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Republic of Sudan

Labor Management Procedures (LMPs)

Sudan Family Support Project (SFSP)

Parent Project (P173521) & Additional Financing (P176154)

The World Bank

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Table of Content

1. Introduction ***1***
1.2. The Sudan Family Support Project (Including Additional Financing) 1
1.3. Labor Management Procedures 5
1.4. Rationale of the Labor Management Procedures 5

2. Overview of Labor Use on the Project ***6***
2.1. Numbers and characteristics 6
2.2. Timing of labor requirements 9

3. Assessment of Key Potential Labor Risks ***13***

4. Overview of Labor Legislation: Terms and Conditions ***17***
4.1. International conventions 17
4.2. National labor legislations 17

5. Overview of Labor Legislation: Occupational Health and Safety ***21***
5.1. The National Health Policy 21
5.2. The Labor Code 22
5.3. Other Regulations 24

6. Responsible Staff ***24***

7. Policies and Procedures ***26***

8. Age of Employment ***29***

9. Terms and Conditions ***30***

10. Grievance Mechanism ***31***
10.1. Grievance Mechanism Description 31
10.2. Procedures for Complaining 33
10.3. Capacity Building for Worker GRM's Responsible Staff 34
10.4. Promotion of the worker GRM 35
10.5. World Bank Grievance Redress System 35

11. Contractor Management ***35***
11.1. Selecting Contractors 35
11.2. Managing and Monitoring Performance 36
11.3. Accessing Worker GRM 37

12. Community Workers ***37***
12.1. Terms and Conditions 37
12.2. Occupational health and safety 38
12.3. GRM 39

13. References ***40***

Annex I – Draft Worker Code of Conduct ***41***

List of Tables

Table 1: Types and number estimates of the Project workforce 7
Table 2: Initial labor schedule throughout project life cycle 10
Table 3: Annual Leave by Scale and Categories 19

List of Figures

Figure 1: Worker GRM Value Chain 33

List of Abbreviations and Acronyms

AF	Additional Financing
AfDB	African Development Bank
CDAs	Community Development Associations
CSOs	Civil Society Organizations
DEA	Digital Economy Agency
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESSs	Environmental and Social Standards
FM	Financial Management
GBV	Gender Based Violence
GoS	Government of Sudan
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HH	Household
HR	Human Resources
ICT	Information and Communications Technology
ID	Identification Document
IDPs	Internally Displaced Persons
ILO	International Labor Organization
IMF	International Monetary Fund
IT	Information Technology
LMPs	Labor Management Procedures
M&E	Monitoring and Evaluation
MIS	Management Information System
MoFEP	Ministry of Finance and Economic Planning
MOI	Ministry of Interior
MoLSD	Ministry of Labor and Social Development
NCR	National Civil Registry
NGOs	Non-Governmental Organizations
NN	National Number
OHS	Occupational Health and Safety
PDO	Project Development Objective
PIU	Project Implementation Unit
SDG	Sudanese Pound
SEA	Sexual Exploitation and Abuse
SFSP	Sudan Family Support Program
SH	Sexual Harassment
SSN	Social Safety Nets
UN	United Nations
WB	World Bank
WFP	World Food Program

1. Introduction

The Government of Sudan (GoS) is responding to urgent needs to stabilize the economy and begin a long process of clearing arrears to the World Bank (WB), International Monetary Fund (IMF), and African Development Bank (AfDB) as part of the Sudan's larger macroeconomic stabilization and integration. These measures are expected to include exchange rate liberalization/unification and reallocation of public resources away from commodity subsidies, tax exemptions, towards social and development needs. These fiscal adjustments are expected to contribute to furthering an already deteriorating economic situation in Sudan which has negatively impacted vulnerable people's abilities to cover basic needs. These challenges facing households are compounded by the economic shutdown recently imposed to mitigate the effects of the Corona Virus pandemic (COVID-19) in some regions of Sudan.

Accordingly, the GoS has requested support from the donor community to establish the Sudan Family Support Program (SFSP) to provide cash transfers to 80 percent of the population, i.e., to about 32.5 million individuals, with an annual cost of US $1.9 billion. The GoS will contribute its own budget to the SFSP, particularly as the program enters later phases and transitions to the longer- term support to permanent Social Safety Nets (SSN).

1.2. The Sudan Family Support Project (Including Additional Financing)

The government program is to provide cash transfers of $5 per person per month to approximately 80 percent of the population, i.e. 32.5 million people for an annual cost of $1,950 million. The program scale-up is expected to start following a pilot testing period that began in July 2020. The pilot targeting twenty thousand beneficiaries is supported by WFP. Based on expected external resource flows, the program will scale up in phases. The first will build on the lessons from the pilot and support the development of building blocks necessary for establishment of a more effective Social Safety Net (SSN) System in Sudan. Specific focus during this phase is on transforming the existing institutional and administrative structures to consolidate permanent institutional arrangements in order to design, implement and monitor the SSN as well as support informed decision making in the context of the national social protection framework.

The first states and subsequent scale up consider issues of; (i) poverty head count; (ii) existing implementation capacity of safety nets programs; (ii) payment infrastructure and (iv) presence or absence of UN agencies in those states and (v) rural/urban consideration or a combination of all these factors. Based on the external resource flows, including the first Additional Fund (AF), the design of the second phase will start immediately after the delivery of the first phase.

The Project's Development Objective (PDO), including its additional financing, is to assist the GoS to effectively provide cash transfers to the targeted population to mitigate the effects of the expected economic stabilization. To this end, the Project includes three components:

Component 1: Provision of Cash Transfers

The project will finance cash transfers to selected families in the states of Khartoum, Red Sea, South Darfur, and Kassala, as a first phase. With a fee of 3.5% to Payment Service Providers (PSPs), there are enough resources in the project to allow SFSP Phase 1 to provide transfers to 11.3 million individuals in 2 million families for six months. With the addition of the World Food Program (WFP) covering

617,000 families, a total of 11.8 million people will be covered in these states. This would total 2.1 million families for Phase 1. The project will provide cash transfers of US$5 per person per month for a total cost of US$350 million. Contingent on additional resources becoming available, the program ramp-up is expected to reach 80%of the population by September 2021. The total families benefit levels will be calculated based on the number of family members (US$5 for each member of the family each month). After economic stabilization and fiscal rebalancing measures are undertaken by the GoS, financing using domestic revenues would contribute to the longer-term sustainable SSN from 2022 onward.

The project will contribute to a sustainable SSN system that links to the NCR system and administrative databases, payment, and Grievance Redress Mechanism (GRM), among others. After mitigating the expected effects of economic stabilization, these administrative building blocks will benefit the Digital Economy Agency (DEA) and MoLSD, the latter of which will have long-term responsibility for the permanent SSN. After a year, general transfers to families will end and selected families will be referred to the expanded permanent safety net targeted at those most in need. This component will also finance service fees to expand the participation of electronic and mobile money, banking fees, or other fees of private payment providers.

Component 2: Establish Delivery Systems and Build Institutional Capacity

Activities under this component strengthen the Government's institutional capacity to manage and implement the program.

Sub-component 2.1: Registration and Delivery Systems

Under this sub-component, the project will support the following:

Outreach and communication: this will include developing a communication strategy that applies a participatory approach, which aims to develop two-way communications that would become a key opportunity to build trust into the core of the SFSP. The communication interventions and messages, on another hand, will be designed to meet the requirements of the running phase and prepare for planned rollout. To manage any risk of social tension, the program will work with a national advocacy group that will play a key role in explaining and convincing states of the second and third phases with the program design and modality. Additionally, the project will work with Civil Society Organization (CSOs) and Non-Governmental Organizations (NGOs) to enhance community engagement and track their discourse and feedback.

Enrollment: the family is the unit beneficiary, thus, this component will empower female enrollment in the program, as one family member beneficiary, in addition to the male head, after careful review of gender and GBV issues on a state-by-state basis. Inclusion of women will be augmented through digital payments and having a family joint bank account. The NCR will verify family information through existing data and through a subscriber identification module. People in other locations will be able to apply for the program via an unstructured supplementary service data interface, where beneficiary will provide their IDs or through giving them temporary program IDs for those without a national number. All operations will be done consistent with COVID-19 standard operating procedures.

