the inherited legal framework of Britain. Many of the legislations were derived from colonial acts and amendments, which were enacted from 1850 to 1947 and still exist as a part of the country's labor legislation which has been enacted either at the Federal or Provincial level. These labor laws are broad and contain several ordinances, acts, rules and regulations and other statutes relating to industrial, commercial, and labor establishments. These laws compliment the smooth running of the business with regard to matters relating to employers and employees in order to achieve the target of higher productivity, reasonable profits, better wages and reduction in unjust practices or discrimination. Many of these laws pertain to the implementation of the international labor conventions that Pakistan has ratified.

### **4.2 Labor Rights in the Constitution of Pakistan (1973)**

The Constitution of Pakistan 1973 provides a framework of rights for labor force and contains provisions for the economic and social well-being of the people and for the promotion of social justice. The Constitution of Pakistan contains a range of provisions with regards to labor rights found in Part II: Fundamental Rights and Principles of Policy. Fundamental rights, such as security of livelihood, prohibition of bonded labor, eradication of slavery, and the right of association have been incorporated in the constitution in Part II. Thus, the constitution affirms the progress of labor legislation, which is conducive to change and to benefit the working class in the following articles:

- Article 11 of the constitution prohibits all forms of slavery, forced labor, and child labor
- Article 17 provides for a fundamental right to exercise the freedom of association and the right to form unions
- Article 18 proscribes the right of its citizens to enter upon any lawful profession or occupation and to conduct any lawful trade or business
- Article 25 lays down the right to equality before the law and prohibition of discrimination on the grounds of sex alone
- Article 37(e) makes provision for securing just and humane conditions of work, ensuring that children and women are not employed in vocations unsuitable for their age or sex, and for maternity benefits for women in employment

### **4.3 International Labor Standards Applicable in Pakistan**

Pakistan has various obligations under international law pertaining to labor rights. It is a signatory to the Universal Declaration of Human Rights 1948 which provides the right to work; to free choice of employment in just and favorable conditions of work, and to protect against unemployment. It also includes the right to equal pay for equal work; the right to just and favorable remuneration ensuring an existence worthy of human dignity; and the right to form and join trade unions.

The International Covenant on Economic, Social and Cultural Rights 1966 under Articles 6-8 further articulates these rights by placing obligations on the State to protect the right to work as well as working towards fully realizing the right through provision of fair wages with equal pay for equal work which is sufficient to provide a decent living for themselves and their family; the requirement for safe and healthy working conditions; equal opportunity for promotions; rest, leisure, holidays, limited working hours, etc. It also recognizes the right to join and form trade unions and all acts ancillary to it. The International Covenant on Civil and Political Rights 1966 protects civil rights and the right to join trade unions. All of the above, along with Convention for the Elimination of all Forms of Discrimination Against Women 1979, protect against discrimination, including specific mention of discrimination on the basis of sex. Pakistan is also a signatory to the 1998 Declaration of Fundamental Rights at Work which reaffirms the constitutional principle of the elimination of discrimination in respect of employment and the Protection Against Harassment of Women at the Workplace Act, 2010.

### **4.4 International Labor Organization (ILO) Labor Conventions – Ratifications from Pakistan**

The government of Pakistan has ratified 36 ILO Conventions, including eight fundamental conventions as of now. In the South Asia region, Pakistan is the second country that has ratified all eight fundamental conventions as enshrined in the ILO Declaration on Fundamental Principles and Rights at Work. The ILO works in close collaboration with its tripartite constituents towards achieving Pakistan's decent work objectives.

The ILO Governing Body has identified eight "fundamental" Conventions, covering subjects that are considered to be fundamental principles and rights at work, which are listed below:

- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- Forced Labor Convention, 1930 (No. 29) (and its 2014 protocol)
- Abolition of Forced Labor Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labor Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

### **4.5 Federal Labor Laws**

Labor legislation in Pakistan traces its origin to colonialism, which has over time evolved through a continuous process of adjusting to the socio-economic conditions, state of industrial development, level of literacy and social welfare. Laws related to labor rights and welfare are listed below:

- Factories Act, 1934
- Industrial Relation Act, 2012

- Workman Compensation Act, 1923
- Minimum Wages Ordinance, 1961
- Payment of Wages Act, 1936
- Industrial & Commercial Employment Standing Orders Ordinance, 1968
- Shops & Establishment Act, 1969
- Maternity Benefit Ordinance, 1958
- The Mines Maternity Benefit Act, 1941
- Apprenticeship Ordinance, 1962
- Employees Old Age Benefit Act, 1976
- Prohibition of Employment of Children Act, 1938
- Employments of Children Act, 1991
- Bonded Labor Abolition Act, 1992
- Employees Cost of Living (Relief) Act, 1973
- Companies' Profits (workers participation) Act, 1968
- Workers Welfare Fund Act, 1971
- Minimum Wages (Unskilled Workers) (Amendment) 2015
- The Disabled Persons (Employment and Rehabilitation) Act, 2015
- The Protection Against Harassment of Women at the Workplace Act, 2010
- Transgender Persons (Protection of Rights) Act, 2018

The most pertinent of these are discussed below:

#### **4.5.1 Factories Act, 1934**

The Factories Act, 1934 concerns regulation of labor in factories and addresses issues regarding working condition, child labor and working hours for men and women labor, wages, working hours, rest interval, overtime, holiday and health and safety. The Factories Act also briefly refers to environmental issues. Section 14 deals with the disposal of industrial wastewater and states that “effective arrangements shall be made in every factory for the disposal of wastes and effluents due to the manufacturing process carried on therein.” The Factories Act states that “the Provincial Government may make rules prescribing the arrangements to be made under sub-section (1) subject to the approval of such authority as may be prescribed. This allowed the provincial governments to establish Minimum Wages Act, 2015.

#### **4.5.2 The Industrial Relations Act, 2012**

The Industrial Relations Act 2012, aimed at regulating the labor-management relations in the country, and allows to bring workers grievance to the attention of his or her employer, in writing, either him or herself, through the shop steward or through his or her trade union within three months of the occurrence of the cause of action. Forms of termination have been described as removed, retrenched, discharged or dismissed from service. To safeguard against abuse of power, victimization or unfair labor practices, the Labor Courts have been given powers to examine and intervene to find out whether there has been a violation of the principles of natural justice and whether any action by the employer was real or unjust.

#### **4.5.3 West Pakistan Maternity Benefits Ordinance, 1958 (The West Pakistan Maternity Benefit Rules, 1961)**

The law is applicable to female workers across the board within all establishments. Female workers are entitled to 12 weeks maternity leave. Every employer is liable for payment of maternity benefits at the rate of her wages last paid during the period of six weeks immediately

preceding and including the day on which the female worker delivers a child, and for each day of six weeks succeeding the day.

#### **4.5.4 The Industrial and Commercial Employment Act, 2013**

The law governs the industrial relationship between the employer and the workers to maintain industrial peace and settle disputes between them by negotiations, reconciliations, arbitration, and adjudication. This Act establishes and provides procedures for settling grievances and resolving disputes between workers and employers. It also specifies the procedure for lockouts and strikers and confers upon the right to establish or join trade unions of their own choices.

#### **4.5.5 The Employees Old-Age Benefits Act, 1976**

The Employees Old Age Benefits (EOAB) Act 1976 provides for certain old age benefits for the persons who are employed in industrial, commercial, and other organizations.

#### **4.5.6 Minimum Wages (Unskilled Workers) Act, 2013**

The Government has announced that “the minimum wages would be increased from Rs. 12,000 to 13,000 per month (w.e.f 1<sup>st</sup> July 2015). Since then, the minimum wages have been reviewed annually. The current minimum wage, as announced in July 2022, was to be Rs. 25,000 per month in Sindh.

#### **4.5.7 The Disabled Persons (Employment and Rehabilitation) Act 2015**

The Disabled Persons (Employment and Rehabilitation) Act 2015 provides for the employment, rehabilitation, and welfare and wellbeing of disabled persons.

#### **4.5.8 Employment of Child Act (ECA), 1991**

Article 11(3) of the Constitution of Pakistan prohibits employment of children below the age of 14 years in any factory, mines, or any other hazardous employment. In accordance with this Article, the Employment of Child Act (ECA) 1991 disallows the child labor in the country. The ECA defines a child to mean a person who has not completed his/ her fourteenth year of age. The ECA states that no child shall be employed or permitted to work in any of the occupation set forth in the ECA (such as transport sector, railways, construction, and ports) or in any workshop wherein any of the processes defined in the Act are carried out.

#### **4.5.9 The Protection Against Harassment of Women at the Workplace Act, 2010**

In 2010, the Pakistan Government passed a Law called “Protection Against Harassment of Women at Workplace, Act 2010”. The Protection against harassment of Women at the Workplace Act 2010 provides legal protection to women against harassment at the workplace, and reforms the existing legislation regarding women’s right to work in Pakistan. It focuses on sexual harassment experienced at the workplace by employees and facilitates the transformation of the work environment, so that it is free of sexual harassment, intimidation, and abuse. The law makes it a special crime to use force against a woman, or even threaten to use force, if the intention is to “disturb her modesty”. It is an offence only when the accused intended or knew it to be likely that the acts in question would lead to an outrage of the victim’s modesty.

## **4.6 Provincial Labor Laws**

In 2010, subjects of labor and employment were devolved to provinces under the 18<sup>th</sup> Amendment to the Constitution of Pakistan, as a result of which the federal labor laws became applicable on provinces under Article 270 AA (6) of the Constitution of Pakistan. The 18<sup>th</sup> Constitutional Amendment in Pakistan has altered the landscape of the labor administration system in the country. Provinces now have a greater responsibility and resources in terms of legislation and implementation. Each province has developed its own labor policy to protect worker's rights. The policy relevant to the KWSSIP project is the Sindh Labor Policy, 2018. This Policy sets out the framework on industrial relations, social and economic wellbeing of the people of the province of Sindh.

After the Eighteenth Amendment, Sindh adopted various laws which comprised of labor laws, welfare and industrial relations laws, where the applicable labor laws are discussed below:

### **1. The Sindh Workers Compensation Act 2015**

This act outlines the details regarding compensation to be paid to workers in case of fatality, loss of hearing, eye sight, limbs during the conduct of work activities. It also outlines the Occupational diseases according to the nature of work and compensation to be paid to the workers in case it proved that the worker suffered from the disease due to workplace exposure.

### **2. The Sindh Minimum Wages Act 2015**

The Sindh Minimum Wages Act 2015 outlines the details with respect to payment of minimum wages to workers of different categories as per gazette notification by the Government of Sindh. The minimum wages to be paid shall be reviewed periodically and minimum wages notified. Employers are bound to abide by the Minimum Wages Act and pay the wages as notified.

### **3. The Sindh Terms of Employment (Standing Orders) Act ,2015**

The Act outlines the classification of workers into:

- i) permanent;
- ii) probationer;
- iii) badly;
- iv) temporary;
- v) apprentice;
- vi) contract worker.

The terms and conditions of employment shall be provided to the worker in writing, holidays and leave with pay shall be provided. Rules for termination of services are defined in the Act. The Act outlines special provision for construction workers employment and termination at the end of the project.

### **4. The Sindh Payment of Wages Act 2015**

The Payment of Wages Act 2015 outlines the responsible person for payment of wages and method of payment of wages to workers. Procedure for fines and deductions is defined. Penalties have been fixed on the employer for non-payment of wages or illegal deductions.

### **5. Sindh Bonded Labor (Abolition) Act 2015**

The Act is gender sensitive, an anti-discrimination clause is added to each new proposed Law in accordance with ILO requirement viz: "No discrimination shall be made on the basis of sex, religion, political affiliation, sect, color, caste, creed, ethnic background in considering and disposing of issues relating to the enforcement of this Act". In all proposed Laws the cognizance has been changed from that of the Judicial Magistrate to the Presiding Officer Labor Courts who is a Session Judge.

This act is applicable as the proposed project may involve the numbers of staff/worker having different religion, political affiliation, sect, color, caste, creed, ethnic background.

**6. The Sindh Prohibition of Employment of Children Act 2017**

The Sindh Prohibition of Employment Act 2017 provides definitions for child and adolescent. A child is a person who is below fourteen years of age and an adolescent is a person who is over fourteen years of age and below eighteen years of age.

The Act outlines that no child labor shall be employed and no adolescent shall be employed to conduct hazardous work as defined in the Schedule.

The Act has fixed penalties in case of employment of child labor. All other labor laws are applicable in case of employment of children.

**7. The Sindh Occupational Health & Safety Act, 2017**

The Act makes provisions for occupational safety and health conditions at all workplaces in the province for the protection of workers during work. Under the Act, an Occupational Safety and Health Council will be established in Sindh with secretary of Sindh government's Labor and Human Resources Department as its chairperson.

The act applies in any Project situation where worker's rights and protections are enforced. This law is applicable to construction and Project workers and will be complied during construction and operation phases.

**8. The Protection against Harassment of Women at the Workplace (Amendment) Act 2022**

The Protection against Harassment of Women at the Workplace Act, 2022 introduced amendments in the previous Act of 2010, and has further broadened its scope. The Act defines harassment as (a) "any unwelcome sexual advance, request for sexual favors, stalking or cyber stalking, or other verbal, visual or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, including any gestures or expression conveying derogatory connotation causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment"; and (b) "discrimination on the basis of gender which may or may not be sexual in nature, but which may embody discriminatory and prejudicial mind-set or notion, resulting in discriminatory behaviour on basis of gender against the complainant".

**9. The Sindh Differently Aabled Persons (Employment, Rehabilitation, and Welfare) Act, 2017**

The Act provides for the employment, rehabilitation, and welfare of differently able persons. The definition of "differently able" is any persons who on account of injury, disease, or congenital deformity, is challenged for undertaking any gainful profession or employment in order to earn his livelihood and includes a person who is blind, deaf, physically challenged or mentally challenged.

This act is applicable as the proposed project will involve serious occupation health and safety issues during construction phase and may cause serious injury to worker/staff causing permanent disability and differently able

KWSSIP and its contractors are bound to abide by the terms and conditions of the above Acts. No child labor shall be employed at the project site(s). The worker shall be paid compensation as per the Sindh Workers Compensation Act 2015 in case he /she suffers from accident-causing injury during work at the project site(s) involving all Direct, contracted, primary and community workers.

Minimum wages shall be fixed as per the Sindh Minimum Wages Act 2015 (Sindh Act No. VIII of 2016, adopted on 2016-01-25) and any further notifications that may have been issued under the Act. All deductions, benefits shall be in accordance with those defined in the Payment of Wages Act 2015 and terms of Employment (Standing Orders) Act 2015.