Payment delivery: payments will be made to bank accounts or to mobile money on monthly basis (up to 12 months in total). The project will leverage current government-to-person financial management ecosystem and will contract with payment service providers (performance based contracts). The

government will allow access to alert payment difficulties free of charge. In districts where digital payment is not an option, the program will establish payment service points. This will include Sudapost offices and temporary cash-out points through schools or other physical service points as well as other cash management service agents which will be identified at the district level. the MoFEP will set options of introducing payment authentication through cash cards, where feasible, at Sudapost or other private service agents where offline payments can be supported in more remote non-digital payment locations. Additionally, payment in remote non-accessible areas may leverage WFP's presence and access, and the list of beneficiaries will be generated and validated by the SFSP. Beneficiaries will be asked to join a financial awareness sessions and review literature on available payment providers in their district. To minimize enrollment barriers, a behavioral science lens may be applied to identify challenges of women and other beneficiaries, and inform communications and/or design elements. This component will also support the payment system's list generation, enrollment, and reconciliation in conjunction with the program's MIS and digital delivery platform, including collection, storage, use, and processing of personal data of the SFSP.

Grievance Redress and Social Accountability: the project will develop a project-specific GRM suitable to address gender based violence (GBV) related issues in early phases of implementation to provide an avenue for complaints and updates regarding registration and enrollment, payments, and other operational matters. The GRM would include mobile phone-based applications, and in-person centers for complaint registration and resolution, and a free hotline linked with a call center. The GRM would address each area of the feedback value chain: (a) uptake; (b) sort and process; (b) acknowledge and follow up; (d) verify, investigate, and act; (e) monitor and evaluate; and (f) provide feedback to the complainant to ensure effectiveness. A Stakeholder Engagement Plan (SEP), the subject of this document, has been initiated, through which the project team will communicate with stakeholders and will include a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The stakeholder consultation will include participatory citizen engagement practices to ensure accountability, which may include citizen report cards, virtual town halls, and engagement of community development associations (CDAs) and the NGO sector for reporting. During the COVID-19 pandemic, the GRM will ensure that social distancing measures are in place for meetings, investigation of grievances, monitoring of existing grievances and public information mechanisms, and the GRM's need to direct any health and COVID-19-related queries to the relevant organization. The project will support the extending of foundational social protection systems to communities including encouraging the establishment of beneficiary associations to facilitate sharing of information and mitigating the risk of fraud and corruption and GRM. The project will also finance community-level facilitators to augment existing local-level capacities and support implementation of social accountability mechanisms.

Sub-component 2.2: Supporting systems:

MIS and IT investments for delivery of benefits: A core element of the MIS will be the social registry which verify data against the NCR and pull limited demographic data from other administrative data sets (for example, for eligibility determination)—all of which will be carried out with the consent of and notification to beneficiaries. The implementation of the SFSP includes infrastructure upgrade at the federal level for various agencies involved n the database, as well as it includes deployment of hardware infrastructure and establishment of network connectivity at the state and locality level. During the pilot stage, interim IT hardware and software solutions will be employed to support the pilot and some ramp-up as the program's design of a social registry, intake form, decision notification, and other program MIS modules are developed. Hands-on customized technical support will be provided during pilot stage

(with help from WFP). However, the enterprise MIS would be developed in parallel to the piloting and would be used as a permanent solution and for the national rollout of the SFSP.

National Civil Registry Enhancement: this will aim to enhance the Sudan's broader digital transformation. For the SFSP in particular, NCR will be scaled up by (a) supporting operational costs for registration catch-up campaigns in geographic areas with low levels of National Number (NN) coverage (especially in conflict-affected and remote areas, and (b) supporting reforms to laws and procedures to permit the lawful sharing of NCR data and mobile data for the SFSP, establish sound governance and institutional arrangements, mitigate barriers to access, and streamline registration and update processes, with particular emphasis on removing the legal barriers which may confer a prominent role on men, in their capacity of heads of families (or paterfamilias), in establishing civil registry records for women in their households. Additionally, the component will improve the capacity and resilience of the NCR by enhancing existing data center and software for registration and verification, establishing a disaster data recovery and network, information, and cybersecurity, as well as supporting a data protection law.

Enabling Legal Framework: the project will finance activities that will strengthen laws on the use of existing NCR and mobile data. The aim is to build trust in collection, management, use and disclosure of personal information. This in return, would help increase transparency and would enable individuals control their personal data. Additionally, the component will develop new institutional arrangements to provide independent oversight, transparency and accountability in terms of the application of data protection principles.

Component 3: Support Project Management, Monitoring and Evaluation and Learning

Coordination, project management and establishment of DEA: This component would support coordination and project management activities necessary for the smooth functioning of the project, including the establishment of the Project Implementation Unit (PIU). The activities supported would include the 'soft' establishment costs of the DEA, day-to-day operational management, institutional setup, and donor coordination by the PIU and DEA. The component would also invest in establishing the SFSP beneficiary database, necessary hardware and software, internet connectivity, and IT infrastructure at the national and local levels. This component will also support the coordination and local-level capacity-building process of the NCR, the PIU, DEA, and MoLSD. The training will focus on the effective coordination aspects between the different stakeholders as well as the strengthened collaboration with the beneficiary associations. This will include hiring of local and international experts in key training areas as required. Trainings will cover areas related to the SSN delivery system: communication, targeting, information systems, enrollment, payment, M&E, and GRMs. Operational skills will include areas related to financial management (FM), procurement, gender, the application of behavioral science, environment and social safeguards, and other areas to be identified after conducting a needs assessment.

Monitoring and Evaluation, and Learning: The component will support strong monitoring practices to ensure expansion of coverage and delivery of payments in accordance to the program's results indicators to achieve its intended outcomes. The component would support the development of social accountability and citizen engagement mechanisms with the support of local-level institutions including CDAs and NGOs. The component will also finance evaluations during the pilot stage to inform the program rollout, and during rollout. In parallel, the program will also introduce monitoring mechanisms to prevent potential error, fraud, and corruption in delivery through monitoring and validation of

payment lists and payment reconciliation. The goals will be to (a) inform the operational plan for program rollout, (b) improve efficiency and effectiveness of the program, and (c) evaluate the impact of the behavioral designs created to inform iteration and incorporation of the designs in the program. Knowledge management and learning would also be supported, as well capacity-building arrangements.

1.3. Labor Management Procedures

Under World Bank's ESS2 on 'Labor and Working Conditions' the Borrower is required to develop and implement written Labor Management Procedures (LMPs). The purpose of the LMPs are to facilitate planning and implementation of the project. The LMP identifies the main labor requirements and risks associated with the project and helps the Borrower to determine the resources necessary to address project labor issues. The LMP identifies the main labor requirements and risks associated with the project, and is designed to enable project-related parties, such as the staff of the Project Implementation Unit (PIU), contractors, subcontractors, primary suppliers, and project workers to have a clear understanding of what is required on a specific labor issue. The project will ensure compliance with provisions of relevant national laws as well as World Bank guidelines regarding the COVID-19 situation, in particular "ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects", April 7, 2020.

Management of a project's labor resources is essential for the project's development and implementation. This LMP will set out the way in which project workers are managed in accordance with the provisions of the relevant national laws, including the Sudan Labor Law 1997. And in accordance with the requirements of the World Bank's Environmental and Social Framework (ESF), specifically Environmental and Social Standards (ESS): Labor and Working Conditions (ESS2) and Community Health and Safety (ESS4).

The LMP is a living document, initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project. In preparing and updating the LMP, the Borrower refers to the requirements of the national law and ESS2, as well as the World Bank Guidance Note to ESS2.

1.4. Rationale of the Labor Management Procedures

To deliver the project, the use of government, private, and community human resources is anticipated at all levels from National to State to localities and to the communities. The Government of Sudan recognizes that a comprehensive management of human resources is important to augmenting the positive outcomes of the project. The LMP has therefore been developed to:

- Promote safety and health at work;
- Promote the fair treatment, non-discrimination and equal opportunity of project workers;
- Protect project workers, including vulnerable workers such as women, persons with disabilities, youth (of working age, in accordance with Sudan legal provisions and the WB's ESF-ESS2) and, contracted workers, community workers and primary supply workers, as appropriate;
- Prevent the use of all forms of forced labor and child labor; and
- Provide project workers with accessible means to raise workplace concerns.

2. Overview of Labor Use on the Project

2.1. Numbers and characteristics

At this stage, the Project has identified initial numbers and characteristics of workers to be engaged for the implementation of the project activities, which are subject to change during the course of the Project. However, any changes of numbers and characteristics of workers will be updated and embedded in this document accordingly. The different categories of workers expected to be engaged in the Project include:

- Direct workers, who are employed or engaged directly by the Borrower (including the project proponent and the project implementing entities) to work specifically in relation to the Project. These parties will mainly include seconded staff from their relevant ministries and departments, and specialists of the PIU, as well as national and international individual consultants;
- Contracted workers, who will mainly provide core functions of the project, and will compose of specialized service providers for a limited period of time. These parties will mainly include CSOs/ NGOs, which are expected to play an important role in reaching out to remote areas, on behalf of the government;
- Primary supply workers, who will be employed by project suppliers, and will be in charge of supplying commodities to the project offices, including non-consulting services, in an ongoing basis; and
- Community workers, who will perform voluntary work to the broader beneficiary communities.