#### 4.6.1 The World Bank Environmental & Social Standards (ESS): ESS 2 on Labor & working Conditions

The World Bank's stipulations related to Labor are outlined in its ESS2. The PIU will be required to promote sound worker-management relationships and provide safe and healthy working conditions. Key objectives under ESS2 dictate:

- Promote the fair treatment, non-discrimination and equal opportunity of project workers;
- Secure protection of 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;
- Prevent the use of all forms of forced labor and child labor;
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law;
- Provide project workers with accessible means to raise workplace concerns; and
- Promote safety and health at work

ESS2 applies to project workers including full time, part time, temporary, seasonal, and migrant workers. Where government civil servants are working in connection with the project, whether full time or part time, they will remain subject to the terms and conditions of their existing public sector employment agreement/ arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to government civil servants.

Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor law and ESS requirements (which will include collective agreements), including their rights related to hours of work, wages, overtime, compensation, and benefits. This information will be provided at the beginning of the working relationship and when any material changes occur.

The Table below provides the conformance of the National Labor Act with the key elements of the World Bank ESS 2.

<b>Conformance of the Pakistan National Labor Act with Key Elements of ESS2</b>	
<b>Key Elements of ESS2</b>	<b>Provisions in Pakistan Labor Laws</b>
Equal opportunity and non-discrimination	The law contains important provisions prohibiting discrimination based on sex and disability, including equal wages for equal work.
Timely payment	<ul style="list-style-type: none"><li>• Wages must be paid before the expiry of the 7<sup>th</sup> working day after the last day of the wage period</li><li>• Where the employment of any person is terminated by or on behalf of the employer, the wages earned by him shall be paid before the expiry of the second working day from the day on which his employment is terminated.</li></ul>
Minimum wage	The minimum wage as fixed by provinces in each year

Work hours	<ul style="list-style-type: none"> <li>Under the Factories Act 1934, no adult employee can be required or permitted to work in any establishment in excess of nine hours a day and 48 hours a week</li> <li>Section 8 of the West Pakistan Shops and Establishments Ordinance, 1969 likewise, restricts weekly work hours at 48 hours that includes rest and prayer times</li> </ul>
Worker rights	Regular leaves and benefits. The employer must provide reasons for termination.
Prevents use of all forms of forced and child labor	The national and provincial labor laws prohibit use of all forms of forced labor and child labor.
Protection of workers	The labor laws encompass a large array of rights to protect workers including the right to decent work and freedom of association to equal opportunity and protection against discrimination. Specific rights related to the workplace include health and safety in the workplace and the right to privacy at work, amongst many others.
Occupational Health & Safety	This law provides for comprehensive OHS and empowers the Department of Labor to conduct inspections of establishments and to impose penalties for violations of non-compliance.
Working Age of Workers	Under the Factories act 1934, no child who has not completed his fourteenth year shall be allowed to work in any factory.
Women	Under the Ordinance of 1958, women with at least four months employment in an establishment immediately preceding the day of delivery are eligible to get a total of twelve weeks of maternity leave, six weeks before and six weeks after the childbirth.
Persons with Disabilities (PWD)	Persons with Disabilities Rights and Protection Act 2013 provides for rights to discrimination free employment opportunities
Migrant Workers	No special provisions for migrant workers
Contract Workers	In the case where the wages of a worker employed by a contractor are not paid by the contractor, the wages must be paid by the employer of the establishment.
Community Workers	The labor law does not recognize community workers as defined in the ESS2 and hence does not provide any special consideration for such contracting arrangements. The law requires that all labor supply contracting agency will have to be formally registered, and workers should first be the responsibility of the contracting agency.
Primary Supply Workers	The law does not assign any responsibility to the project on the supplier's laborers and their working conditions. Workers of suppliers will have to be the responsibility of the suppliers.
Freedom of Association and collective bargaining	Article 17 of the Constitution not only guarantees freedom of association but also collective bargaining as a fundamental right. Keeping in view this provision, labor law in Pakistan allows formation and joining of

	trade unions/ associations to both the employers and the employees.
Access to a grievance redress mechanism	Workers can seek direct civil law redress from the Labor courts for complaints regarding terms and conditions employment and wages, health and safety, maternity welfare, and child labor offences are subject to criminal prosecution.

The table below, on the other hand, describes the main gaps of the government system with respect to the WB ESF Standards:

<b>Main Gaps of Government System with respect to WB ESF Standards</b>		
<b>WB ES Standard</b>	<b>Legislation</b>	<b>Gaps</b>
ESS2: Labor and Working Conditions	Factories Act 1934 Pakistan Occupational Health & Safety Act 2018	Working Conditions: <ul style="list-style-type: none"> <li>• The Act does not specifically require that development be assessed and reviewed in terms of labor and working conditions including OHS requirements before approval.</li> <li>• The Labor Act does not require development projects to prepare Labor Management Procedures/ Plans or OHS plans.</li> <li>• The Labor Act prohibits the use of child labor, however, it does not stipulate what age constitutes a child. The Child Labor (Prohibition and Regulation) Act 2000 prohibits the employment of any child below the age of 14 while children between the ages of 14 and 16 are allowed to work.</li> </ul>
ESS4: Community Health & Safety		Covered under ESIA but the systems do not provide clear requirements for the development project and implementation.

## **5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY**

This chapter discusses the legislation for OHS aspects in the country. Also discussed in the chapter are the WB guidelines on these aspects.

### **5.1 Occupational Health and Safety (OHS)**

The project will observe and ensure the protection against OHS risks to the workers embodied in various international laws, national, and provincial laws and administrative issuances governing the public sector. Observing and enforcing OHS protection should aim at: the promotion and maintenance of the highest degree of physical, mental, and social well-being of workers in all occupations; the prevention amongst workers of departures from health and safety caused by their working conditions; the protection of workers in their employment from risks resulting from factors adverse to health; and placing and maintenance of the workers in an occupational environment adapted to his/her physiological and psychological capabilities.

### **5.2 International Conventions**

#### **5.2.1 ILO Conventions**

ILO has formulated more than forty regulations, particularly concerning with the OHS issues. It has several major regulations as follows:

**ILO Technical Convention: C187 – Promotional Framework for Occupational Safety and Health Convention.** This Convention stresses:

- i. A safe and healthy working environment by formulating a national policy
- ii. Each member shall promote and advance, at all relevant levels, the right of workers to a safe and healthy working environment
- iii. In formulating its national policy, each Member, in light of national conditions and practice in consultation with the most representative organizations of employers and workers, shall promote basic principles such as assessing occupational risks or hazards; combatting occupational risks or hazards at source; and developing a national preventative safety and health culture that includes information, consultation and training.

#### **Prevention of Major Industrial Accidents Convention, 1993 (No. 174)**

The purpose of this convention is the prevention of major accidents involving hazardous substances and the limitation of the consequences of such accidents. The convention protects workers, the public, and the environment by preventing major accidents either on or off site and provides guidance on appropriate emergency planning.

#### **Safety and Health in Construction (1992)**

The objective of this code is to provide practical guidance on a legal, administrative, technical and educational framework for safety and health in construction with a view to: preventing accidents and diseases and harmful effects on the health of workers arising from employment in construction: ensuring appropriate design and implementation of construction projects: providing means of analyzing from the point of view of safety, health and working conditions, construction processes, activities, technologies and operations, and of taking appropriate measures of planning, control and enforcement.

#### **Safety and Health in Building and Civil Engineering Works (1972)**

Code of practice relating to occupational safety and occupational health in civil engineering and the construction industry, includes provisions concerning the work environment and equipment, fire protection, noise, machinery (including building machinery and electrical machinery, ionizing radiations, explosives, handling, occupational health, welfare, and healthcare services).

This code of practice covers 42 topics related to safety and health in building and civil engineering. The Main topics include workplaces and equipment, scaffolds, ladders and stairs, lifting appliances; railways, road and similar transport; construction equipment; electricity, blasting, concrete work, other building operations, excavations, underground construction, work in compressed atmosphere, work clothes, and personal protective equipment; hygiene and welfare; medical supervision.

## **5.2.2 United Nations and Group 20 Countries**

The United Nations has adopted 17 Sustainable Development Goals with specific target on OSH. Similarly, the G20 summit placed OSH on the agenda.

## **5.3 Provincial Legislation on OHS**

The Occupational Health and Safety Act 2017 is the applicable local legislation as this Act applies to all Workplaces. Details of each chapter are described below:

Chapter I identifies the duties of the employer as follows:

1. Undertake practical measures for Safety & Health and Welfare;
2. Identify, assess and address existing & new hazards;
3. Report and investigate incidents;
4. Provide and apply Safe Systems of Work, Safe tools & equipment & appliances
5. Safe use, handling, storage, disposal and transport of materials and substances;
6. Control physical, chemical, biological, ergonomic, psychosocial or other hazards, affecting workers and others;
7. Provide Information, Instruction and Training to ensure Safety & Health at Work;
8. Maintain workplace in safe, clean, orderly and risk-free condition with safe means of access;
9. Inform workers regarding work hazards, risks involved and preventive and protective measures;
10. Provide adequate PPE to prevent risk from injury and ill health;
11. Maintain records of all accidents at workplace;
12. Provide first aid arrangements and emergency provisions;
13. Take measures to prevent fires & measures in the event of fire; and
14. Collaborate in the case of simultaneous operations or joint premises

The duties of workers and volunteers are identified as follows:

1. Ensure safety & health of others who may be affected by his acts & omissions & not willfully do anything to endanger himself or others;
2. Use & take care of PPE provided by the employer;
3. Do not willfully interfere or misuse any appliance or equipment or convenience provided for safety & health of persons at workplace;
4. Resolve any situation being unsafe posing immediate threat with the employer or cease work until the dispute is resolved
5. Until the dispute is resolved, employer may assign the affected workers some temporary alternative work; and

6. Worker shall report any occupational accident, occupational Disease, dangerous occurrences, or commuting accident as per company OSH Policy.

The general duties of suppliers have been identified below:

1. Design & construction to be safe & without risk to safety & health;
2. Testing & examination;
3. Adequate information;
4. substance to be safe & without risk; and
5. Includes supply, handling, assembling, installing, erecting & testing of tools, machinery & equipment

Chapter II states rules that that Government has made for the safety and health of workers in any establishment by notification in official gazette.

The rules include the following matters:

1. Cleanliness and maintenance of building;
2. Illumination, ventilation, temperature, noise, dust, fumes and artificial ventilation;
3. Disposal of wastes and effluents;
4. Floors, stairs, mean of access, proper working space, overcrowding, pits, sumps, opening in floors, and allied things;
5. Drinking water and conservancy;
6. Guarding and fencing of machinery at work and work at, on or near moving machinery;
7. Self-acting machines and device for cutting off power; revolving machinery and pressure plants;
8. Instruction, training and supervision in relation to employment on dangerous machines and fencing or casing of machinery, wet floors, open wiring, safety fitting etc.;
9. Explosives or inflammable dust, gas and precautions against dangerous fumes etc.;
10. Precaution in case of fire;
11. Personal protective equipment;
12. Excessive weights;
13. Loading and earth moving machinery;
14. Cranes, hoists, lifts and other lifting operations;
15. Scaffolding and work at heights; and
16. Safety of building, machinery and manufacturing process

Whereas, The Sindh Occupational Health & Safety Act calls for:

1. Written Statement of Policy;
2. Consultation – formation of OHS Committee with worker representation; appointment of OHS officer;
3. Training of Health & Safety Representative;
4. Precautions against Contagious & Infectious Disease at Workplace; and
5. Compulsory Vaccination and Inoculation

Chapter III details enforcement measures and requires:

- Registration of workplaces and approval of site, buildings and other constructions to be used as workplaces; and
- Notification and investigation of accidents, dangerous occurrences and occupational illnesses

Chapter IV details the formation of Occupational Health and Safety Council headed by the Secretary Labor having members from industry, representatives from employers, representatives of workers, professionals, members from civil society and member from the Labor Directorate.

The Act has also fixed penalties and offences in case of non-compliance with the provisions of the Act. The maximum penalty for non-compliance is Rs.250,000/-

The Sindh Occupational Health & Safety Rules 2019 outline the measures to be undertaken to implement the requirements of the Sindh OSH Act 2017.

The organization needs to formulate OHS Policy which is the requirement of the Act. The contractors and suppliers shall comply with the provisions of the Act.

#### **5.4 The Labor Policy 2010 – Government of Pakistan**

The Labor Policy 2010 addresses the importance of OHS legislation in Pakistan as provided below:

- Labor laws relating to occupational health and safety will be consolidated and rationalized to avoid overlapping and inconsistencies
- Government shall enact suitable legislation to ensure health and safety of construction workers
- A Tripartite council on Health & Safety has been set up to identify health and safety hazards for workers of all economic sectors and to make recommendations for safety measures on a continuous basis.

#### **5.5 WBG EHS Guidelines**

The World Bank Group (WBG) has guidelines for Environment, Health, & Safety (EHS) that serve as useful references for general issues as well as sector specific activities. Projects financed by the WBG are expected to comply with this guideline as required by the policies and the standards. The EHS Guidelines are mainly on occupational health and safety, community health and safety as well as on construction and decommissioning. It contains guidelines cross cutting on environmental (waste management, ambient air quality, noise, and water pollution), occupational health and safety issues amongst others, applicable to all the industry sectors<sup>6</sup>.

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<sup>6</sup> [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/ehs-guidelines](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines)

## 6. RESPONSIBLE STAFF

### 6.1 KWSSIP / PIU Responsibility

The overall management of the Project is the responsibility of the PIU of KWSSIP. PIU will oversee the LMP's implementation. The LMP must be followed in all aspects of the procurement process. Contractor(s) and subcontractor(s) shall be hired in a transparent manner based on their experience and competency. The contractor(s) must ensure that all LMP requirements for labor (direct and contracted), protection, and facilities are met, and this must be included in the written agreement.

As follows, the E&S team at PIU will implement and monitor the provision of this LMP:

- Ensure that the workers are in accordance with the E&S regulations, including the LMP and OHS provisions;
- Confirm that the duties owed to the direct workforce are carried out as outlined in this LMP and contractual documents;
- Track the project workers' training;
- When conducting activities, keep an eye out for any potential dangers of significant safety issues;
- Create and put into action a grievance procedure for direct employees that includes tracking the progress of complaints and their outcomes as well as ensuring that complaints received from employees are quickly addressed.
- Ascertain that the project's workers are aware of the grievance procedure;
- Keep records of the hiring process, including age and gender verification, as well as the hiring of the hired staff. Orient new hires to environmental, social, and occupational health and safety issues and provide ongoing training for these personnel.
- Report any incidents or accidents involving project personnel and information about labor and occupational health and safety performance to the World Bank.

### 6.2 Contractors' Responsibilities

**Occupational Health and Safety:** To guarantee adherence to every LMP requirement, the contractor(s) must appoint OHS representative(s). Every month, the contractor must give the PIU a report on all incidences. The contractor is responsible for making ensuring that employees are taught in using personal protective equipment and safety precautions.

Immediately notifying the PIU of serious situations is required. Regular meetings between the PIU of KWSSIP and the contractor(s) will be held to assess progress and make sure that the OHS requirements of the LMP have been met. Follow-up on the action plans developed for the accidents that happened on specific sites. When executing the safety measures in the LMP, any challenges must be addressed by the contractor.

**Labor and Working Conditions:** Contractors shall maintain records in compliance with the procedures set forth in this LMP. PIU may at any point request records in order to verify that labor rules are being observed. The PIU will compare records to actuals at least once every month and, if required, may mandate rapid corrective action. A summary of issues and solutions will be delivered in quarterly reports to the World Bank.

**Worker Grievances:** KWSSIP's current grievance procedures will still be available to the Project staff, however, contractors will be required to establish a separate grievance redress system for employees that satisfies the minimum requirements of this LMP. The PIU's social development specialist will review all records on a monthly basis. In instances where workers' complaints are not resolved by the national/provincial system, the PIU will nonetheless remain informed of decisions and reflect in quarterly reports to the World Bank.

**Additional Training:** Each contractor is required to, at all times, have a qualified safety officer on board. If training is required, this will be the contractor's responsibility. The safety officer will provide instructions to contractor staff. PIU will also arrange training to address risks associated with labor influx and will also provide a schedule for training required. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required by PIU, as specified by the contract.

The staff will receive training on the prevention of SEA/SH, codes of conduct, as well as on gender and GBV in general. The PIU will be responsible for (i) training, (ii) implementation, and (iii) supervision of OHS aspects.

It will be a condition in the construction contracts that the contractors give preference to local labor. This entails that wherever possible, unskilled work opportunities should be made available to community members.

## **7. POLICIES AND PROCEDURES**

All project staff and contractors must be informed of the project management policies and processes (s). Contracts must be drafted in conformity with ESS 2 principles and Sindh Labor Laws, and all recruitment processes must be open. Copies must be in Sindhi or Urdu to the greatest extent practicable. Urdu and Sindhi must be used for training sessions and procedure writing. The project team will prepare the following subsequent actions:

### **7.1 Labor Policies and Procedures**

These policies and procedures will be updated and modified, if necessary, after the allocation of the contracts of the different positions of the PIU. As specified in the national labor laws, the employment of project workers will be based on the principles of non-discrimination and equal opportunities. There will be no discrimination with respect to any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion, or termination of employment. The following measures will be followed by contractors and monitored by the PIU with support from Human Resource Department to ensure fair treatment of all employees:

- Recruitment procedures will be transparent, public, non-discriminatory, and open with respect to ethnicity, religion, sexual orientation, disability or gender
- Applications for employment will only be considered if submitted via the official application procedures established by contractors
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them, after which the workers will sign the contract.
- Unskilled labor will be preferentially recruited from the surrounding communities, and settlements.
- Employees will be informed at least two months before their expected release date of the coming termination.
- The contracted workers will not be required to pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Employer.
- Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in two languages, in the national language and the language that is understandable to both parties
- In addition to the written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- It is noted that language related problems are not expected, but if they are, interpretation will be provided for workers as necessary.
- All workers will be 18 years old or above for civil works. This will be a requirement in contracts with construction works contractors.
- Normal working time should not exceed 40 hours per week. With a five-day working week, the duration of daily work is limited by the internal work regulations approved by the employer after prior consultation with the representatives of the workers, in compliance with the established working week duration.

The PIU will inform the World Bank of any significant event (social issues) as soon as possible, but no later than five working days, after the occurrence of the event. Such events include strikes or other workers' demonstrations. The PIU will prepare a report on the event and the corrective measures and subsequently submit it to the World Bank within 30 days of the event.

## **7.2 Occupational Health & Safety**

The KWSSIP PIU is committed to comply with the legislation that relates to the occupational health and safety requirements as stipulated in the main law governing OHS and Sindh Factories Act 2015 Chapter 3 in Sindh as well as other provincial and federal OHS Acts. The Sindh Hazardous Substance Rules of 2014 regulates certain occupations as hazardous and contain special provisions to regulate the working conditions in those occupations. In addition, there are other laws to be complied with dealing with OHS including The Mines Act 1923; Social Security Ordinance 1965; Workmen's Compensation Act 1923; Shop and Establishment Ordinance 1969 and Dock Laborer Act 1934 as well as WB ESS2 and ESS 4. These laws and standards will enable OHS hazards identification and risk elimination through promotion of appropriate skills, knowledge, and attitudes towards hazards.

The PIU will have a designated Occupational and Community Health and Safety Specialist and an Environmental Representative for an agreed period. This specialist must have a minimum bachelor's degree in civil/environmental engineering/environmental sciences and certificate course in OHS (e.g., The National Examination Board in Occupational Safety and Health - NEBOSH) with a minimum of 5 years of experience as OHS professional in construction of infrastructure projects. Extensive knowledge of all OHS legislation, OHS guidelines and standards are required.

It is important that all staff must be given induction training so that they are aware of the hazards specific to the project and its activities. This is in addition to toolbox talks and other training needs identified during project implementation.

The PIU will ensure that all workers irrespective of any category should be provided with appropriate type of protective masks, helmet, overall and safety shoes, and safety goggles, protective clothing as well as other appropriate PPEs as per work job hazard analysis and method statements (such as working on live wires). The PIU and contractors must also ensure appropriate demarcation of workplace and notices for hazardous area where applicable; accident reporting, notification and investigation practices at each workplace required; safety sign and symbols displayed at workplace and ensure availability of first aid box; also identify and service agreement done with specialized hospitals for complicated accidental and health problems as well as specific details will be included in the emergency management plan (**see Annexes III, IV, and V**).

### **Occupational Health & Safety Management Plans (OHSMP)**

Contractors will be required to prepare OHSMP in accordance with OHS standards mentioned in the bidding documents, OHS provisions of ESMP, compliance with the local regulatory requirements, and World Bank EHS Guidelines. All OHSMPs shall have a minimum requirement to include information and details on:

- Reporting and Investigation of Incidents /Illnesses
- Procedure for Waste Management
- Procedure for Housekeeping
- Procedure for Hazard Identification and Risk Assessment
- Training Procedure including Induction training
- Toolbox Talks
- Safe Systems of Work – work at heights, hot work, electrical HT/LT works, Excavation, Confined Spaces (Permits to Work)
- Personal Protective Equipment
- Emergency Response Procedure
- Monthly reporting procedure
- Camp management procedure

- Management of Food and Drinking Water at Campsite(s) and at construction site
- Project Site Security Procedure
- COVID 19 measures procedure
- Internal Auditing Procedure
- Management of visits by WB /AIB, Government agencies
- Storage of fuel, hazardous substances
- Operation and maintenance of heavy equipment and overhead cranes.
- Recruitment procedures will be transparent, public, and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability, or gender.

The Guideline for Policies and Procedures are appended in **Annex II**.

### **7.3 Child Labor and Forced Labor**

To prevent engagement of underage workers, the age employment scheme should be strictly adhered to by parties involved in hiring. The process of hiring Direct Workers should include a proper screening, with age verification to ensure no children are employed in the implementation of the project. Likewise, all contracts must have a provision as to the minimum age requirement and the hiring authority shall keep a registry of all hired workers. Similarly, for primary supply workers and contracted workers, have companies and entities provide a legal undertaking highlighting that they will not indulge in child and forced labor services for activities in general and particularly in association with the project.

### **7.4 Labor Influx & SEA/SH**

All project workers will undergo relevant seminars and training to prevent risks of labor influx or SEA/SH issues. Project workers particularly those coming from other communities will be briefed on the culture and history of the area, allowing them to adapt to the community values and to avoid any conflicts due to the dissimilarities of their cultural backgrounds.

#### **Discrimination and exclusion of Vulnerable groups**

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, terms of employment (including wages and benefits), termination and access to training. This project shall comply with the national labor laws on gender equality in the workplace, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate for men and women workers.

#### **Development of a SEA/SH Action Plan and Mitigation Measures for Risks Related to Gender**

According to the Note on Good practices to combat SEA/SH in the Framework of Financing Investment Projects involving major civil engineering works, all projects, whatever their risk level, should guarantee the minimum actions recommendations for addressing the risks of SEA/SH related issues.

The initial SEA/SH mitigation measures have been developed and included, where these measures may need to be reviewed and further modified in the ESIA/ESMPs.

### **7.5 Labor Disputes over Terms & Conditions of Employment**

Fair, reasonable, and lawful terms and conditions shall be applied in the contractual provisions of all project workers to prevent labor disputes. Moreover, there will be an efficient grievance redress mechanism in place to address any issues that may arise during existence of the

contract. The guidelines provided later in the document shall be strictly observed to avoid disputes over terms and conditions of employment.

All the contractors who will be engaged for the project will be required to produce their grievance procedure as a requirement under the tendering process which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, confidential, adhere to non-retribution practices, and include right to representation. After contractors are engaged, they will be required to produce proof that each worker has been inducted and signed that they have been inducted on the procedure.

## **7.6 Monitoring and Reporting**

**General Monitoring Activities:** Processes for monitoring, assessment and audit will be developed to:

- Document the implementation and effectiveness of management and mitigation measures;
- Assess actual impacts against predicted impacts; and
- Demonstrate compliance with applicable legal and other requirements.

Monitoring will be undertaken for both direct hires (including casual labor) and contract workers.

**Assessments:** The Resident Engineer or Site Supervisor will take a lead in undertaking periodic assessments to determine the degree to which, the commitments outlined in this LMP are being met. This will include camp inspections and monitoring of grievances.

**Audits:** It is envisaged that, the site supervisor or resident engineer may, at its discretion, audit the contractors or suppliers to determine their compliance with this LMP. In addition, they may also, at its discretion, undertake audits of other third-party facilities and providers, as relevant to the Environmental and Social Management Plan. The Independent Environmental and Social Consultant, on behalf of KWSSIP may also be engaged to conduct periodic monitoring reviews of the Project, largely based on the social and environmental controls set out in the Environmental and Social Management Plan.

**Performance indicators:** Performance indicators are used to measure and track performance against the effectiveness of mitigation and control measures described in this LMP. Indicators can be divided into two groups: leading indicators and lagging indicators. Leading indicators predict actions to be taken to prevent a risk from escalating - such as complaints from workers about, for example, the quality of camp food. An example of a lagging indicator would be a work stoppage over camp conditions. General performance indicators may also be relevant, such as training and awareness numbers. Performance indicators must be measurable against a specified target.

**Labor and Working Conditions Performance Indicators:** Performance indicators should be carefully recorded and graphed where relevant for remedial action to reduce potential risks. They will form a key component of monthly reporting by the Resident Engineer or Site Supervisor.

**Non-conformance and corrective action:** The project ESMP alongside provisions in this LMP will be all used for tracking and stewardship of non-conformances identified as part of assessment and audit activities described in this LMP.

**Training and Awareness:** Before the development of a training and awareness program, a needs analysis will be conducted. The needs analysis will be based on requirements of this

LMP. It involves a basic assessment of the knowledge and skills of the people involved in training implementation.

**Internal Reporting:** A periodic report will be compiled to address the labor and working conditions aspects contained in this Plan, including the following for both Consulting Engineer and contractor activities:

Workplace:

- Grievances lodged by type and number, illustrated with graphs. Open grievances by type and number;
- Disciplinary action by type and number;
- Induction training numbers, queries and comments;
- Issues raised by workers' committees and action taken;
- Workforce numbers by local and foreign workers - actual against planned;
- Actual demobilization numbers against planned targets. Incidents around demobilization;
- Industrial relations incidents - stoppages go slows, threats, damage to property, violence;
- Lost hours by category; and
- Absenteeism, sick leave and late arrivals.

Camp:

- Grievances lodged by type and number. Open grievances by type and number;
- Disciplinary action by type and number;
- Induction training numbers, queries and comments;
- Issues raised by camp committees and action taken;
- Camp numbers by local and foreign workers - actual against planned;
- Camp incidents;
- Food or lodging complaints; and
- Recreation activities.

**External Reporting:** Consulting Engineer and its contractors will meet all statutory notification and reporting requirements.

**Disclosure:** Disclosure will be done to enable workers understand information regarding safeguards in the workplace. This will be done during the induction period of the worker. Various tools will be used including Information, education and communication (IEC) materials and Meetings, Induction toolkit (Sexual and gender-based violence, EHS company policies, safety, code of conduct, child protection etc.)

## **7.7 Fatality and Serious Incidents**

In the event of an occupational fatality or serious injury, the PIU shall report to the Bank as soon as becoming aware of such incidents and inform the government authorities (where available) in accordance with national as well as Bank reporting requirements. Corrective actions shall be implemented in response to project-related incidents or accidents. The PIU or, where relevant the consultant, may conduct a root cause analysis for designing and implementing further corrective actions.

## **8. AGE OF EMPLOYMENT**

This Chapter explains the standards and methodology for determining the minimum age of labor for KWSSIP.

### **8.1 Minimum Age for Employment in the Project**

Article 11(3) of the Constitution of Pakistan prohibits the employment of children below the age of 14 years in any factory, mines, or any other hazardous employment. In accordance with this Article, the Employment of Child Act (ECA) 1991 does not permit child labor in the country. The ECA defines a child as a person who has not completed their fourteenth years of age, where it further states that no child shall be employed or permitted to work in any of the occupation set forth in the ECA or any workshop wherein any processes defined in the Act is carried out. The KWSSIP PIU and its contractors will be bound by the ECA to disallow any child labor at the project sites or campsites.

Under the Sindh Factories Act, 2015, no adult employee, defined as a worker who has completed his or her 18<sup>th</sup> year of age, can be required or permitted to work in any establishment in excess of nine hours a day and 48 hours a week. Similarly, no young person under the age of 18, can be required or permitted to work in excess of seven hours a day and 42 hours a week. The Factories Act, which governs the conditions of work of industrial labor, applies to factories, employing ten or more workers.

According to the ESS 2 and the Sindh Prohibition of Employment of Children Act of 2017, no one under the age of 18 may be hired to work at the project site (s). The hiring process must specify how candidates' CNICs will be checked, so that no one under the age of 18 can be hired on site. It is necessary to inspect and confirm the applicant's original CNIC. The contractor(s) and the recruiting agents will be held accountable if any underage workers are discovered to be working on the project site(s). They will be fined and have their contracts terminated.