The project workforce will include both male and female workers. The following sub-sections provide a description to the type of workforce, along with number estimates, up to the time of preparing this document:

Direct workers

Direct workers are those who are employed or engaged directly by the Borrower (including the project proponent and the project implementing entities) to work specifically in relation to the Project. In the SFSP context, direct workers will be assigned to carry out direct work for the project, in various disciplines and stages. This will include seconded staff from the federal and state Ministry of Finance and Economic Planning (MoFEP), the Ministry of Labor and Social Development (MoLSD), the Ministry of Interior (MoI), and Project Implementation Unit (PIU), as well as sector experts from other departments as may be relevant to the project. All government civil servants, seconded to work on the project, will remain subject to the terms and conditions of their existing public sector employment agreements/arrangements, as understood under ESS2, Scope of Application, paragraph 8. Direct workers will also include assigned staff from central and local Banks, Sudapost, and other payment agencies to be determined, as well as national consultants.

The Project will engage foreign workers in certain areas, where international expertise is required. However, those international experts are temporary and will only be bound to their consultancy agreements. All individuals working as local or international consultants will perform as one part of the project direct workers

In this stage of the project (LMPs preparation time), the PIU will be staffed with key personnel. Part of the PIU staff will be seconded from their parent departments, and will include: National and State

Project Coordination Officers, Accounting Officers, Communication Specialists, Operation Officers, Payment Officers, M&E Officers, E&S Risk Management Officers, GRM Officers, and Financial Management and Procurement Officers.

However, the project will also outsource/ contract the following staff: The Program Manager, Business Analyst, MIS Manager, Database Administrator, Network Administrator, System Administrator (IT/software), Network Administration, and Project Auditors.

The following table provides more insight into categories and expected numbers in connection with direct workers:

Table 1: Types and number estimates of the Project workforce

Type of workers	Number estimates
Seconded staff from Federal MoFEP, MoLSD, MoI, and others TBD	20
Other sector departments (upon need)	20
National and local banks' representatives	50
Sudapost field staff	180
PIU staff (central and local)	70
National and international consultants	20
Total	*360*

All of these workers are civil servants, whose salaries are financed through government funds and for whom the provisions of the "National Civil Services Act 2007" and regulations thereof apply. As such, only ESS2's provisions on Occupational Health and Safety and protection of the work force (in relation to child labor and forced labor) apply to government civil servants, who are seconded to the project.

Direct workers will be engaged in day-to-day project management and oversight. Activities will include reporting to higher management as well as to the World Bank on progress and arising issues. Direct workers will also be responsible for undertaking all types of procurement, including, inter alia, purchasing services, supplies and goods, contracting with third parties, designing and implementing communication and outreach campaigns. Additionally, direct workers will be responsible for setting appropriate environments for delivering cash and maintaining databases, especially the improvement of the National Civil Registry (NCR) and protection of data. Monitoring and evaluation of implementation and fulfillment of SFSP objectives will constitute a key role of direct workers. Direct workers will also be in charge of monitoring environmental and social risks of the project, and the reiteration of management plans for mitigating adverse impacts, all in compliance with the WB's ESF and relevant national requirements.

Contracted workers

Contracted workers are those, who will mainly provide core functions of the project, and will compose of specialized service providers for a limited period of time. They will be recruited by the project for undertaking the implementation of various activities. Those would include Payment Service Providers (including local bankers and mobile network operators), as well as CSOs/NGOs, who will be recruited in early stages of the project for implementing delivery of cash transfer in the remote areas, particularly in the conflict/affected areas, on behalf of the Government of Sudan. However, their level of work will be determined based on each state's need. All potential contractors will need to meet eligibility criteria

set by the project management, including in a manner that conforms to the requirements set out in Annex 3 "Management of Contractors" in ESS1. and would enter into the national bidding system This category of workers will also include international firms/contractors/NGOs, who will be responsible for carrying out communication campaigns, information management, as well as delivery of cash (financial agents), namely the World Food Program (WFP), who will reach out and deliver cash in areas, where local governments don't have access to. Additionally, this category of workers will include staff, who are rendering training, study tours, and third-party monitoring services through their employers. Workers of those contractors are expected to perform during their respective active agreements. However, details on duties, timeframe, and experiences will be specified in their home company agreements. Agreements would also be extended according to needs.

Numbers of CSOs/NGOs are estimated at 5, with total engaged staff of around 75, at the country level.

Primary supply workers

Primary supply workers are those, who will be employed by project suppliers, and will be in charge of supplying commodities to the project offices, including non-consulting services, in an ongoing basis. The Project will contract with suppliers for providing goods and non-consulting services, through the national bidding system. This will include: supply of office furniture, vehicles, mobile phones, supply of computing and ICT equipment; supply of IT solutions, computers, printers, network infrastructure and VPN; procurement of e-payment services; as well as non-consulting services, such as: training for staff at head offices, state offices, and localities; youth vocational skills and entrepreneurship training. Efforts of project suppliers will intensify during the early stages of implementation, while setting up central and local representative offices, and cash delivery centers. Details of duties, timeframe, and experiences will be specified in their home company agreements. Agreements would also be extended according to needs.

Total numbers of suppliers are estimated at 10, with total numbers of workers of around 30.

Community workers

ESS2 defines community labor as "labor that is provided by the community as a contribution to the project." For the project, this will include people, who will voluntarily work at the State, district (Mahalia), and locality levels. Specifically, the Project will have frontline workers, community mobilizers, and house-to-house volunteers early onboard. These community workers will be basically responsible for outreach and communication activities before, during, and after cash transfer implementation. Frontline workers will be in direct contact with beneficiaries at cash service points, will answer beneficiaries queries, and receive complaints at the local level, and will participate in monitoring and evaluation processes, among other duties to be defined. Community mobilizers are typically community leaders who will advocate for the Project, provide information to beneficiaries, augment existing local-level capacities, support implementation of social accountability mechanisms, and receive feedback within group meetings (once the pandemic situation permits), among other activities. House-to-house volunteers will reach out at the household level, will introduce the Project to HH beneficiaries, will survey members and socioeconomic status, and will disseminate outreach materials, among others. The Project will set up appropriate agreements with community representatives that ascertains that work is being done on voluntary bases, and further specifies conditions and terms, with which the overall objective is to provide a non-paid contribution to the community. ESS2 applies to project workers including fulltime, part-time, temporary, CDAs and NGOs

staff. Initial estimates of overall volunteering agencies and individuals amount to 1,800 (100 volunteers per each state), which is subject to revision during the course of the project.

2.2. Timing of labor requirements

The following table provides information on timing and sequencing of labor, along with types, numbers, skills, and locations of implementation, throughout the life cycle of the project.

Table 2: Initial labor schedule throughout project life cycle

Sequence	Project stage/ timing	Types of jobs/ activities	Labor & numbers	Skills	Locations
1	Planning & preparation (1st 3 months)	Assembling steering and technical/coordination committees,	Representatives and seconded staff from relevant ministries and departments + advisory consultants Estimated numbers: 40	Administrative	Federal MoFEP in Khartoum
2	Inception + consultation + office supply (1st 6 months)	Building the project implementation & management teams, within PIU + designing and conducting virtual meetings with stakeholders + supply offices and centers with IT equipment, communication, vehicles, etc.	- Direct workers, including the PM and other key specialists as described above - Communication and outreach contractors - Office IT and equipment supplies (workers of suppliers) - Community workers for initiating communication and consultation Estimated numbers: 350	Administrative and technical (PM, procurement, IT, E&S mgt, M&E, and others as described above)	Federal MoFEP in Khartoum and pilot states
3	Targeting, registration, and verification (pilot), within 1st year	Managing national database and inclusion of other beneficiaries + GRM + communication and outreach + training + monitoring	- Direct workers, including NCR assigned staff + coordination staff at target states + national and international consultants - Outreach contractors (local & international NGOs) + training contractors + third party monitoring agents - Workers of suppliers for rendering IT services + network	National registry expertise + IT/ technical/ administrative expertise + training/ communication/ outreach expertise + social expertise + M&E	Designated centers In pilot states including Khartoum