Under the ILO C138 (Minimum Age Convention, 1973), each Member of the Convention undertakes to pursue a national policy designed to ensure the effective abolition of child labor and to raise progressively the minimum age for admission to employment or work to a level consistent with the fullest physical and mental development of young persons. Article III thereof provides: (a) the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons shall not be less than 18 years; (b) the types of employment or work to which paragraph 1 of this Article applies shall be determined by national laws or regulations or by the competent authority, after consultation with the organizations of employers and workers concerned, where such exist; (c) notwithstanding, the provisions of paragraph 1 of this Article, national laws or regulations or the competent authority may, after consultation with the organizations of employers and workers concerned, where such exist, authorize employment or work as from the age of 16 years on condition that the health, safety, and morals of the young persons concerned are fully protected and that the young persons have received adequate specific instruction or vocational training in the relevant branch of activity.

The Sindh Prohibition of Employment of Children Act of 2017 states that any teenage worker (aged between 14 and 18) hired for training at the site(s) must be kept away from moving machinery and not given any dangerous tasks. Before allocating the task or job to an adolescent worker, a thorough risk evaluation of the assignment must be made.

Contractors will be required to verify and identify the age of all workers. This will require workers to provide official documents, which would include a birth certificate, CNIC, passport, or medical or school record. If a minor under the minimum labor eligible age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the minor in a responsible manner, considering the best interests of the minor.

## **8.2 Age Verification**

Prior to the engagement of labor, age verification must be done and documented. Where available, verify the birthday on official records like a birth certificate, national identification card, or other reliable sources.

## **9. EMPLOYMENT TERMS AND CONDITIONS**

This Chapter defines the employment terms and conditions applicable to the project employees and what shall be mandated in terms of application by the PIU.

### **9.1 General Requirements**

The employment terms and conditions applicable to project employees as set out in the labor rules will apply to project employees who are assigned to work on the Project (Direct Workers). Terms and conditions of part-time workers are determined by their individual contracts.

The contractors' labor management procedure will set out terms and conditions for the contracted and subcontracted workers. These terms and conditions will be in line, at a minimum, with this LMP, the Sindh Factories Act 2015, and specified in the standard contracts to be used by the PIU KWSSIP under the project.

A contract of employment, written in a language known to all parties, shall be executed between the PIU and the direct worker that specifies the following:

- The parties involved, including the name of the worker, age, citizenship, civil status, gender, and address;
- Location of work with regard to the needed services, acceptance of the parties, qualifications of the worker, and attestation that the worker is not related within the third degree of consanguinity or affinity to the hiring authority and/or its representative, and the worker has not been previously dismissed from government service by reason of administrative offense;
- Terms and Conditions of the contract, including the hours and place of work, remuneration payable to the worker, job description, summary of deliverables, duration of contract, procedure for suspension or termination of contract, statement that there is no employer and employee relationship between the contracting parties.

As provided in the Sindh Factories Act, 2015, each worker who has completed a period of 12 months continuous service in a factory shall be allowed, during the subsequent period of twelve months, holidays for a period of fourteen consecutive days. If a worker fails in any one such period of twelve months to take the whole of the holidays allowed to him or her, any holidays not taken by him or her shall be added to the holidays allotted to him or her in the succeeding period of twelve months.

A worker shall be deemed to have completed a period of 12 months continuous service in a factory without considering any interruption in service during those 12 months due to sickness, accident or authorized leave not exceeding 90 days in the aggregate for all three.

### **9.2 Non-Discrimination & Equal Work Opportunities**

Article 19-A of the Constitution imparts the State's obligations aimed at achieving equality in the form of securing the well-being of the people, regardless of sex, caste, creed, or race, by raising their standard of living, by preventing the concentration of wealth and means of production and distribution in the hands of a few to the detriment of general interest and by ensuring equitable adjustment of rights between employers and employees.

The KWSSIP PIU is committed to equal opportunities for all its employees and potential employees where everyone is treated with respect and dignity, where there is equal opportunity for all. All employees under KWSSIP, regardless of their affiliation, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefits

will be on the basis of aptitude and ability. Decisions about pay and benefits, terms and conditions of employment, appraisals, dismissal, or redundancy will be made objectively and without unlawful discrimination. All employees will be helped and encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilized to maximize the efficiency of the organization.

The KWSSIP PIU will ensure that:

- Equality and non-discriminatory policy are adhered to within its own area of responsibility;
- Spread awareness on the equality in employment policy to the attention of the team members;
- Ensure that information on the equality of opportunity is included in all indication processes; and
- Ensure that the team members are available to attend relevant quality training programs (if any)

The PIU is responsible for assuring that equality in employment is effectively communicated to all employees and all those involved with the organization at whatever level of position and for providing guidance where appropriate. It will also, in particular, provide full text and induction on equal opportunities to all new employees; translate this policy into Urdu and any other traditionally spoken languages and send to all relevant involved parties. In addition, upon any significant update, this policy will be presented to all members of staff or at department/office meetings and re-translated to all relevant involved parties.

Each member of staff has a responsibility to:

- Follow any measures introduced to ensure equality of opportunity and prevent discrimination, harassment, or bullying
- Report any discriminatory acts
- Treat others fairly without prejudice
- Promote a work environment where an individual can feel valued and realize their potential whilst encouraging others to do so also

Failure to comply with the policy, procedures and practices outlined below will be considered within the framework of the PIUs disciplinary procedure. The PIUs equal opportunity policy also covers bullying and harassment issues at the workplace and in any work-related setting outside the workplace.

### **9.3 Working Hours**

As per the Sindh Factories Act 2015 (Section 34), the Shops and Establishment Ordinance, 1969 (Section 8) and the Road Transport Ordinance, 1961 (Section 4) are used to determine working hours and any rest time in different industries.

Section 34 of the Factories act states “no adult worker shall be allowed (or required) to work in a factory for more than 48 hours in a week: if the factory is seasonal, 50 hours a week and if the work is of continuous nature, he may work for 56 hours in a week. As for the daily hours, these may not be more than 9 hours a day (in case of seasonal: 10 hours). The working hours of an adolescent (15-18) are 5 hours in a day. The Factories Act is applicable to all areas employing 10 or more workers. The law makes provisions for one weekly holiday and if that is not given, a compensatory holiday must be given as soon as possible.

The Shops and Establishments Ordinance 1969 also limits weekly working hours to 48 hours. The ordinance also covers shops and commercial establishments not regulated by the Factories Act, where it states that any adult worker is required to work overtime, If asked,

where the rate of overtime payment is double the usual pay (Section 47). Overtime is not payable to the contract workers who are employed on a piece rate basis. The normal hours of work for project workers shall not exceed 8 hours a day for 5 days for a total of a 40-hour work week, exclusive of time for meals. Where exigencies of the service require such personnel to work for 6 days or 48 hours, the project workers shall be entitled to a compensatory time off to offset the overtime rendered. No worker shall be allowed to render services beyond the 48-hour overtime.

#### **9.4 Leaves & Weekly Rest**

Each project worker is entitled to a 2-day rest period during weekends (Saturday and Sunday). Workers shall be entitled to a rest day on regular holidays recognized by the province. Each worker is entitled to 10 days casual leave with full pay during a year. Workers are also entitled to 16 days sick leave with half pay (8 days with full pay) in a year. Festival holidays as notified by the provincial government with full pay (usually 10-13) are also allowed. If a worker is required to work on a festival holiday, he will be given one day additional compensatory holiday with full pay and a substitute holiday (300% of usual wages).

#### **9.5 Maternity Leave**

If a worker has completed 12 months of continuous service in a factory, they shall be allowed a paid annual leave of 14 consecutive days. Under the Maternity Benefits Ordinance 1958, leave is also allowed to pregnant women for a period of 12 weeks with full pay. It is unlawful for an employer to dismiss a women worker who is on maternity leave. The qualifying period for getting this leave is 4 months of preceding employment with the employer.

#### **9.6 Remuneration**

The laws relating to fixation and payment of remuneration include the Sindh Payment of Wages Act 2015, the Sindh Minimum Wages Act 2015 and the Sindh Terms of Employment (Standing Orders) Act 2015.

#### **9.7 Workers' Welfare**

The workers' welfare legislation includes Employees Old Age Benefits (EOAB) Act 1976 (with provisions for old age pension, old age grant, invalidity, and widow(er) pension). This Act is applicable to establishments employing five or more workers. Contribution has to be made both by the employer (5% of minimum wages) and employee (1% minimum wages). Employees Social Security Ordinance 1965 (applicable like the EOAB Act) provides benefits to employees in case of sickness, maternity, employment injury or death. The amount in this scheme is contributed only by the employer to workers or their legal heirs in case of death, permanent total disablement, permanent partial disablement, and temporary disablement during working in an establishment. The Standing Orders 1968 also provides for compulsory group insurance against natural death and injury for all the permanency employees in a workplace.

#### **9.8 Termination of Contract**

The contract of employment shall cease at the end of the period stated in the contract. However, the contract may be pre-terminated by the hiring authority due to breach of any provision thereof, breach of trust, loss of confidence, and for reasons detrimental to the interest of the agency, provided that the project worker is informed in writing at least 30 days prior to the effectivity of such termination. Likewise, the project worker may pre-terminate the contract provided that a written notice is submitted to the hiring authority, stating therein the reasons

for the pre-termination, at least 30 days prior to the proposed date of effectivity thereof, and the same has been received, accepted, and approved in writing by the hiring authority.

Industrial and Commercial Employment (Standing Industrial and Commercial Employment (Standing Orders) Ordinance 1968 was enacted to address to the contractual relationship between employer and employee. The ordinance is applicable to establishments employing 20 or more workers. The ordinance classifies workmen in six classes: permanent, probationers, badlis, temporary, apprentices and contract workers (the last category was added in 2006). The legislation requires that workmen should be provided the contract in writing, showing the terms and conditions of his service, at the time of hiring, promotion and transfer. It also requires that the wage rates paid to different categories of workers/work should be posted on the notice boards.

Termination of an employment contract may be either termination simpliciter, which is termination on grounds other than misconduct after a notice (section 12) or termination on account of misconduct (section 15). Notice of termination, for termination simpliciter, is mandatory for permanent employees. A notice of one month must be served before severing the employment relationship or payment of one month's wages in lieu of notice may be provided (Section 12.1). The law also obliges the employer to provide the termination certificate in writing stating the reason behind it. Although there is no specific provision for just cause dismissal, the requirement of written termination letter and section 41 of IRA 2008 which allow the labor court to inquire into the legitimacy of termination provide that there should be bona fide and valid reason for dismissal.

Termination on account of trade union membership and activity is an invalid reason for termination (ILO, 2000). While termination is being done on account of misconduct, worker has still the right of fair hearing. Of the many types of misconduct is "go slow", for which a worker can be fired. Termination on economic reasons/retrenchment has not been focused in law; however, law does provide the procedure of retrenchment (last come, first go) and preference for rehiring of retrenched workmen. In case of laying off the workers, they must also be given due notice or payment in lieu of notice. If the employer wants to close down the whole business or is terminating the employment of 50 or more workers, It must get the prior approval of labor court. An individual whose employment is terminated has first to use internal mechanisms for dispute resolution, however if he is not satisfied with the decision, he may appeal to the labor court. In that case, labor court is authorized to go into all the facts of the case and determine whether the termination was valid and bona fide or not. The above-mentioned ordinance also provides for severance pay/gratuity to be paid (when an employee resigns or his services are terminated other than misconduct) equivalent to 30 days wages for every completed year of service or any part thereof in excess of 6 months (for 20 years of service, this means 90 weeks of severance pay).

## **9.9 Deductions**

No deductions other than those agreed upon in the contract or those prescribed by law or regulations shall be made from a worker's remuneration. The hiring authority is prohibited to demand or accept from the worker any cash payment or gifts in return for admitting such worker to employment or for any other reasons connected with the terms and conditions of employment.

## **9.10 Medical Treatment of Sick & Injured Workers**

Any worker subjected to any illness, injury, or accident which was sustained during the work period shall be transported to the nearest clinic or hospital by the hiring authority or its representative.

## **9.11 Collective Agreements**

The duty to collectively bargain arises only between the “employer” and the “employee”. Where neither party is an “employer” nor “employee” of the other, no such duty would exist. Considering that the terms and conditions provide that no employer-employee relationship shall exist between the contracting parties, there is no duty to bargain collectively.

Collective bargaining has also been called a fundamental right which emanates from article 17(1) of the Constitution. A trade union can move application for determination of Collective Bargaining Agent (CBA) if it has its members not less than one-third of those employed as workmen. However, if more than one union exists in the premises, the registrar of trade unions will conduct a secret ballot election/referendum and will issue the CBA certificate to union securing votes not less than one third of total votes. If none of the union is able to get one third of total votes, a run-off election between the top two unions will be held and the union getting majority votes will be certified as collective bargaining agent. Not every workman employed in the premises is eligible for voting (Section 24.5). When a union is certified as a CBA, no application for (re)determination of CBA can be made for a period of two years except where the registration of trade union/CBA is cancelled. The CBA is entitled to undertake collective bargaining with the employer or employers on matters connected with employment, non-employment, the term of employment or the conditions of work other than matters which relate to the enforcement of any right guaranteed or secured to it or any workman by or under any law, other than this Act , or any award or settlement; represent all or any of the workmen in any proceedings; give notice of, and declare, a strike and nominate representatives of workmen on the Board of Trustees of any welfare institutions or Provident Funds (IRA 2008: Section 24.13).

## **10. GRIEVANCE REDRESSAL MECHANISM**

This Chapter describes the requirements for establishing a grievance redressal mechanism (GRM) to be established for the project workers.

### **10.1 Legislative Requirements**

As per Article 46 of the industrial Relations Ordinance (IRO) 2002, any worker may bring their grievance in respect of any right guaranteed or secured by or under any law or any award or settlement to the notice of the employer in writing, either him or herself or through the shop steward or CBA, within one month of the day on which cause of such grievance arises. The IRO 2002 reduces the delay from three months to one month. Where a worker brings his or her grievance to the notice of the employer, the employer must, within 15 days for the grievance, communicate his or her decision in writing to the worker.

### **10.2 GRM for Project Workers**

For the KWSSIP Project, the PIU and its contractors will establish a separate GRM (or make provisions in the overall GRM) for the project workers to address labor or workplace related concerns consistent with the applicable national and provincial laws and ESS2 before the Project Effectiveness and highlight it in the Project Operations Manual (POM).

Typical grievances that may arise in the workplace include demand for employment, labor wage rates, delays in payment, discontentment with working conditions, labor camp issues, and overall health and safety conditions of the work environment. A GRM structure will be established for project workers (direct workers and contracted/ supply workers) as required under ESS2. Handling of grievances will require objectivity, promptness, and responsiveness' to the needs and concerns of aggrieved workers.

The worker's GRM will also allow for 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. Under ESS2, a worker's GRM will be provided for all project workers, including direct workers, contracted/ supply workers, to raise workplace concerns, including SEA/SH issues at the workplace. Any type of worker who has any complaint or grievance has the right to present it and eventually receive a proper response against it.