Sequence	Project stage/ timing	Types of jobs/ activities	Labor & numbers	Skills	Locations
			infrastructure + field equipment and vehicles - Community workers for communication and outreach + feedback collection Estimated numbers: 500		
4	Cash distribution (pilot), within 1st year	All cash delivery mechanisms, including cash, digital, and cash cards	Local bankers & Sudapost representatives + M&E staff + coordination + local & international contractors + community workers (volunteers) Estimated numbers: 600	Financial management expertise + international expertise	Cash delivery centers in pilot states, including Khartoum
5	Targeting, registration, and verification (rollout), within 2nd year	Managing national database and inclusion of other beneficiaries + GRM + communication and outreach + training + monitoring	- Direct workers, including NCR assigned staff + coordination staff at target states + national and international consultants - Outreach contractors (local & international NGOs) + training contractors + third party monitoring agents - Workers of suppliers for rendering IT services + network infrastructure + field equipment and vehicles - Community workers for communication and outreach + feedback collection	National registry expertise + IT/ technical/ administrative expertise + training/ communication/ outreach expertise + social expertise + M&E	Designated centers in the remaining states of the country

Sequence	Project stage/ timing	Types of jobs/ activities	Labor & numbers	Skills	Locations
			Estimated numbers: 1,000		
6	Cash distribution (rollout), within 2nd year	All cash delivery mechanisms, including cash, digital, and cash cards	Local bankers & Sudapost representatives + M&E staff + coordination + local & international contractors + community workers (volunteers) Estimated numbers: 1,600	Financial management expertise + international expertise in rural areas	Cash delivery centers in remaining states
7	SSN development, starting 3rd year	Office and field work (surveys), targeting, registration, promotion, implementation, following up, and M&E	MoLSD local officers + E&S/ M&E specialists + local and international NGOs as contractors Estimated numbers: 500	Social + administration + technical expertise	Designated MoLSD centers in all states

For all of the above types of labor, all provisions of ESS2 apply, including the requirement of clear terms and conditions of employment, non-discrimination and equal opportunity, worker organization in accordance with the law, prohibition of child and forced labor, as well as occupational health and safety and access to a worker GRM system.

3. Assessment of Key Potential Labor Risks

The potential labor risks are those related to labor and working conditions, such as work-related discrimination, inadequate payment of wages to project staff and related issues involving terms and conditions of employment, Gender Based Violence/ Sexual Exploitation and Abuse/ Sexual Harassment (GBV/SEA/SH), security risks, and OHS risks, including workplace accidents/injuries and inadequate awareness of OHS requirements. It is not expected that the project will involve a labor influx, because the distribution of cash payments for beneficiaries will be mainly through digital system, and above all the project will not involve construction of buildings or other physical infrastructure. The following are key labor risks expected during the implementation of the project:

1. Child labor/ forced labor: The project will recruit skilled to semi-skilled field staff with post-secondary school academic qualification for the data collection works, and all project workers will be required to provide enough IDs and/or provide a written confirmation that they are at least 18 years of age, at the time of recruitment. However, as the project is intended to engage community workers on a voluntarily basis, field work may witness some child labor who could be below the project minimum working age of 18. Risk is considered high, as interested communities may misperceive their participation in the project as an opportunity for winning a job, which will increase families' interest in engaging their children. This is only possible if hosting CSOs/NGOs are not having enough measures in place to ensure age compliance upon deploying the community campaigns. On another hand, it is expected that some forced labor performed by host CSOs/NGOs might occur. This is only possible if CSOs/NGOs do not possess a clear mandate or insufficiently/ unclearly describe roles and responsibilities to the volunteers before commencing work, including, among others, information on working/resting hours, rights to have a safe working environment, and rights to complain. Direct impacts would include GBV/ SEA/ SH, and physical/ psychological issues, as well as transmission of communicable diseases (COVID-19 in particular). Indirect impacts would include missing important educational and developmental opportunities for the impacted children.

The risk of child labor/ forced labor will be minimized through certification of workers' age using legally recognized documents such as Identification Card. Further, awareness raising sessions will be conducted regularly to communities to sensitize on prohibition and negative impact of child and forced labor. Mitigation measures will include field inspections on participating CSOs/NGOs, whether they have enough provisions in place to prohibit child labor/ forced labor, as well as whether they maintain enough records of community workers during field campaigns.

2. Community health and Safety & Occupational health and safety (OHS) risks: As set out in ESS4 (Community Health and Safety), the Borrower is required to avoid or minimize the potential for community exposure to communicable and non-communicable diseases. It is expected that some gathering events would occur in remote areas during registration and payment delivery, at the designated service points, especially where digital means are not available. This in turn, would create excessive interaction, and would result in intensified COVID-19 transmission cases, as well as other communicable diseases. This Project-related risk is mostly foreseen among sensitive and vulnerable groups (incl. IDPs & refugees), who might be unaware of such risks. It also applies to Project workers, if proper Occupational Health and Safety (OHS) measures are not taken

appropriately (according to ESS2 Labor and Working Conditions). Project workers (including community workers) will form a potential vector to transmitting COVID-19 as long as they are mobile, and in continuous interaction with the larger communities. Likewise, the Borrower will ensure that all project activities are undertaken in accordance with national law, WHO and World Bank guidance in relation to COVID-19, so as to combat the transmission of COVID-19 between project workers and affected local communities.

Other risks related to OHS and project beneficiaries include exposure to excessive heat and direct sun, which would result in heat-related injuries such as heat stroke and heat exhaustion. This risk can be seen high, aggravated by insufficient health insurance provisions by employers, and would result in direct health impacts on individuals, and public health in the end.

The project will ensure enough minimization provisions, such as minimizing physical gathering by using alternative digital means for registration and payments. However, where digital means are not an option, especially in remote areas, physical gathering will be inevitable, thus adverse impacts, such as transmitting communicable diseases, the COVID-19 in particular, would require the application of mitigation measures, which are related to social distancing and site management at the service points. Such measures would specifically include, but are not limited to:

- Conducting pre-employment health checks, and providing enough health care coverage;
- Controlling entry and exit from duty offices and service/ delivery centers;
- Reviewing work arrangements, to see if they are adequate and designed to reduce contact with the community
- Reviewing contract durations, to reduce the frequency of workers entering/exiting duty offices and service/ delivery centers;
- Rearranging work tasks or reducing numbers on offices and service/ delivery centers to allow social/physical distancing, or rotating workers through a 24-hour schedule;
- Providing appropriate forms of personal protective equipment (PPE), including applying site hygiene, hand sanitizers and face masks;
- Putting in place alternatives to direct contact, like tele-medicine appointments and live stream of instructions; and
- Increasing digital literacy of beneficiaries, while being at the service center, through providing prompt technical assistance, on how to tap on digital cash transfer mechanisms.

On another hand, risks on communities and project workers in this area would also include traffic and road safety and associated injuries. These risks link to Project activities, where beneficiaries need to use means of transport to approach cash service points. It also applies to Project workers who use the road frequently to provide cash transfer services. This risk is foreseen low, as the Project has put in place measures that ensure enough proximity to beneficiary places, without the need to travel long distances, in addition to using digital cash transfer means. However, risk would still exist in remote areas, where digital means may not be an option. If occurred, travel-related incidents/ injuries will have safety impacts on both Project workers and beneficiaries. Impacts in this sense are expected to be direct at the individual level.

To minimize impacts of transportation, the project will assign cash points as much closer to beneficiary communities as possible, and will promote digital means to minimize travel to service points. Mitigation measures would also include scheduling registration and cash distribution away from peak hours, and increasing awareness on digital means.

3. Gender-Based Violence/ Sexual Exploitation and Harassment (GBV/SEA/SH): Given the context of the project, is a risk. Power is unequally distributed in all the communities in which we work, creating situations where certain people are dependent upon others. Unfortunately, some choose to abuse this power over others, which is the root cause of many forms of violence including exploitation. Exploitation occurs when people in power (e.g., cash-for-work supervisors, community leaders, vendors and even program staff) use their position to demand favors or certain behaviors, sexual or otherwise, from less powerful groups or individuals. Other drivers for exploitation include financial illiteracy, especially by women, who need to deal with e-transfers. Given the context of the project, risk of sexual harassment, exploitation and abuse of co-workers and survey respondents substantial and direct and at the individual and household levels.