According to ESS2, different types of workers may approach the workers' GRM for the following key reasons (amongst many others):

- Demand for employment opportunities
- Labor wage rates and delays in payment of wages
- Disagreements over working conditions
- SEA/SH in the workplace
- Health & Safety concerns in the workplace

The workers' GRM which is different from the project GRM, will leverage existing procedures and systems, and will be established in the early stages of the project, whilst serving throughout project implementation. The workers' GRM will be based on the requirements of the WB's ESS2. Specifically, the workers' GRM will operate according to following key principles:

- It will be made available for all direct and contracted workers (and their organizations, wherever relevant)
- It will be proportionate to the nature and scale and the potential risks and impacts foreseen from the project

- It will be designed to promptly address concerns using an understandable and transparent process that provides timely feedback to those concerned in a language they understand without any backlash
- It will be a free to use system, where complaining workers will not pay any fees to use the worker GRM
- IT will utilize existing grievance systems and experiences. In this context, the worker GRM will leverage HR counselling procedures for direct workers that are available at their respective health ministries and departments, and will ensure HR procedures at contractor's organizations are consistent with the official worker GRM system characterized in this document, which will be further references in their working agreements, and monitored accordingly
- Anonymous grievances are also allowed and facilitated, and will be treated equally as any other grievances, whose origin is known, however, a suitable contact information is a must to be able to communicate responses back
- There will be no discrimination against those who express grievances, and any and all grievances will be treated confidentially
- It does not replace or override requirements to provide workplace processes to report work situations that a project worker believes are not safe or unhealthy
- Workers will be able to raise concerns regarding unsafe or unhealthy working conditions throughout the project
- It will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements

The worker's GRM will contain the following design and procedures:

Information about the existence of the grievance mechanism will be readily available to all project workers through notice boards, the presence of "suggestion/ complaint boxes", including the different methods of communication, redressal timelines, rights of workers.

The complainant should be able to use mobile phone-based applications, and in person centers/ mechanisms for complaint registration and resolution, and a free hotline linked with a call center. The grievance will be addressed through each area of feedback value chain:

- i. Uptake
- ii. Sorting and processing
- iii. Acknowledgement and follow up
- iv. Verification, investigation, and action
- v. Monitoring & Evaluation
- vi. Provision of feedback to the complainant to ensure effectiveness

Grievance handling will be done in a transparent manner, where aggrieved workers will be informed within 10 days of their grievance application, either with a respective solution or with a request of extension.

The aggrieved worker will have the option to refer to a grievance log with key information that will be established by the PIU and quarterly reported upon.

If not satisfied with the outcome of the grievance at the contractor level, the aggrieved party will be able to access the Grievance Redressal Committee (GRC) established at the PIU level, where the GRC will be responsible for the redress mechanism in the areas of labor, environment, and social aspects along with project management.

The mechanism for resolving workers' grievances will be described in the context of staff induction training, which will be provided to all workers.

## **Collective Grievances and Disputes Resulting from the Negotiations of Collective Agreements**

When a trade union is recognized, it is entitled to negotiate on a regular basis with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with them also. The procedures followed in such circumstances are usually contained in the agreement, which states how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiations, and the procedure to deal with issues that are not resolved through consensus. If the dispute is not resolved at the workplace, the parties to the dispute can utilize the dispute resolution mechanisms provided in the labor legislation.

## **Sexual Exploitation and Workplace Sexual Harassment**

A separate GRM (or specific arrangements within existing GRM) will be established specifically for the purpose of confidentially receiving grievances related to SEA/SH. All SEA/SH related complaints, with the survivor's consent, will be referenced to the project identified service provider who will further manage the case in a survivor-centric approach and will report back to the project GBV GRM once the case is solved. In addition, the ESIA/ESMP will identify additional mitigation measures, including the contractors' ESMP or contractors specific LMP, where required. This will include engagement with communities on gender related risks, grievance, and response measures available as identified in the manual.

The PIU will, with support from consultants, identify institutions and service providers who are actively engaging in the prevention of gender-based violence, sexual exploitation, and workplace sexual harassment in order to establish a manual for referencing potential survivors. The PIU and the contractor are usually not equipped to handle complaints or provide relevant services to survivors, but will reference any person to relevant service providers, including health facilities, law enforcement agency's gender unit or others, as relevant using the information on available services.

All concerned responsible staff shall hold regular meetings with project workers to discuss any work-related issues and concerns. Every grievance raised by a worker will be documented with the actions undertaken by the PIU and contractors to address such grievance. The aggrieved worker may raise any issue anonymously through a letter which shall be submitted to their immediate supervisor's office. Any grievances which are left unattended by the contractor can be submitted by the worker to the PIU, in which case, actions shall be taken to resolve the issue. Any labor dispute shall be first resolved through mediation, conciliation, and arbitration, in order to provide an efficient procedure in the settlement of disputes and to promote autonomy and freedom of the parties to make their own arrangements to resolve their grievance.

## **11. CONTRACTOR MANAGEMENT**

The Project Team shall select contractors through a transparent process. It will review the following during the contractor selection process:

- Knowledge gathered through publicly available sources, such as company registers and papers pertaining to alleged infractions of applicable labor laws, such as inspection reports and other documentation from enforcement agencies;
- Business licenses, registrations, permits, and approvals;
- Labor management system documents, such as labor management procedures, that address OHS concerns;
- Identification, credentials, and certifications of labor management, safety, and health employees;
- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations, reactions, recordable occurrences, and accompanying Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and necessary corrective and preventive actions (for example, revised job safety analysis, new or different equipment, skills training, and so forth);
- Accident and fatality records and notifications to authorities/ lending agencies;
- Records of the benefits that employees are legally required to receive and evidence that they have enrolled in the relevant programmes;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of prior agreements with suppliers and contractors that have clauses and terms that are materially consistent with ESS2.

The contract document shall include the contractor's commitment to:

- providing a construction management plan that includes reporting all pertinent project information, including workplace accidents;
- Employing suitably qualified personnel for high risk jobs;
- Taking into account all occupational, safety and health considerations for its workers and at the site(s);
- Provision of first aid facilities;
- Provision of hygienic canteen and rest facilities at the site(s) and in camps (if applicable);
- Provision of PPE commensurate with the nature of job;
- Provision of traffic management plan;
- Conformance of all labor laws and regulations;
- Written code of conduct;
- Emergency response plans;
- Provision of site security plan;
- Labor influx management plan;
- Prohibition of child labor
- Employment of female workers for certain jobs and sexual harassment prevention

## 12. CONTRACTED WORKERS

Based on the requirement in the various sub-projects, the contractors hired will employ workers and labourers based on their level of skills and the needs of the project, where, if agreeable to the PIU, sub-contractors may also be brought onboard. These sub-contractors may supply labourers as per the agreed terms and conditions defined in this document. The same set of requirements and standards shall be applicable on contracted workers as defined throughout the document. The implementation of these mitigation measures shall be overseen by the supervision consultant, where the workers GRM will be available as a corrective mechanism to rectify any issues that may arise.

The number of contracted workers for the different sub-projects under SOP-II have been estimated at this stage under the detailed design that has been carried out, where these numbers are highlighted below:

**Table 12.1 - Estimated No. of Workers for Sub-Projects under SOP-II**

S. No.	Sub-Project	No. of Workers	
		Construction Phase	Operation Phase
1	Malir Basin Wastewater Interceptors & Treatment Plant	600	191
2	Improved Water Supply & Sewerage in Additional Low-Income Communities	250	Not Required
3	Priority Water Networks Rehabilitation & Extensions	545	50
4	Priority Sewer Networks Rehabilitation	700	Not Required
5	Rehabilitation of Existing & Construction of New Filtration Plants	700	948
6	Reducing Energy Consumption at Dhabeji and NEK Pumping Stations	60	Not Required
7	K-IV Augmentation Works	500	Not Required

## **13. COMMUNITY WORKERS**

Community workers are not envisaged to form a part of this project.

## 14. PRIMARY SUPPLY WORKERS

The number and type of primary suppliers will be defined once the contractors define and prepare their work plans and make the corresponding adjustments to the designs to optimize them. The construction work under the Project will require the involvement of primary supplies including construction materials essential for the functions of the proposed infrastructure, such as cement, aggregates, sand, and bitumen.

Some contractors may also be able to produce such construction materials by their workforce. However, where the contractor will source:

- i. Essential Materials
- ii. Directly from Primary Suppliers
- iii. On an ongoing basis, the workers engaged by such primary suppliers that meet all three criteria are deemed “primary supply workers”, as defined in ESS2.

As discussed in Chapter 3 (Key Labor Risks), the OHS risks are also deemed to be generally significant in the construction sector including quarry sites. To address these potential risks, the following measures will be taken:

**Selection of primary suppliers:** When sourcing for primary suppliers, the project will require such suppliers to identify the risk of child labor/ forced labor and serious safety risks associated with the primary supply chain. The PIU and the consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/ assessment. Where appropriate, the Project will be required to include specific requirements on child labor/ forced labor and work safety issues in all purchase orders and contracts with primary suppliers. Monitoring along these lines will be carried out by the PIU and the supervision consultant, through scheduled audits and spot checks to ensure that child and forced labor is not being utilized by the primary supply workers.

**Remedial Process:** If child labor/ forced labor and/or serious safety risks are identified, the PIU and the consultants will require the primary supplier to take the appropriate steps to rectify them. Such mitigation measures will be monitored periodically to assess their effectiveness. Where the mitigation measures are found to be ineffective, the PIU and the consultants will, within reasonable period, shift the project’s primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

The PIU will oversee the procurements of goods and materials requirements under the construction works. Project contractors will not be responsible for procurement and supply of materials and equipment under the same conditions and specifications on ESHS aspects in its contracting agreements.

Potential risks of child labor forced labor, and serious safety issues which may arise in relation to primary suppliers shall be identified in the ESMP/ESIAs to be conducted in relation to each of the sub-projects.

Where there is a significant risk of child labor or forced labor related to primary supply workers, the Project Team will require the primary supplier to identify those risks in relation use of child labor, forced labor. The labor management procedures will set out roles and responsibilities for monitoring primary suppliers.

Where there is a significant risk of serious safety issues related to primary supply workers, the Project Team shall require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. These procedures and mitigation

measures will be reviewed periodically to check their effectiveness. In case the Project Team is unable to control the primary suppliers with respect to their failure to address the safety issues with respect to child labor or forced labor, it may hire those suppliers who comply with requirements of ESS2 and address the risks regarding use of labor or forced labor as identified in the ESMP.

## **Annex I – Template for Worker’s Code of Conduct**

## **Code of Conduct**

I, \_\_\_\_\_, acknowledge that preventing any misconduct as stipulated in this code of conduct, including sexual exploitation and abuse (SEA), sexual harassment (SH), and child abuse/exploitation are important. Any activity, which constitute acts of gross misconduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit any such misconduct will be pursued as appropriate. I agree that while working on this project, I will:

1. Consent to security background check;
2. Treat women, children (persons under the age of 18) and persons with disability with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, birth or other status;
3. Not use language or behavior towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
4. Carry out his/her duties competently and diligently;
5. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
6. maintain a safe working environment including by:
  - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
  - b. wearing required personal protective equipment;
  - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
  - d. following applicable emergency operating procedures.
7. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health;
8. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
9. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
10. Not participate in sexual activity with children/learners—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defense;
11. Not exchange money, employment, goods, or services for sex, with community members including sexual favors or other forms of humiliating, degrading or exploitative behavior;
12. Attend trainings related to HIV and AIDS, SAE/SH, occupational health and any other relevant courses on safety as requested by my employer
13. Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith;
14. Regarding children (under the age of 18):
  - a) Refrain from hiring children for domestic or other labor, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
  - b) Comply with all relevant local legislation, including labor laws in relation to child labor.

15. Refrain from any form of theft for assets and facilities including from surrounding communities.
16. Remain in designated working area during working hours;
17. Refrain from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours;
18. Follow prescribed environmental occupation health and safety standards;
19. Channel grievances through the established grievance redress mechanism.

I understand that the onus is on me to use common sense and avoid actions or behaviors that could be construed as misconduct or breach this code of conduct.

I acknowledge that I have read and understand this Code of Conduct, and the implications have been explained with regard to sanctions on-going employment should I not comply.

Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

For the Employer/Contractor

Signed by: \_\_\_\_\_

Signature: \_\_\_\_\_

1. Date: \_\_\_\_\_

## **Annex II – Guideline for Policies and Procedures**

## **a) Emergency Response Procedure**

### **1.0 PURPOSE**

The purpose of this plan is to:

- 1.1 Provide guidelines for using internal and external resources to effectively and quickly respond to emergencies covered within the Scope of the Emergency Response Plan at the Project Site in order to:
  - Eliminate or minimize injuries to personnel.
  - Protect the Environment.
  - Prevent or minimize damage to Project site and equipment.
- 1.2 Ensure communication of all essential information to the appropriate personnel as quickly as possible.
- 1.3 Identify the responsibilities of site personnel when an emergency occurs.
- 1.4 Identify training required in order to ensure a high level of preparedness at all times.

### **2.0 SCOPE:**

The Emergency Response Plan for KWSSIP has been developed to respond to the following emergencies at the facility:

- Serious fire or explosion
- Bomb threat
- Medical Emergencies.
- Civil unrest
- Earthquake
- Heavy Rains and Floods

### **3.0 RESPONSIBILITY:**

The Project Manager is responsible to establish, implement and maintain the procedure.

- 3.1 All persons designated in this document shall ensure the effective implementation of Emergency Response Plan

### **4.0 DEFINITIONS:**

- 4.1 **Emergency Response Plan** Emergency Response Plan outlines the steps, which should be followed to enable the Company to respond effectively to an emergency. It addresses:

- Emergency Team
- Emergency Notification and Communication Plans.
- Contingency Plans.
- Training Requirements.

- 4.2 **Contingency Plan**

A response plan specially developed for individual emergency scenario (e.g., fire, medical etc.) which is envisioned to occur. Contingency Plans complement an Emergency Response Plan and enable detailed provision to be made for each emergency envisioned.

- 4.3 **Incident**

An unplanned event that results in an injury, fire or explosion, a spill or leak, damage to property, personnel, general public or visitors.

4.4 **Emergency**

Emergency may be defined as a sudden event causing or has the potential to cause serious human injury and/or damage to the company assets and/or environmental degradation of large magnitude.

4.5 **Level 1 Emergency**

An emergency that can be controlled or handled by Internal Resources and concerned personnel and **DOES NOT** require the assistance of the local emergency services.

4.6 **Level 2 Emergency**

This is an emergency that requires assistance from the local emergency services, e.g. KMC. Level 2 emergencies can result from a natural disaster, large fire or a spill.

4.7 **Incident Commander**

The Incident Commander is the person responsible for the overall management of the emergency.

4.8 **Visitor**

For the purposes of this plan, a Visitor is anyone within the site boundaries who is not an employee. This includes suppliers, vendors etc.

**5.0 ORGANIZATION:**

Organogram of Emergency Response for KWSSIP is shown in Annexure II.

5.1 **Incident Commander**

*Purpose:*

To handle and control the Emergency Situation using best available resources

*Functions:*

- He is overall in-charge of any incident/accident at the Project Site and will communicate any incident to the Project Director.

5.2 **Fire Fighting Team**

*Purpose:*

To control fires, smoke and explosion during an emergency

*Functions:*

- Extinguish the fire.
- Control Smoke and Explosion.
- Cordon off affected area and restrict entry of non-concerned people.
- Carry out Rescue and Evacuation of trapped personnel.

5.3 **First Aid Team**

*Purpose:*

To provide Medical Attention to Injured Personnel

*Functions:*

- To provide medical care to injured personnel
- To send the injured personnel to the clinic or hospital as appropriate.
- To accompany the injured personnel to the hospital, as directed by Incident Commander

**6.0 COMMUNICATION RESPONSIBILITIES:**

- 6.1 For a Level 1 emergency Incident Commander shall contact the emergency services in the area like the Fire Brigade.

- 6.2 For a Level 1 emergency, which involves a medical emergency, the Incident Commander shall call ambulance service and advise them of the nature of the emergency during the phone call.
- 6.3 For both Levels of Emergency, Incident Commander shall inform the Project Director immediately.

## **7.0 EVACUATION:**

- 7.1 Upon hearing the fire alarm, visitors and staff who have not been assigned a responsibility in the Emergency Response Plan shall be asked to go to the designated Assembly Point
- 7.2 Once assembled, the Incident Commander shall perform a head count in order to confirm the presence or absence of the employees at the project site.
- 7.3 In case anyone is missing, Incident Commander shall call on their mobile to check where they are located.
- 7.4 Personnel may return to their work places after the emergency is over

## **8.0 CONTINGENCY PLANS:**

### **8.1 Purpose**

Contingency plans have been developed for EMC to provide guidelines for responding to incidents and emergencies that can occur within the facility. Since it is impossible to predict exact conditions during an actual emergency, they are to be used as guidelines for the response and modified as necessary.

8.2 The following Contingency Plans have been developed for KWSSIP:

- *Fire*
- *Bomb threat*
- *Earthquake*
- *Medical Emergencies*
- *Heavy Rains and Flooding*
- *Civil Unrest*

8.3 The Incident Commander is authorized to activate the Contingency Plan for incidents at the office.

8.4 The Emergency Response Team working with led by the Incident commander is responsible for implementing the response defined within the Contingency Plan. It is recognized that the actual response may vary from the Contingency Plan.

8.5 The following general procedures should be considered when implementing an emergency response:

8.5.1 Response should be developed in the following order of priority:

- Rescue of injured or trapped personnel.
- Protection of the environment.
- Protection of KWSSIP assets

## **9.0 DEACTIVATION AND RECOVERY PLAN:**

9.1 Deactivation of Emergency Response Plan

- The Incident Commander is responsible for deactivating the emergency response plan at the end of the emergency.
- He shall make this decision after consulting with the Director and other members of the emergency response teams, as appropriate.

- He will then notify all that the emergency has ended.
- The emergency area will be barricaded to prevent entry by unauthorized personnel.

9.2 Following general actions should be taken by the respective Teams at the conclusion of the emergency:

- Emergencies Involving Fires
- Arrange for fire fighting equipment used during the emergency to be refilled before returning them to their correct location.
- Clean the fire area, after receiving authorization from the Incident Investigation Team Leader.
- Submit Incident Report to Incident Commander with copy to Project Director.

## **10.0 INCIDENT INVESTIGATION:**

10.1 As per the legal requirements, The incident investigation team will investigate all incidents and emergencies, and to develop recommendations to prevent recurrence.

10.2 The Incident Commander shall ensure that the following items of evidence are preserved for use by the investigation team:

- Notes taken about the emergency response by Emergency Response Teams.
- Statements taken immediately after the incident from witnesses to the emergency.
- Within 24 hours of the emergency, Emergency Response Team will investigate the root cause of the accident; identify opportunities to improve. Moreover, suggest any suitable changes in the contingency plan or procedure in light of the evaluation of the incident.

## **11.0 TRAINING:**

11.1 All concerned shall receive initial as well as periodic refresher training in addition to mock drills order to allow them to fulfill their responsibilities during an emergency.

11.2 Training needs be identified and team members should be trained to handle any situation. The training log shall be maintained and regular training in house as well as outside shall be arranged.

11.3 Incident Commander is responsible for ensuring that personnel receive the required training before they are expected to perform their duties, and that they also receive the refresher training at the required interval.

## **12.0 CONTINGENCY PLAN FOR FIRE:**

12.1 When the fire alarm sounds evacuate the affected area and gather at the assembly point

12.2 Incidents Commander will make sure that no employee is left behind at the affected place.

12.3 Fire officer will shut off sources of ignition & electricity.

12.4 Incident Commander will contact the Security In Charge to notify the Fire Brigade, if required.

12.5 The Emergency Response Team will use appropriate firefighting equipment to extinguish the fire; such as:

- For all solids except metals, use Water Type Fire Extinguisher.
- For those articles having Electricity/ Power, use Carbon Dioxide Fire Extinguisher.

- 12.6 Prepare and submit an Incident Report.

### **13.0 CONTINGENCY PLAN FOR EARTHQUAKE**

- 13.1 Evacuate and assemble at the assembly point
- 13.2 Provide first aid in case anyone has been injured by falling materials
- 13.3 Alert emergency services and call for ambulance in case there are many injuries
- 13.4 Ensure that all personnel working at the site especially working on heights have left their places of work
- 13.5 Shut off the electricity and fuel and water connections.
- 13.6 Remain at the assembly point till the earthquake tremors cease.
- 13.7 The site shall be inspected for damage and list prepared of damaged structures and equipment

### **14.0 CONTINGENCY PLAN FOR BOMB THREATS:**

- 14.1 Bomb threat may be received at the Project office via telephone call
- 14.2 The person receiving the call must remain calm and try to extract as much information as possible from the caller regarding the place where the bomb is placed, the size of the bomb etc.
- 14.3 Immediately inform the Incident Commander and arrange for evacuation of personnel from the area(s)
- 14.4 Contact Bomb Disposal Squad for taking necessary action to locate the bomb
- 14.5 All personnel to return to work when the Bomb Disposal Squad clears the area.

### **15.0 CONTINGENCY PLAN FOR MEDICAL EMERGENCIES:**

- 15.1 Any employee injured during work or due to an emergency is to be treated by first aid team and provided first aid till the arrival of ambulance.
- 15.2 In case, the injury is severe, then the person shall be sent to the nearest hospital for further treatment.
- 15.3 Incident Commander shall be notified of medical emergency at once.

### **16.0 CONTINGENCY PLAN FOR HEAVY RAINS AND FLOODING**

- 16.1 If rains have started during the night the security in charge must inform the Project Engineer and wait for further orders
- 16.2 Steps must be taken to cover all the equipment at the project site and remove them to a safe place.
- 16.3 In case rains continue then work is not to proceed till the rains stop
- 16.4 In case of flooding at the site, all equipment is to be removed from the flooded area and kept covered
- 16.5 After the rains have stopped, assessment of damages is to be carried out and report prepared by the Incident Commander and submitted to the Project Director.

## 17.0 CONTINGENCY PLAN FOR CIVIL UNREST

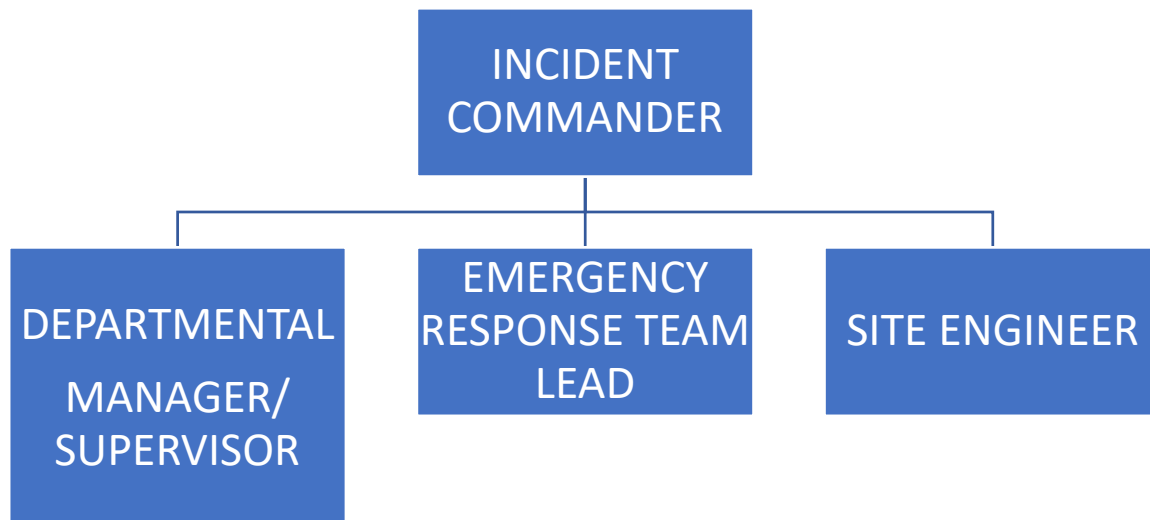
- 17.1 In case there is news of civil unrest, the Security In Charge shall ensure that all gates of the Project Site(s) are closed and secured. Rangers/Police shall be summoned .
- 17.2 No employee shall be allowed out from the site.
- 17.3 When it is ensured that there is no danger of any violent demonstrations in the vicinity of the project site, the gates may be opened and traffic in and out allowed.

### Emergency Contact Numbers

#### Karachi

Name	Number
Karachi Police	15
Fire Brigade	16
Sui Gas	1199
Traffic Police	1915
CPLC	1102
Rangers	1101
Aman Ambulance	1021
Edhi Ambulance	115
Chipa Ambulance	1020
K Electric	118

### ORGANOGRAM FOR EMERGENCY RESPONSE



## **b) Personal Protective Equipment**

### **1. PURPOSE**

The purpose of this procedure is to ensure that Personal Protective Equipment (PPE's) are made available to all project site employees.

The key requirements of this procedure include:

- Identification of areas / tasks requiring PPE's
- Selection and issuance
- Use and maintenance
- Eye protection policy
- Foot protection policy
- Training
- Program evaluation

### **2. SCOPE**

This procedure applies to KWSSIP Project Sites, where risks to health and safety cannot be adequately controlled through engineering and administrative means

### **3. RESPONSIBILITIES**

The Project Manager in co-ordination with Site safety Officer will:

- Co-ordinate the overall Personal Protective Equipment program at the Project Site
- Prepare and update the PPE procedure

The concerned Department Manager / Supervisor will:

- Generate list of PPE's used in his area
- Ensure that PPE is worn correctly
- Ensure that PPE is stored as per procedure
- Ensure that the correct cleaning procedures are carried out
- Inspect PPE at regular intervals
- Initiate disciplinary action if appropriate
- Ensure appropriate warning signs are posted for hazardous activities at the project site
- Maintain inventory of PPE's of his area
- Organise PPE training

### **4. PROCEDURE**

#### **4.1 Identification of Area / Task Requiring PPE**

The concerned Department Manager in co-ordination with Manager EHS / his representative will:

- Identify areas / tasks / processes for which PPE is required
- Ensure that PPE is used as last resort after all other feasible controls have been applied or as an interim measure until more effective controls can be implemented

#### **4.2 Selection and Issue**

The Project Manager in co-ordination with Site Safety Officer will:

- Select appropriate PPE's as per requirement
- Ensure that only the correct PPE is issued

- Ensure that PPE is issued to personnel who know its use
- Ensure that areas where PPE's use is mandatory are demarcated as "PPE Zone" outside the area
- Ensure that signs are placed in appropriate locations to warn staff where PPE's are required

#### **4.3 Mandatory PPE for Project Site**

Helmets and Safety Shoes are to be worn at all times at the Project Site. The helmets and Safety Shoes must be checked on regular basis by the Site Supervisor to ensure they are in good condition.

Other PPE for construction sites are:

Harness, Welding Shields/Goggles, Gloves , Gum Boots, Respiratory Protective Equipment etc. These are to be worn when performing work at heights, welding activities working in wet areas.

#### **4.4 Use and Maintenance**

The Project Supervisor in coordination with the Site Safety Officer will:

- Develop procedures on correct use, storage and maintenance of PPE's
- Ensure that staff require to wear PPE's must be trained on their use
- Ensure that the correct PPE has been issued to the site personnel performing tasks for which it is required and keep a record of the PPE issued to the employees.
- Ensure that the issued PPE is worn correctly
- Ensure that the PPE is properly cleaned and maintained
- Arrange regular inspections of PPE's at appropriate intervals
- Initiate disciplinary action against any person refusing to use issued PPE correctly

#### **4.5 Training**

The concerned Project Manager in co-ordination with Site safety Officer will ensure that concerned personnel receive appropriate training as per EHS training program on:

- How and why PPE was selected
- When PPE is necessary
- Which PPE is necessary
- How to put on, take off, adjust and wear the PPE properly
- The proper-care, maintenance, storage, inspection, use, replacement and disposal of the PPE

The Project Manager will retain the PPE training record with a copy to Manager EHS / his representative

## **c) Operation of Heavy Equipment and Cranes**

### **1. PURPOSE**

The purpose of this procedure is to ensure safety in operation of heavy equipment and overhead cranes.

### **2. SCOPE**

This procedure defines the necessary precautions to be taken for operation of heavy equipment and overhead cranes

### **3. RESPONSIBILITIES**

The Engineering Manager/Site Supervisor will ensure implementation of this procedure,

### **4. PROCEDURE**

#### **4.1 Operation of Heavy Equipment**

- a) All heavy equipment at site is to be checked and certificate of safety is provided by an approved testing company
- b) Vehicular emissions from the equipment are to be tested by an approved testing laboratory to ensure that they comply with the Vehicular Emissions Standards
- c) The operators of the equipment are to be duly trained and have appropriate license to operate the equipment
- d) The area where the equipment is in operation is to be kept clear and no unauthorized personnel allowed to work around that area.
- e) All the safety alarms, lights etc. are to be in working condition at all times.
- f) Faulty equipment is to be removed from service and tagged that it is not to be used.
- g) All equipment is to be regularly checked and maintained .