For mitigating adverse impacts of GBV/SEA/SH, the PIU will:

- Ensure that all staff, including direct workers, contracted workers and community workers sign a code of conduct (see Annex I) outlining expected standards of behavior and the consequences of breaches of that behavior in relation to GBV/SEA/SH, and will attend regular bi-monthly sessions on understanding and addressing GBV/SEH in the workplace;
- Raise awareness regarding GBV/SEA/SH and ensure that all project workers, including direct workers, contracted workers and community workers, as well as residents of local communities affected by the project, take part in awareness sessions on topics of GBV/SEA/SH, responsibilities related to adherence to the Code of Conduct, and consequence for noncompliance, prior to commencement of any project-related work activities. Such training and awareness sessions will be provided by consulting services contracts. Specifically, the project will hire social protection specialists in early/ preparatory stages of the project, who will design and finalize the training program (periodically throughout the project lifetime), and who will be expected to deliver such training to workers on-the-job. The consulting tender will be open to national firms as well, who would be specialized in gender and abuse matters, including national humanitarian and social protection CSOs/NGOs. and
- Ensure that all project workers, both direct hires[1] and those hired through contractors/subcontractors, have access to the grievance mechanism established specifically for the project workforce or the grievance redress mechanism established generally for the project, to address concerns relating to GBV/SEA/SH.

4. Labor disputes over terms and conditions of employment: Labor disputes are common in Sudan. Likely causes for labor disputes include demand for limited employment opportunities; labor wages rates and employer delays in payment of wages; disagreements over working conditions; and health and safety concerns in the work environment; as well as insufficient health insurance provisions against OHS-related issues. In turn, there is also a risk that employers may retaliate against workers for demanding legitimate working conditions in relation to terms of employment or for raising concerns regarding unsafe or unhealthy work situations, or for any grievances raised; such situations could lead to labor unrest. The project, through its procurement officers, and later on by auditors of the project/ labor inspectors of the MOLSD, will ensure that winning contractors have put in place sufficient measures for receiving and addressing work-related grievances. These obligatory measures would include information on available grievance channels (line/SMS numbers, email addresses, portals, complaining boxes, etc.), complaining formats, languages available, processing time, privacy and data protection, and many others. A dedicated worker GRM will be built for this project to clarify and complement contractors' provisions. See Section 10

[1] All government civil servants on secondment from their home agencies to the project will have access to the grievance measures established for public servants under the national law of Sudan.

(Grievance Redress Mechanism). As part of evaluating contractors, such grievance redress mechanisms will be given appropriate weight in selection criteria, against which offers are evaluated. The Project will have the contractual right to investigate the existence of such systems before commencing work, and that the project management will be given enough authority to inspect these systems throughout the contract lifetime. On another hand, the project management will keep copies of the workers' contracts. It is mandatory that all worker contracts be made in writing, using a language that the worker understands, and terms and conditions clearly stated and agreed upon by both employer and worker, before signing the agreement

5. Security risks: In conflict areas such as Darfur, Blue Nile and South Kordofan States, where attacks frequently targeting government and other strategic infrastructure and persons in urban areas, the security risk on the project workers is substantial. In particular, the Project would have relatively higher risks of armed assault at the designated points of cash delivery in remote areas, where much social unrest, and political conflicts predominate. This risk could result in violence, extortion, taxation, and theft. To reduce security-related risks, the project management will have in place a security management plan, with proportionate arrangements for each service point, in early stages of the project and before starting implementation. However, the project management, in accordance to ESS4 para. 24-27, will ensure the following in providing security measures, as a minimum:

- Assessing risks posed by security arrangements to those within and outside the project sites;
- Guiding security arrangements by proportionality, applicable laws, and Good International Industry Practices (GIIP), in relation to hiring, rules of conduct, training, equipping, and monitoring of security workers;
- Using force only for preventive and defensive purposes proportionate to nature and extent of threat;
- Ensuring that government security personnel act in a manner consistent with guiding principles, as set above as well as proportionate to nature and extent of threat;
- Disclosing security arrangements of the project sites (service points in particular) to the public beneficiaries, subject to overriding security concerns;
- Ensuring security workers are adequately trained, are acting according to applicable laws, and are not implicated in past abuses; and
- Reviewing all allegations of unlawful or abusive acts of security personnel, taking actions to prevent occurrence, and reporting to relevant authorities if necessary.

6. Discrimination and exclusion of women and other members of vulnerable groups: In remote areas of the country, unemployment and underemployment are widespread. For activities taking place in target communities, such as office cleaning, logistics, security, people with disabilities might be excluded from work opportunities, being considered unfit. This is also applicable to women, who could be excluded from work opportunities that need physical capacity, or in connection to community unacceptance, for cultural/ traditional reasons. Of particular concern, are people with indigeneity characteristics, who could be discriminated based on their culture, language, religion, race, origin, political stands, views, IDs, and others, and thus being excluded from working in the project. Such risks are considered substantial, direct on individuals, and indirect on communities. The project will ensure that decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements.

However, in order to reduce any expected adverse impacts in this regard, the project will:

- Target people with disabilities with appropriate types of work, for instance opening office work opportunities to people with movement disabilities, or targeting hearing-impaired persons for office cleaning work opportunities;
- Assign females to carry out advisory work for women beneficiaries, where community cultures require male/female separation;
- Provide enough terms and conditions in agreements with vulnerable groups stating their rights for wages, safe working conditions, health care, resting, maternity and family leaves, as well as their right to complain through a well-defined, appropriate complaining mechanisms, among many others;
- Monitor adherence of contractors/ sub-contractors to terms and conditions, maintaining records, and field inspection, as well as trigger penalties in case of noncompliance;
- Ensure participation of members of ethnic groups in working opportunities within their geographical areas, by reaching out with available opportunities using appropriate culture, format, language, and communication approaches;
- Ensure adequate legal framework in place for providing equal job opportunities, and privacy and personal data protection, among others; and
- Ensure enough protection measures while on job, and put in place and train on appropriate channels for grievance (see section 10).

4. Overview of Labor Legislation: Terms and Conditions

4.1. International conventions

Sudan has ratified a total of 14 International Labor Organization (ILO) Conventions; these include several instruments of particular relevance to the employment policy. These are:

- Fundamental Conventions. These are: C029 Forced Labor 1930, C098 Right to Organize and Collective Bargaining 1949, C100 Equal Remuneration 1951, C105 Abolition of Forced Labor 1957, C111 Discrimination (Employment and Occupation) 1958, C138 Minimum Age 1973, and C182 Worst Forms of Child Labor 1999;
- Governance Conventions: These are: C081 Labor Inspection Convention 1947 and C122 Employment Policy Convention 1964; and
- Technical Conventions: These are: C002 Unemployment 1919, C019 Equality of Treatment (Accident Compensation) 1925, C026 Minimum Wage-Fixing Machinery 1928, C095 Protection of Wages 1949, C117 Social Policy (Basic Aims and Standards) 1962, C175 Part-Time Work 1994 and MLC Maritime Labor 2006.

4.2. National labor legislations

The following is a list of Government of Sudan's Labor Laws, followed by specific terms and conditions applicable to Project workers:

- Labor Act 1997
- The Labor Accident Law 1981
- The Social Insurance Law 1995 and its amendment
- The Minimum Wage Law 1974
- Second Public Servant Regulation 2007
- Compensation cause of injuries: Employee compensation is covered by Compensation Act 1981 and Social Insurance and Pensions Act 2016
- The National Pension Law 1991
- Sudan's Constitution of 2019 Mandate of the Transitional Period

The principal piece of legislation regulating labor matters in Sudan is the Sudanese Labor Act 1997. The Sudanese Labor Act repealed certain legislations, namely, the Labor Forces Act 1974, the Industrial Relations Act 1976, the Industrial Safety Act 1976 and the Industrial Labor Relations Act 1981. In addition to the Sudanese Labor Act, the Organization of Employment of Non-Sudanese Act 2001 provides for the rules regarding employment of foreigners in Sudan, the Minimum Wages Act 1974 provides for the rules regarding minimum wages and the Social Insurance Act 1990 provides for the rules regarding social security.

Terms and conditions

The Labor Code of 1997, includes the following provisions in relation to terms and conditions:

- Article 28 (1) requires the employer to provide the worker with a written employment contract, if exceeding three months in duration. Such contract will be written in three copies and duly signed by the two parties. Each party will keep one copy and the third copy will be deposited with the Labor Office.
- According to Article 30, the employer should explain the content of the work agreement in an understandable way to the worker, which should include among others "the agreed wage and the time of payment".

Wages

Under definitions section, Article 4 of the 1997 Labor Act defines wages as: the aggregate of the basic pay and all other remunerations payable to the worker by an employer and includes the value of any food, fuel or residence and any overtime, payments or other special remunerations for any work done and any other increments, provided. The wage shall not include traveling allowance or privilege or any subscription paid by the employer for the worker in any social insurance project, such as provident fund or pension or life insurance, or special expenses paid by the employer to the workers.

Article 30 requires that the contract should include among others "the agreed wage and the time of payment". It is important to mention here that the minimum wage is determined by a national tripartite committee. Under Article 13, the worker’s wage is determined by the initial value of his/her position. In April 2020 the MoFEP raised the minimum wage from SDG 425 to SDG 3,000, the largest increase in the history of the Civil Service in the country. The salaries of civil servants increased by an average of 569%. Article 35(8) states that Wages shall be paid personally to workers or to their proxy. No cuts shall be authorized except cuts made under the provisions of this Act or any other Act. In case of any

cuts, the employer shall, upon the worker's request, provide him/her with a statement showing details of such cuts. However, according to Article 36, a worker shall not be entitled to any wage for the period of his absence from work except in cases authorized by this Act or cases in which the employer authorizes the absence from work.

Rest

Workers are entitled to a weekly rest period consisting of not less than twenty-four non-interrupted hours in the course of each period of seven days. The weekly rest period shall be calculated as to include the period from 6 a.m. to the next 6 a.m. Where the nature of the work or the service performed by the employee is such that the weekly rest cannot fall on a Sunday, another day maybe made a weekly rest day as a substitute. According to Article 42 Official hours of work are 48 hours per week or 8 hours per day broken by a paid period of rest of not less than half an hour per day for eating or resting. However, periods of rest can be amended for certain categories of workers, as required by the nature of work. During the holy month of Ramadan, working hours are reduced by one hour.

Annual Leave

Article 44 (2) organizes the annual leave after completing one year and more of continuous service with full pay as follows:

a) If the worker completed from one year up to three years of continuous service, he/she shall be entitled to an annual leave equal to twenty days;

b) If the worker completed eight years and less than fifteen years of continuous service, he/she shall be entitled to an annual leave of twenty-five days; and

c) If the worker completed fifteen years or more of continuous service, he/she shall be entitled to an annual leave equal to thirty days.

Article 86, Public Civil Service Regulations 2007, regulates the annual leave by scale and categories as shown in the Table (1) below" [2]

Table 3: Annual Leave by Scale and Categories

SN	Scale	Days
1.	Scale 8 and above	45 days
2.	Scale 10 and less	40 days
3.	Scale 9	35 days
4.	Scale 11 and 12	30 days
5.	Scale 13 to 15	25 days
6.	Scale 16 and 17	20 days

[2] Public Civil Service Regulations 2007 (Arabic)

Maternity Leave

Article 46 (1) A woman worker after the completion of six months of service from the date of her appointment and for any subsequent year of service, shall be entitled to a delivery leave on full pay calculated as follows:

a) Four weeks before the delivery and four weeks after delivery, provided that the probable date of delivery and the actual date on which delivery takes place, shall be certified by the Medical Practitioner;

b) A permission may be given optionally for the same period of leave as provided in Paragraph (a) to be two weeks before delivery and six weeks after delivery; and

c) If the woman worker absents herself after the completion of the period mentioned in Paragraphs (a) and (b) above, due to illness resulting from pregnancy or delivery, which makes her unable to resume work with a certification of the Medical Practitioner, she shall be on a sick leave.

Article 46 (2). Without prejudice to the provisions of Paragraphs (a) and (b) of Section 50 of this Act, the woman worker shall not be dismissed during the period of pregnancy, or during the delivery leave.

The Constitutional document of the transitional government 2019 (49) on Women's Rights provides:

- The state protects women's rights as provided in international and regional agreements ratified by Sudan.
- The state guarantees to both men and women the equal right to enjoy all civil, political, social, cultural, and economic rights, including the right to equal pay for equal work, and other professional benefits.
- The state guarantees women's rights in all fields and develops them through positive discrimination.
- The state works to combat harmful customs and traditions that reduce the dignity and status of women.
- The state provides free healthcare for motherhood, childhood and pregnant women.

Sick Leave

Article 47 (1) provides subject to the provisions of the Work Injuries Compensation Act 1981, if the worker completed a period of not less than three months of continuous service and is unable to come to the place of his/her work because of a certified illness the reason of which is not due to his misconduct or negligence, he/she shall be entitled to a wage for all the days of his absence, due to such illness and the wage shall be calculated on every subsequent twelve months he/she spends in the continuous service as follows:

a) Three months with full pay

b) Three months with half pay

c) Three months with quarter pay

Article 47 (2) The worker shall not be on sick leave with reduced pay unless he/she has exhausted his/her normal leave.

Article 47 (3). An employee with more than three months' service and who is unable to attend work because of sickness, which is certified by a doctor, is entitled to paid sick leave as follows:

- 100% pay for the first three months of absence
- 50% pay for the next three months of absence
- 25% pay for the following three months of absence

Article 47 (4). If the sickness lasts for more than the period provided for above, the employee would remain on unpaid sick leave until they are examined by a medical committee who will determine whether they are fit to work.

Gaps Analysis

1. The Labor act does not cover volunteerism type of work. Therefore, community workers, who will work on volunteering bases for this project, will be managed according to the provisions of ESS2 and this LMP.
2. In comparison to the requirements of ESS2, the Labor Code requires providing a written employment contract only if exceeding three months in duration, while ESS2 requires the provision of terms and conditions information at the beginning of the working relationship, and when any material changes to the terms or conditions of employment occur. This is foreseen as a gap. Therefore, the project will provide a written terms and conditions to workers as per requirements of ESS2.
3. On another hand, provisions concerning working hours, wages, overtime, compensation, benefits, rest, and annual/maternity/family leaves, provided by the above mentioned Labor Code, Public Service Regulations, and the Constitutional document on Women's rights, are foreseen enough and in compliance with requirements of ESS2 (paras. 10-12). The project will therefor stick to legal provisions in this regard.

5. Overview of Labor Legislation: Occupational Health and Safety

5.1. The National Health Policy

Policy envisages the strengthening of environmental health services, of which occupational health is a component. In order to avert or mitigate OHS-related risks, the policy advocates for the coverage of all workers, including those working in the informal sector, in small and medium-sized enterprises and in agriculture by essential interventions for primary prevention of occupational and work-related diseases and injuries. Accordingly, it urges health authorities at all levels to take measures to establish and strengthen core institutional capacities and human resource capabilities to deal with the special health needs of working populations. This is especially applicable to the COVID-19 outbreak situation that would impose health risks on project workers.

5.2. The Labor Code

The main legislation on occupational safety and health is contained in the Labor Code of 1997, and List of Factories Decree (occupational health) of 1981.

Chapter IV of the Act - Employment of Women and Young Persons, articles 19-20, state that it shall be prohibited to employ women in occupations which are hazardous, arduous or harmful to their health, such as carrying weights or exposing them to poisonous material or to temperatures exceeding the normal limits borne by women. For health considerations, the total daily periods of rest for women shall not be less than one paid hour during formal working hours. The duration of work shall not exceed five continuous hours without any rest. This is especially related to the Project in terms of prolonged exposure to day temperatures and health impacts thereof, as well as in terms of workers' right to rest while working at central offices and service centers at the state and local levels.

Chapter IV similarly tackles young workers. According to articles 21-23, it is prohibited to employ young workers to carry out work which on account of its nature, or due to the condition, in which it is carried out, endangers their life or health. According to the Law, it shall be forbidden to employ a young person in hazardous or unhealthy industries and jobs, or in jobs requiring large physical effort or involving carrying heavy loads, or in jobs or occupations which are harmful to their morals. Working hours shall be broken by a period of rest of one paid hour. Particularly, this is expected in the stage of providing office equipment to the Project, and setting up service delivery centers and carrying out awareness campaigns, which might involve young workers (though of working age).

In addition, the provisions of Chapter XI – Industrial Safety shall also apply to office works as stated in Table 1 and annexed to this Act (Article 75). Under this Chapter/ Articles 76-78, the owner of work place shall register his establishment at the competent authority. The owner shall, within a period not exceeding one year, submit to the competent authority a true statement indicating the number of workers, the conditions of work, the means of protection and any other relevant information requested by the competent authority (Article 85). The owner of the establishment shall, by the provisions of this Act (Article 88), be subject to the Industrial Safety Inspector appointed by the competent authority.

With respect to reporting of occupational accidents, Article 92 requires that every owner of an establishment shall inform the competent authority of any accident which may happen during the daily working hours or because of the work itself, which may result in:

a) The death of a worker;
b) A fire or an explosion;
c) A serious injury;
d) The obstruction of any worker to perform his job.