#### **4.2 Operation of Cranes**

- a) The Project Engineer must ensure that crane operators are trained and hold a valid license to operate the crane
- b) All lifting equipment shall be checked daily to verify equipment is in safe operating condition before using. This check would include brakes, lights, horns, visibility from operator's station, and proper operation of power source for lifting. More detailed inspection of lifting equipment shall be conducted at regular intervals to maintain the equipment in a safe, operable condition. Records of conditions found and repairs made during inspections shall be maintained.
- c) Statutory requirements for annual inspections of lifting equipment shall be observed and records maintained.
- d) Safe working load chart shall be available at site and complied when lifting the loads

- e) No person shall be allowed to ride on the hook of any lifting equipment.
- f) Designated signalman shall be assigned and operation stopped in case operator is unsure of a signal or existence of a hazardous condition.
- g) Area around the crane operation shall be cordoned off and no unauthorised person allowed to work in the area.

## **d) Storage of Fuel and Other Hazardous Substances**

### **1. PURPOSE**

The purpose of this procedure is to provide a guideline for storage of fuel and other hazardous substances

### **2. SCOPE**

This procedure defines the necessary precautions to be taken for fuel storage and storage of other hazardous substances

### **3. RESPONSIBILITIES**

The Engineering Manager/Site Supervisor will ensure implementation of this procedure,

### **4. PROCEDURE**

#### **4.1 Storage of fuel**

- a) All fuel for use in generators is to be stored in aboveground tanks and provided with bunding. The NFPA 30 guidelines are to be followed.
- b) Appropriate fire fighting measures are to be taken in the area where the fuel tank(s) are located.
- c) If more than 5000 Litres of fuel is stored at site then a license from the explosives department is to be obtained.
- d) "FLAMMABLE" "NO SMOKING" signs to be displayed in the fuel storage area

#### **4.2 Storage of Hazardous Substances**

- a) All hazardous/flammable materials are to be stored a segregated area and provided with secondary containment.
- b) Thinner should be stored on separate pallets with secondary containment.
- c) Appropriate fire extinguishers are to be placed in the area

#### **4.3 Inspection of Storage Areas**

The Site Safety Officer shall carry out regular inspections of the fuel storage areas and hazardous materials storage areas

## **e) Procedure for Waste Management**

### **Purpose**

The purpose of this procedure is to ensure proper disposal of waste from activities conducted by or overseen by project site. In addition, this procedure outlines how to prevent discharges from dumping sites at the facility and other locations on grounds, which could cause pollutants to enter sensitive areas.

### **Scope**

These procedures are to ensure the proper handling and legal disposal of all waste from all locations of the project site. This program is an aide to summarize the applicable requirements of many different waste types and regulations but should not be considered all-inclusive of every waste regulation. As new regulations are promulgated and/or other facets of waste become part of this program, updates will be made.

### **Roles and Responsibility**

- Contractors should include stormwater pollution prevention strategies in waste management procedures.
- It should be ensured that contractors implement proper Best Management Practices (BMPs) to prevent stormwater pollution.

### **Procedures**

- All waste receptacles should be leak-tight with tight-fitting lids or covers. Plastic liners can be used to ensure leak tightness.
- Keep lids on dumpsters closed at all times unless adding or removing material.
- Place waste receptacles indoors or under a roof or overhang whenever possible.
- Locate dumpsters on a flat, paved surface and, if possible, install berms or curbs around the storage area to prevent run-on and run-off.
- KWSSIP up around outdoor waste containers regularly.
- Arrange for wastes to be picked up regularly and disposed of at approved disposal facilities.
- Record SEPA approved waste disposal contractor's contact details.
- Never place hazardous materials, liquids or liquid-containing wastes in a dumpster or trash receptacle. If liquid wastes must be disposed in the trash, absorb them with kitty litter or other absorbents before disposal.
- Non-hazardous liquid waste must be disposed in the sanitary sewer (if approved) or transported to a disposal site that will accept that type of wastewater.
- Do not wash out waste containers or dumpsters outdoors unless the wastewater drains to sanitary sewer or wash containers/dumpsters in a wash bay or floor drain that goes to the sanitary sewer.
- When working in the field, place all wastes in appropriate containers near the work site. If no public containers are available, containerize or bag the wastes and bring them back the shop for proper disposal.
- Minimize waste by purchasing recyclable products that have minimal packaging. Recycle cardboard, plastics and paper products as accepted by your local recycling agency.

### **Training**

- Training on Infection Control and Waste Management shall be given to all waste handlers at project site to better manage the waste from "cradle" to "grave".
- Training should include how to recognize and report illegal connections or discharges –annually or bi-annually

### **Record Keeping and Documentation**

- Record of forms for waste disposal should be documented.
- Keep a list of all employees trained in the project site or other location:
- Keep records on all wastes disposed of including: hazardous waste manifests, trash removal statements (bills), receipts or invoices from recyclers

## f) **Procedure for Housekeeping**

### **Purpose**

To provide a procedure for cleaning & sanitization all the areas within KWSSIP Project Site(s).

### **Scope**

This procedure is applicable to all sites of the facility for general cleaning and sanitization in facility premises.

### **Roles and Responsibility**

- For Operation, Housekeeper (Administration department) is responsible.

### **Procedures**

Many workplace hazards can be removed or eliminated through an effective worksite housekeeping routine. This doesn't just include a cleaning routine, but rather is an ongoing process of efficient tidying and safety practices, as following:

#### *Maintenance of a safe work area*

Work area should be monitored at regular intervals throughout the day and clear up. If trip hazards and mess is starting to build up, it must be sorted out.

#### *Access routes clearance*

A safe work area includes access and egress. Any materials/tools/benches etc. should not be kept in the access route in order to clear the way and to minimize any injury.

#### *Safety in Housekeeping*

Safety is essential for every job, and housekeeping has its safety concerns. Some aspects of going over during safety training for housekeepers include:

- Health Safety
  - Housekeepers work with various germs throughout their day. They need to know how to properly wash their hands, use gloves, and other personal protective equipment when doing specific cleaning tasks, and dispose of trash properly.
  - Housekeepers have the potential to be exposed to blood and other various human body fluids, so they must be trained in blood-borne pathogens and know how to safely handle these types of bodily fluids in these various situations.
- Fire Safety
  - In every job, all employees need to know what to do in case a fire occurs in the workplace. Housekeepers must be trained and know what is expected of them to do in case of a fire.

### **Training**

Employees should be trained to properly manage and handle the following:

- Equipment
- Proper Use of Chemicals
- Maintenance
- Laundry and Various Housekeeping Duties
- Safety

### **Record Keeping and Documentation**

Records to be maintained at construction sites play important role in construction activities. It is a document required to prove any construction activity has taken place at site during billing

or any other claims. These records have all the data of various construction activities carried out at site.

- First and foremost, important records to be maintained on site are the working drawings approved by the clients and design engineer, based on which all the construction activities take place on site.
- Time and Progress Charts help in tracking the construction activities from time to time and help in effective planning, scheduling and controlling the construction projects activities. These charts need to be approved from the concerned authorities.
- All the orders given by clients to the contractor's need be maintained with serial numbers, signatures and dates as a work orders book.
- Works diary of a construction project should indicate contract agreement number, name of work, amount of contract, date of commencement of work, date of completion and extension time granted. All the relevant details need be entered daily in the works diary. This diary serves as an authentic record. Following details need to be entered in this diary with due care:
  - Weather at site
  - Important materials brought to site with their approximate quantity
  - Types of transport working at site
  - Types of tools and plants being used at site
  - Important items of works completed and passed on the particular date
  - Visits of VIPs and their remarks if any.
- Following records must also be maintained:
  - Labor Attendance Record and Daily Wages Sheet
  - Tests Results Record
  - Records of Changes, Deviation Orders and Amendments
  - Periodic bills records

### **g) Monthly Reporting Procedure**

#### **Purpose**

This procedure gives recording and reporting guidelines at workplace to report the injuries at facility, recovery progress, and compliance.

#### **Scope**

This guideline is applicable to all works working in the premises of project site. Following aspects are to be reported under scope of this guidance:

- work-related accidents
- specified injuries to workers
- work-related accidents which cause death;
- work-related accidents which cause certain serious injuries (reportable injuries);
- diagnosed cases of certain industrial diseases; and
- certain 'dangerous occurrences' (incidents with the potential to cause harm)

#### **Responsibility**

- It is the responsibility of each individual to report all work-related injuries and/or work-related illnesses immediately to his/her supervisor (no exceptions).
- Project Managers are required to maintain a record of information regarding every reported work-related injury and/or illness on the work-related injury/illness log
- Project Managers are responsible for knowing how to report a work-related Injury or Illness and completing a supervisor's incident/injury report.
- It is the responsibility of the injured/ill individual to submit all work-related documentation provided by a health care provider to their supervisor or facility manager.
- The Project Managers is required to submit a supervisor's incident/injury report for each work-related injury/illness to Project Director and to the regulatory body i.e., Labor Department. Report should be made on the prescribed forms within 24 hours.

#### **Procedure**

##### *Online Reporting*

The appropriate online report form can be appropriately filled and the form will then be submitted directly to the HSE office or the manager of database. A copy for records must be maintained for documentation.

##### *Telephonic Reporting*

All incidents can be also be reported online but a telephone service is also an option for reporting fatal and specified injuries only.

##### *Reporting out of hours*

- Project Manager has an out-of-hours duty officer. Circumstances where Project Manager may need to respond out of hours include:
  - a work-related death or situation where there is a strong likelihood of death following an incident at, or connected with, work;
  - a serious accident at a workplace so that Project Manager can gather details of physical evidence that would be lost with time; and
  - following a major incident at a workplace where the severity of the incident, or the degree of public concern, requires an immediate public statement from either Project Manager or government ministers.

#### **Recordkeeping and Maintenance**

Project Manager must keep a record of:

- any accident, occupational disease or dangerous occurrence which requires reporting;  
and
- any other occupational accident-causing injuries that result in a worker being away from work.

## **h) Camp Management Procedure**

### **Purpose**

The purpose of the plan is to define the actions to manage the workers' onsite accommodation during the construction activities during the KWSSIP Project.

### **Scope**

These guidelines are applicable for health and safety management at the campsite.

### **Roles and Responsibilities**

Principal roles and responsibilities for the implementation of this plan are outlined below:

#### *Construction Contractor & Subcontractors*

- Construction Contractor has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Management Plan. Camp Manager(s) will be appointed in order to manage all workers' issues related to the accommodation.
- Construction Contractor have to ensure the effective implementation of this plan by issuing its own procedures addressing, detailing and customizing specific actions, measures and monitoring activities .
- Contractor's responsibility. The Contractor procedures has to include a description of allocated resources, responsibilities and communication procedures to relevant personnel.

### **Procedure**

#### *Management*

Careful planning and a concern for health, safety and the environment are essential for good project management. Field camps or rented accommodations should provide adequate working, eating and sleeping arrangements for field personnel and should be appropriately equipped to encourage employees to work safely and efficiently. At the same time, camps should make as little impact as possible on the environment.

Project managers have to allow sufficient time to secure the required permits and permissions before sites are opened. The following factors are to be considered:

- Time of residence: Will the camp be in operation for a field season or year-round?
- Duration: Temporary or a permanent establishment
- Size of the camp (at each time of year)
- Accessibility: Transportation access (vehicle, helicopter and fixed wing) may impact the site selection
- Required permits

#### *Audit and Review*

The correct implementation of this Management Plan is verified through internal inspections and audits carried out according to the requirements of the company. The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by Project Department.

Internal auditing will address:

- The correct implementation of this Management Plan;
- The correct development and implementation of Construction Contractor's Procedures;
- The correct and timely implementation of an auditing and review system by the EPC Contractor.

### *Reporting*

Evidences of the implementation of the mitigation actions/measures and related results are collected through inspection and auditing activities. Reporting activities for this management plan is mainly related to:

- Main figures regarding the implementation of Worker's accommodation
- Main figures regarding undesired camp issues
- Collection, aggregation and recording of the data

### *Training*

It should be ensured that employees are trained to do their jobs safely. Training must be related to operating the campsite.

### *First aid*

Make sure that all first aid kits per the requirements of the OSH Act 2017 and OSH Rules 2019 and are replenished as needed. Make sure additional appropriate first aid is available at all times including stretcher(s).

### *Maintenance*

A maintenance schedule should be established for the camp and equipment that includes regular inspections of all generators, pumps, hoses and fittings and other mechanized equipment, including all means of transportation. Maintenance schedules should be followed for water treatment and sewage treatment systems.

### *Documentation*

Records should be maintained for inspections, training, first aid, safety meetings, and equipment maintenance records and communications logs.

### *Forms*

Adequate supply of forms should be made for reporting incidents/accidents, such as required by the jurisdictional Workers' Compensation Board, spill reports, inspection and audit forms, maintenance check forms, etc.

## **Training**

Training should be different on multiple stages, as following:

- Health and Safety During Staff Orientation
- Training During the Camp Season

During training, following aspects must be considered:

- Administration and Operations
- Health, Safety, and Risk Management
- Behavior Management

i) **Management of Food and Drinking Water at Campsite(s) and at Construction Site**

**Purpose**

This guidance provides procedures for balanced, healthy and nutritional meals for field employees. Food-borne illness can, however, KWSSIP through a camp and disable many people at one time. Therefore, hygienic food preparation and handling procedures and safe food storage are critical to maintaining employee health.

**Scope**

These guidelines are applicable for healthy food and safe drinking water at the campsite and at construction site.

**Procedure for Food Safety**

*Food Preparation Safety*

- Cross contamination is one of the most common causes of food-borne illness and occurs when bacteria from raw food (especially meat and poultry) is spread to other foods.
- Cooked food should be stored in freezer if required to be kept for more than four days.
- Use potable (drinking) water only to wash salad greens, fruits, vegetables and any food that will be consumed raw. It is advisable to wash pre-washed produce.
- If possible, use a designated cutting board for meat, poultry and seafood, and a separate board for vegetables and fruits. This way, raw fruits and vegetables will not be accidentally contaminated by raw meats etc. Wash cutting boards with hot soapy water and sanitizing solution after use. Keep raw meat, poultry and seafood separate from all other foods. Store them on the bottom shelf of a refrigerator. Then, leaking packages will not drip onto other foods.
- In case raw meat is to be stored for more than a week then it should must be stored in freezers.
- Wash foods in a bowl, not in a water-filled sink. After washing meat, chicken, or fish, always wash the sink as well as the container, as splashed water may contain contaminating bacteria.
- When cooking meats, poultry or seafood on a grill, place the cooked food in a clean container. Discard marinades after raw items are removed.