According to Article 94, every owner of an establishment shall inform his workers of the occupational hazards and means for protection against such hazards. He shall take the necessary precautions to protect workers against industrial accidents and occupational diseases (applicable to COVID-19 situation).

Additionally, under Article 95, employers shall not assign a worker to perform a job before providing him/her with enough training or before making him/her work under the supervision of one or more experienced persons in the field. Concerning Workers' duties, Article 96 states that it shall be prohibited

for a worker to perform an act which may expose him/her or the others to danger. He/she shall be obliged to use every means of protection provided to him/her by the employer.

According to the requirements of ESS2, Occupational Health and Safety section, OHS measures shall include those appropriate to the type of project, and stated in Environmental Health and Safety Guidelines (EHSGs) and the Good International Industry Practices (GIIPs), and shall be accordingly set out in the legal agreement and the Environmental and Social Commitment Plan (ESCP) of the project. OHS shall be designed and implemented to address:

- Identification of potential hazards to project workers;
- Provision of protective and preventative measures, including modification, substitutions, or elimination of hazards conditions or substances;
- Training of project workers and maintaining of training records;
- Documentation and reporting of occupational accidents, diseases and accidents;
- Emergency prevention and preparedness and response arrangements to emergency situations; and
- Remedies for adverse impacts such as occupational injuries, deaths, disability, and disease.

It is required that the employer shall develop and implement procedures for establishing and maintaining a safe working environment, including workplace and equipment, in a manner that don't pose risk on workers' health. The employer shall actively collaborate and consult with project workers in promoting understanding and implementation of OHS requirements, including training, and provision of Personal Protective Equipment (PPE) without expense to the workers

The employer is also required to set procedures for workers to report unsafe or unhealthy working situations. Such procedures shall allow workers to remove themselves from a work situation that they believe it presents imminent and serious danger to their life or health. Workers who act as such, will not be required to return to work until corrective actions taken, and accordingly workers will not be retaliated against or otherwise be subject to reprisal for negative action for such reporting or removal.

Project workers shall be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities and appropriate areas for rest.

Where project workers are employed or engaged by more than one party and are working together in one place, employers engaging such workers shall collaborate in applying the OHS requirements, without prejudice to the responsibility of each party for the health and safety of its own workers

The employer shall put in place a system for regular review of OHS performance and working environment, which shall include, among others, identification of safety and health hazards and risks. Implementation of effective response to hazards and risks, priorities for action, and evaluation of results.

Gaps analysis

1. In comparison to the OHS requirements of ESS2, the Labor Code doesn't provide enough reference to environmental health and safety and good industrial practices. It also doesn't set OHS priorities within a working environment, although it urges engagement of women and young workers in non-hazardous working environment and giving them the right for enough resting;

2. The Labor Code highlights the employer being subject to inspection by competent authorities, nevertheless, it doesn't provide information on establishing, maintaining, equipping, and training on OHS system and procedures for the work environment, including workplace, workers, and equipment; and
3. It is not clear in the Labor Code how workers may report hazardous situations, or officially having the right to removing themselves form dangerous or life-threatening situations without being retaliated or reprised by their employer.

The Labor Code in its current provisions doesn't provide enough instructions for protecting workers against transmission of COVID-19. The project is taking these OHS related gaps into consideration, and accordingly, the project will apply the more stringent provisions set out by ESS2 and this LMP. In addition to ESS2 requirements, the project will adopt the following interim notes and guidance against COVID-19 transmission:

- ESF/Safeguards Interim Note: COVID-19 considerations in construction/civil works projects
- For rational use of PPE: WHO interim guidance on use of PPE for COVID-19[3]
- For workplace-related advice: WHO guidance getting your workplace ready for COVID-19[4]

5.3. Other Regulations

The work injury insurance is regulated by the Social Insurance Law that started in 1974, and still effective to-date. It insures public and private sector employees and self-employed persons. However, it excludes household workers, family labor, home-based workers, farmers, foresters, and unpaid apprentices and prisoners working in prison workshops. The insured person contributes nothing, while the employer contributes with 2% of gross monthly payroll. The system pays for temporary disability benefits, permanent disability benefits, workers' medical benefits, and survivor benefits.

However, workers' compensation is regulated by The Work Injuries Compensation Act of 1981, which includes the following key sections:

- Section one covers the Preliminary provisions
- Section two covers workplace injuries.
- Section three covers the workplace injury compensation.
- Section four covers the various provisions

6. Responsible Staff

The Digital Transformation Agency, a Cross-Ministerial body reporting to the MoFEP, and the Ministry of Finance and Economic Planning, will be the implementing agency for the project. The Digital Transformation Agency will include MoFEP, MoLSD, Ministry of Interior, Justice, Health, Education and the Central Bank of Sudan.

Until such an agency exists, the MoFEP will be the institutional home for the SFSP including the beneficiary database. The Undersecretary of Finance will be responsible for the management of the

[3] https://apps.who.int/iris/bitstream/handle/10665/331215/WHO-2019-nCov-IPCPPE_use-2020.1-eng.pdf

[4] https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf

project, reporting to the Minister of Finance and supported by a PIU that will be responsible for the day-to-day implementation of the SFSP. The PIU will be headed by a program manager and would include, inter alia, specialists in communications, operations, database administration, payments, IT, field operations, M&E, environmental and social (E&S) risk management, financial management and procurement.

To ensure social accountability in the implementation of the project, the MoFEP and the MoLSD will support the development of social accountability and citizen engagement mechanisms with the support of CDAs (or CSOs) and NGOs. These CDAs will support the project by generating social mobilization, outreach activities, and maintaining of continuous contact with beneficiary households. These community associations will also provide feedback loop on service delivery of the SFSP.

The responsible body for management of project workers varies depending on the type of workers. As for direct workers: these include National and State staff at the MoFEP, PIUs, and supporting staff in all 18 states, as well as consultants who work for the project; and the Ministry of Labor and Social Development involved staff. The project may also engage sector experts from other departments as may be relevant to the project. All of these workers are civil servants, whose salaries are financed through government funds and for whom the Sudan regulations for Public Civil Service applies." The direct workers will be managed by the MoFEP PIU at the national and the state levels, including seconded staff from other departments and contractors.

MoFEP (PIU) will be responsible for the following:

- Develop, maintain, implement, update, and control this LMP document;
- Ensure all Contractors comply with these labor management procedures;
- Ensure the contracts with the contractors are developed in line with the provisions of this LMP, and that contractors include enough obligations toward providing GBV/SEA/SH and OHS-related training to their subcontractors;
- Monitor to verify that contractors are meeting labor and OHS obligations toward contracted and subcontracted workers, and whether enough GBV/SEA/SH and OHS trainings are provided to their subcontracted workers;
- Provide project-specific training on GBV/SEA/SH and OHS requirements to project workers periodically throughout the project life cycle, including on-the-job trainings. The PIU of the project will provide such training by its E&S specialists, however, the PIU will consider procuring specialized GBV/SEA/SH and OHS trainings from eligible consultancy firms, where necessary;
- Monitor contractors and subcontractors' implementation of LMP;
- Ensure that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it;
- Have a system for regular monitoring and reporting on labor and occupational safety and health performance; and
- Monitor implementation of the Worker Code of Conduct.

As stated in the Project Operational Manual (Section 4.2 Procurement), the international competitive procurement will use the World Bank's Standard Procurement Documents (according to the New Procurement Framework and Regulations for Projects After July 1, 2016[5]).

[5] https://projects.worldbank.org/en/projects-operations/products-and-services/brief/procurement-new-framework

When approaching the national market, as shall be agreed in the Procurement Plan, the country's own procurement procedures may be applied, provided that such procedure shall be subject to the requirements as provided in section 5 paragraph 5.3 to 5.6 of the Procurement Regulations for IPF Borrowers.

As such, the project will use contracting templates provided by the Procurement Framework and Regulations. The Contracting Agreement will include conditions and clauses on Forced Labor/ Child Labor, Trafficking-in-person and GBV/SEA as well as on obligations to Health and Safety, to which the contractors will need to commit and adhere.

The LMP and OHS responsibilities of the Contractors will include the following:

- Follow the labor management procedures and occupational health and safety requirements as stated in the contracts signed with MoFEP;
- Contractors will keep records detailing the specifications of the job description of each worker;
- Supervise the subcontractors' implementation of LMP and occupational health and safety requirements;
- Maintain records of employment, and training of contracted workers as provided in their contracts;
- Communicate clearly job descriptions and employment conditions to all workers;
- Make sure every project worker hired by contractor/subcontractor is aware of the MoFEP (PIU) dedicated call center, phone number, email address, and web portal through which any worker can submit his/her grievances; and
- Provide induction and monthly training to employees on labor law protections in relation to occupational health and safety, including training on their rights to safe and healthy working conditions under Sudan labor law, on the risks of job-related injuries and accidents, , and on measures to reduce risks to acceptable levels, as well as periodical trainings on GBV/SEA/SH.