*Food storage tips*

- Food handlers should unpack and inspect all food shipments for quality immediately after it arrives. Inspect for quality, freshness, and potential contamination including by vermin.
- After inspection, store it promptly for maximum safety. Proper storage includes both preservation of food quality by refrigeration and prevention of invasion by nuisance animals and insects. Never store food in sleeping tents.
- Store perishable goods in appropriate places – cupboards, refrigerators or freezers.
- Store heavy and bulky items on lower shelves but not necessarily the lowest shelf. Store foods in containers that are insect proof, rodent proof and bear proof, as required. Label the contents.

*Animal and Insect Controls*

Vermin include rats, mice, cockroaches, bedbugs, flies and other noxious animals or insects. Construct camp buildings to exclude vermin as best possible. Adequate steps are to be taken to keep the premises free of vermin and insects by using appropriate fly screens, traps and baits insect sprays.

*Housekeeping*

- Set up the cooking area separate from the sleeping area. The space between these locations should be open with clear visibility if bears are a risk.
- Restrict food to the kitchen and dining areas; no food should be permitted in sleeping or work areas to control vermin (or bears).
- Set up handwashing facilities so workers can wash before meals. Workers should not wear dirty work clothes and boots in the kitchen and eating areas.
- Projects should have a policy stating that employees must not feed wildlife. Feeding wildlife encourages animals to become human habituated and food conditioned. Some carry life-threatening diseases such as rabies and plague.
- Camps should have an emergency lighting system in the kitchen area in the event of a power failure.

#### Health Surveillance of Kitchen Staff

- Kitchen staff must report to supervisor if they are suffering from fever, cold or diarrhea and they should not be allowed to work
- Annual health surveillance of kitchen staff is to be carried out and they are vaccinated against hepatitis, COVID 19, cholera etc.

#### **Procedure for Drinking Water Safety**

The primary risks associated with drinking water are disease-bearing organisms, turbidity and the presence of toxic chemicals or sewage that may contaminate drinking water. These are worldwide issues, and water in any locality and in any climate or terrain may be affected by one or more of these factors.

Determine the quantity of drinking water required for the camp. Consider the factors:

- whether the camp is temporary or permanent,
- number of employees,
- the season,
- type of activities at the Project Site
- existing and future requirements (showers, clothes washers, stoves, refrigerators, freezers) of the camp or project.

## **j) Project Site Security Procedure**

### **Purpose**

To detail the General Security Requirements and Procedures for persons entering the site and to manage the onsite security to prevent any harm to employees and overall management.

### **Scope**

Site Security Team ensures a high level of awareness for security measures implemented for general site access and for the facility amongst all staff is of critical importance not only for the safety of project staff and equipment at site. Measures to prevent any terrorist activities are to be ensured at all times.

### **Roles and Responsibility**

- Site Security Team ensures the followings:
  - Local government and site policy requirements for the handling of controlled substances;
  - Prohibition of use of arms at site except for the authorized security staff
  - Prohibition of use of alcohol and drugs at site
  - Prohibition of smoking at site except in designated smoking areas
  - Prohibition of any violent behavior at site by the employees
  - Compliance with site security guidelines of KWSSIP
  - Control of access to areas where contamination may result from unauthorized or untrained entry;
  - Control of access to areas containing Hazardous Chemicals;
  - Control and access to areas where project related documentation and other records are stored as well to equipment storage areas.

### **Procedures and Rules**

- Site Entry Rules
  - The following business rules apply for access to the facility:
  - Entry into the facility premises is 'Restricted' to site employees and/or Approved contractors.
  - All visitors to site are to be provided with Induction Training including emergency procedures and fire assembly point,
  - Visitors and un-approved contractors are 'Not' permitted entry into the site building unless accompanied by a permanent staff member.
  - It is the responsibility of the hosting site staff member to remain with the visitors or contractors for the duration of their visit, whilst inside the project site.
- Security Guard
  - The Security Guard must verify identity of the visitor and receive approval from the site authorities before allowing access
  - Security Guard accompanies the person into and out of the site for the emergency or to retrieve any personal belongings
- Multiple Duty Shifts
  - Site security policy is that any person remaining at the project site in all shifts must report his presence at the site to the Project Manager.
- Overtime
  - Work staff may work overtime only at defined shift timings.
- Terminated Employees
  - Managers must ensure that the ID badge and any facility keys held by the terminated employee are collected and returned to the Security Management team before the employee leaves the site.
- Contractors and Visitors

- All visitors and contractors must produce photo identification and be signed into the site visitor's book at the security gatehouse.
- Visitors and contractors will be issued a visitors' badge and must display the badge at all times, whilst on the site.
- Security will ask visitors / contractors to wait at the Security or Reception area for collection by the nominated site contact person before continuing on inside the site.
- Building Alarms and Security Lighting
  - The Manufacturing Building is protected by alarm systems.
  - Defective external building lighting and essential walkway / corridor lighting should be reported immediately and not be isolated for any reason without prior consultation with the to the Facilities Manager.
- Fire and Security Surveillance Schedules
  - At all times and especially when the site is un-occupied or during the evenings
  - Security Officers on duty are required to visually inspect / check defined patrol areas.
  - The areas are defined by the patrol electronic button system to enable reporting of patrols to the security management team.
  - The inspection / patrol should check for:
    - Ensure that there are no signs of fire present in the building;
    - Ensure that all entry, exit and emergency exit doors are secure;
    - Check for signs of forced entry or fraudulent activity.
  - If a Fire is Detected, the Security Guards are to initiate emergency procedures immediately.
- Parking of Vehicles
  - Vehicles should be parked only at the defined area of parking.
  - The guard should help the employees in proper parking in ready to move position.
- Monitoring the exit of employees
  - The guard should monitor the exit of employees at end of the day's work and keep a check that all employees are mentioning the correct exit time.
  - Ensure that the main gate is locked after everyone has left the premises.
  - The extn phone is put on the cradle for charging overnight.

## **Training**

Listed below are suggested mandatory trainings for applicable staff functions:

- Data Security, Privacy and Confidentiality
- Interaction with regulatory authorities and lending authorities viz World Bank and AIB personnel
- Emergency Response Plan

## **Record Keeping and Documentation**

It is the responsibility of the Project Manager to ensure trainings are completed and logs archived. These trainings will be recorded and kept in the project file and employment history and will be made available for audit purposes at any time.

## k) COVID 19 Measures Procedure

### Purpose

This procedure is intended for planning purposes. Employers and workers should use this planning guidance to help identify risk levels in workplace settings and to determine any appropriate control measures to implement. Additional guidance may be needed as COVID-19 outbreak conditions change, including as new information about the virus, its transmission, and impacts, becomes available.

### Scope

This planning guidance for COVID-19 based on traditional infection prevention and industrial hygiene practices. It focuses on the need for employers to implement engineering, administrative, and work practice controls and personal protective equipment (PPE), as well as considerations for doing so.

### Procedure

#### *Develop an Infectious Disease Preparedness and Response Plan*

- Follow federal and state, local, tribal, and/or territorial recommendations regarding development of contingency plans for situations that may arise as a result of outbreaks
- Plans should consider and address the level(s) of risk associated with various worksites and job tasks workers perform at those sites. Such considerations may include:
  - Where, how, and to what sources of SARS-CoV-2 might workers be exposed
  - Non-occupational risk factors at home and in community Settings
  - Workers' individual risk factors (e.g., older age; presence of chronic medical conditions, including immunocompromising conditions; pregnancy).
  - Controls necessary to address those risk

#### *Prepare to Implement Basic Infection Prevention Measures*

- For most employers, protecting workers will depend on emphasizing basic infection prevention measures. As appropriate, all employers should implement good hygiene and infection control practices, including:
  - Promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol.
  - Encourage workers to stay home if they are sick.
  - Encourage respiratory etiquette, including covering coughs and sneezes.

#### *Develop Policies and Procedures for Prompt Identification and Isolation of Sick People*

- Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others at a worksite.
- Employers should inform and encourage employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure.
- Employers should develop policies and procedures for employees to report when they are sick or experiencing symptoms of COVID-19

#### *Develop, Implement, and Communicate about Workplace Flexibilities and Protections*

- Actively encourage sick employees to stay home. Ensure that sick leave policies are flexible and consistent with public health guidance and that employees are aware
- of these policies.
- Talk with companies that provide your business with contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

- Maintain flexible policies that permit employees to stay home to care for a sick family member.

#### *Implement Workplace Controls*

Occupational safety and health professionals use a framework called the “hierarchy of controls” to select ways of controlling workplace hazards. In other words, the best way to control a hazard is to systematically remove it from the workplace, rather than relying on workers to reduce their exposure.

- Engineering Controls
- Administrative Controls
- Safe Work Practices
- Personal Protective Equipment (PPE)
- Follow Existing NCOG Guidelines

#### *Food Preparation and Handling at Work Premises*

- Food handlers should wear masks and gloves during food preparation and handling activities.
- Food handlers must wash their hands prior to glove use and after gloves are removed. The gloves must be replaced and hands washed, after any suspected contamination including sneezing, touching the face, or contact with frequently touched surfaces.
- Food handlers who are sick or develop symptoms of COVID-19 should be granted sick leave
- Food should be protected from contamination at all times e.g., using guards or coverings for food and utensils.
- Clean and sanitize all utensils and equipment regularly

### **Roles and Responsibility**

Following initiative and responsibilities should be managed by team leader:

- Establishing a Safety and Health Program
- Compliance Assistance Specialists
- On-Site Safety and Health Consultation Services
- Cooperative Programs
- Strategic Partnerships and Alliances
- Voluntary Protection Programs (VPP)

### **Training**

All employees must be imparted training on the following:

- Signs, symptoms and modes of transmission of COVID-19
- General hygiene
- Reporting procedure for illness
- Personal and workplace cleaning and disinfection procedures
- Use of face masks (including cloth face covers)
- Maintenance of social distancing (Including use of technology to promote social distancing e.g., telework and virtual meetings)
- Proper use of PPE
- Safe work practices
- Stress management

### **Recordkeeping and Maintenance**

COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are true:

- The case is a confirmed case of COVID-19;
- The case is work-related; and
- The case involves one or more of the general recording criteria e.g., medical treatment beyond first aid, days away from work.

**I) Procedure for External Visits**

**Purpose**

The purpose of this procedure is to ensure that visits by regulatory authorities and lending agencies are conducted with due protocols.

**SCOPE**

This procedure is applicable for visits by external agencies to all KWSSIP Project Sites.

**RESPONSIBILITIES**

The Project Manager will be responsible for overall coordination of visit to the Project Site(s) by regulatory agencies – Labor Department, Environmental Protection Agency and lending agencies – World Bank and Asian Infrastructure Investment Bank.

**PROCEDURE**

**SCHEDULED VISITS**

**Visit /Audits by World Bank**

- a) World Bank auditors conduct visits of Project Site(s) to check that the project is being managed in compliance with the requirements of the World Bank Environmental and Social Framework and related Standards.
- b) The Project Manager must ensure that all necessary documentation is available and up to date at the Project Site.
- c) The observations by the World Bank auditors are to be noted and action plans prepared on receipt of the audit report.

**Visit by Regulatory Agencies**

- a) Such visits may be scheduled or impromptu or visit after receipt of accident report.
- b) The Project Manager must meet the regulatory agency personnel or delegate a supervisor to conduct the visit.
- c) All required documentation must be shared with the regulatory personnel.
- d) The observations made during the visit are to be noted and compliance ensured on receipt of the report.
- e) Compliance report shall be prepared and sent to the concerned regulatory agency.

**m) Procedure for Internal Audits**

**Purpose**

The purpose of this procedure is to have a defined procedure in place for conducting EHS Audits (inspections, Self-Audits) as per agreed schedule against the Labor Management Plan, Local Regulatory Requirements, and World Bank Standard ESS2 and Guidance Note

**SCOPE**

This procedure is applicable to all KWSSIP Project Sites.

**RESPONSIBILITIES**

The Project Manager will be responsible for overall coordination of KWSSIP audits at Project Sites. The Project Manager will be responsible of issuing internal audit report within two weeks of the audit followed by the audit action plan within one month of the audit to all concerned. The internal audit report compliance status will be discussed in the Site Monthly Project Committee Meetings.

Department Manager / Supervisor will be responsible for carrying out H&S Audit of their respective areas quarterly (attachment 03). The findings of inspections will be discussed in the Monthly Project Committee Meeting.

**PROCEDURE**

**1.1 AUDIT SCHEDULE**

- Internal H&S Audits of the Project Sites are to be conducted quarterly as per Internal audit schedule.
- The audit schedule will be approved by the Director Projects & and a copy is to be distributed to all concerned.

**1.2 AUDIT TEAM**

Following will be the internal audit team members at respective Sites:

- Project Manager/ Supervisor
- Engineering Manager /Supervisor
- Site Safety Officer
- Occupational Health Physician / Technician (if required)

**1.3 EHS INSPECTIONS**

- Department/Area inspections will be carried out by the Project Supervisor using the checklist (attachment 03) every week. The purpose is to evaluate the physical H&S conditions / requirements at the workplace.

**1.4 AUDIT INITIATION**

The internal EHS audit schedule will be conveyed one week prior to the audit to the concerned personnel.

**Attachment 01**  
**INTERNAL H&S AUDIT REPORT**

Area:

S #	Observation	Recommendations

**Attachment 02**  
**INTERNAL H& S AUDIT ACTION PLAN**

S #	Recommendation	Action Required	Action By	Target Date	Status Comments /

Department / Area : \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

Conducted by: \_\_\_\_\_

**Attachment 03**

Note: Area inspections to be carried out every week

**PROJECT SELF-INSPECTION REPORT**

S #	Description	Observation Required / Action	Responsibility	Target Date	Comments
1.	<b>General House-keeping</b> Area / Dust				
2.	<b>Flooring</b> Surface Condition				
3.	<b>Ventilation</b> Air Conditioning				
4.	<b>Lighting</b> Mounting Bulbs & Shades				
5.	<b>Electrical</b> Switch Boards / Wiring				
6.	<b>Work Station</b> Table, Chair, Stools, Platforms				
7.	<b>Machinery / Equipment</b> Positioning / Guarding/Condition				
8.	<b>Waste Management</b> Disposal Procedure / Record				
9.	<b>First - Aid</b> First-aid Box Items, Eye-Wash Station Record				
10.	<b>Personal Protective Equipment</b> Required PPE's in Use/condition				
11.	<b>Accident / Incident and Near Miss</b>				

S #	Description	Observation Required / Action	Responsibility	Target Date	Comments
	Reporting and Records				
12.	<b>Lifting Devices</b> Cranes, Pallet Trolleys, Fork Lifters etc.				
13.	<b>Ladders &amp; Platforms</b> Condition				
14.	<b>Material Storage</b> Fuel Storage, Other materials storage areas				
15.	<b>Emergency Exits/ Assembly Point</b> Exit Passage				
16.	<b>Safety Signboards</b> Displayed in areas				
17.	<b>Fire Extinguishers</b> Checked				

**General Remarks**