Note: The child labor and forced labor (if any) as well as GBV/SEA/SH and OHS requirements apply to all categories of workers in the project activities.

7. Policies and Procedures

Employment of project workers will be based on provisions of Labor Code of the Year 1997 and amendments, in addition to all pertinent regulations and international conventions, as reviewed above.

Employment will be based on the principles of nondiscrimination and equal opportunity (C111 Discrimination (Employment and Occupation) 1958). 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. Recruitment procedures will be transparent, public and non-discriminatory, and open with respect to ethnicity, religion, disability, gender, or gender orientation.

The following measures, which are mainly based on provisions of the Labor Code – Chapter V – Contracts of Employment, will be followed by contractors and monitored by the MoFEP through PIU to ensure fair treatment of all workers:

- Applications for employment will only be considered if submitted via the official application procedures established by the 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. Workers will sign the employment contract and receive a signed copy of their individual employment contract. The PIU and contractors will keep an exact copy of the individual worker's signed employment contract on file for inspection by the World Bank and the Borrower. This measure is consistent with the Labor Code: Chapter V. Contracts of Employment, Article 28. "The writing of employment contract".
- 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 (in this case, the "Employer" would be the contractor);
- Depending on the origin of the employer and employee, employment terms and conditions will be communicated in a language that is understandable to both parties;
- In addition to 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, and at no financial expense to the worker;
- The Project is expected to hire international consultants to deliver capacity building activities to the PIU, in addition to an international monitoring agent, who will be engaged during project implementation. Therefore, foreign workers will require residence permits, which will allow them to work in Sudan; and
- Normal working time should not exceed 40 hours per week. With a five-day working week, the duration of daily work is determined 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.

Project Standards: In case of deviations between Sudan's labor regulations and the World Bank's ESF, the project will follow the more stringent standard. The project shall ensure that appropriate mechanisms for prevention and mitigation are being implemented, such as to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations and the precautions necessary to avoid accident and injury to health. In addition, there will be established steps to respond to and report of any accidents, emergencies or incident which may occur in relation to implementation of activities. Similarly, workers are expected to cooperate and comply to the procedures, measures and steps.

<u>As for COVID-19 transmission, health care, and communication:</u>

The project management team, during the course of the project, will identify measures to address the COVID-19 situation, specific to where project activities are taking place. These measures will be determined according to each site's location, available resources and supplies, capacity of local emergency health services, and to which extent the virus exists in the area. The project will establish a systematic approach to planning and recognizing challenges associated with rapidly changing circumstances. For planning and putting necessary measures against COVID-19 spread and infection, the project management team will refer to:

- ESF/Safeguards Interim Note: COVID-19 considerations in construction/civil works projects;
- For rational use of PPE: WHO interim guidance on use of PPE for COVID-19; and
- For workplace-related advice: WHO guidance getting your workplace ready for COVID-19.

Measures will be compiled and tailored to each location's context. However, the following overarching measures will be adopted[6]:

1. Assessing workforce characteristics: the project will prepare a detailed profile of the project workforce, key work activities, work schedule, and a breakdown of workers who work from home, or who do community works. This also includes assessing those who might be at more risk from COVID-19, as well as those who possess health issues in general. The project will minimize, to the extent possible, movement in and out of workplace, which includes in principle, restricting movement of workers to their area of work. Additionally, community workers will need to perform health checks, before they reach out to target communities.
2. Monitoring entry/exit to the workplace on commencement of work: the project will control entry/ exit of project offices and service centers in the field, by putting in place enough documentation and trained security staff on COVID-19 specific considerations. Other measures in this regard would include confirming that workers are fit for work before they attempt to enter their workplace, which would also include checking and recording body temperatures; providing briefings on COVID-19 specific considerations (for instance: cough etiquette, hand hygiene, and social distancing); and self-monitoring of illness symptoms and reporting back to supervisors; as well as preventing infected workers from returning to their workplace and applying isolation at home for 14 days.
3. General hygiene: the project will provide general awareness, through close collaboration with the national health sector, on detecting important symptoms, washing hands and social distancing, and what to do if they or other people show infection symptoms. This will also include providing enough signage on workplace entrances and in places where gathering is possible to occur; cleaning workplaces and providing enough equipment and disinfection material; as well as safely collecting and disposing general and hazardous polluted wastes (if any).
4. Adjusting work practices: the project will, to the extent possible, decrease working hours, limit numbers of workers on one site, and use rotation methodologies, as well as performing adequate social distancing. These measures would also include using appropriate PPE specific for protecting against COVID-19 for all project workers, with special attention given to field/ community workers. Frequent review to these measures will be performed to ensure soundness and applicability
5. Local medical and other services: the project will collect and maintain enough information about availability of medical care in districts where the project activities are taking place. This would include, but won't be limited to, available health care centers, beds, isolation facilities, treatment equipment, supplies, and referral options, as well as available capacities of the medical care staff.
6. Training and communication: the project management will keep workers engaged in relation to the pandemic situation and how they can protect themselves, through using official channels and appropriate social media. The project will conduct regular training for project workers on

[6] According to sec 5 "What Should the Contractor Cover?" Of the ESF/Safeguard Interim Note: COVID-19 considerations in construction/civil works projects

infection prevention measures, on addressing issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work. The training will also cover all issues that would normally be required on the workplace, including use of safety procedures, use of PPE, occupational health and safety issues, and code of conduct

7. Communication and contact with the community: the project will clearly communicate with the target community about measures put onsite to prevent transmission of COVID-19, and will do so by utilizing available channels such as posters, pamphlets, radio, text messages, and electronic means. Additionally, the project will make the target community aware about measures of protecting against COVID-19, when target community members visit any of the service centers, including prohibiting direct contact with workers. The project will urge project representatives, contractors, and workers to practice social distancing and follow other COVID-19 guidance issued by relevant authorities while interacting with the community.

All measures set above will be periodically revisited and updated according to the changing pandemic circumstances.

8. Age of Employment

In the pursuit of setting, managing, and monitoring age of employment in all phases of the project, the project management will apply the following measures as stipulated in the Labor Act:

According to Chapter I.-Preliminary Provisions of the Labor Act, the minimum age for employment is 16 years. Additionally, according to Chapter IV.- Employment of Women and Young Persons of the Labor Act, it shall be forbidden to employ young persons under the age of 12 years, except in:

- The State's training schools;
- Non-profitable training workshops;
- Jobs supervised by his family members in establishments, which do not employ other persons; and
- Jos performed under apprenticeship contracts.

However, the minimum Age for Hazardous Work is set as 18 years (including works involving carrying heavy loads). Despite the statements above, for the project, the minimum age of employment is 18 years. The PIU will ensure that this minimum age of 18 years for all project workers (i.e. direct workers, workers employed/engaged through contractors/subcontractors, and workers of project's primary suppliers as well as community volunteers) is strictly enforced.

Furthermore, the following measures will be undertaken to ensure child labor/ underage-labor are not existing during all phases of project implementation:

- By virtue of the Labor Act, project workers, including workers of contractors, suppliers and community will be subject to frequent inspections by the competent agency's labor inspector. This would also include inspections on working agreements;
- The Project Implementation Unit, represented by the social specialists, as well as official representatives of the MoFEP/ MoLSD, will also perform frequent checks on workers in the field and during engagement in community campaigns;
- The project will ensure enough copies of Identification Documents that specify the age of a worker presented to, and kept within personnel files of their respective employers at the time

of recruitment/ engagement. This will be also subject to a variety of monitoring procedures/ audits designed for the project throughout its lifecycle;

- Where community workers are to be engaged in the project, the project will diligently engage with community representatives, at early stages, to explain minimum age requirements and the legal reference thereof, as well as clearly stating the legal consequences of having labor below the minimum age of work, on any of the project's activities. The project will also perform field inspections, and spot checks during mobilization of community workers per each area of jurisdiction;
- As for primary suppliers: Where potential child labor is identified or is prevalent or known to exist in a specific sector, industry, or region in connection with the supply of such goods and materials, a mapping exercise will be conducted to identify possible suppliers and the extent to which they may present such risks. The project will conduct frequent reviews/ audits on workers' contracts and copies of their IDs, in addition to field inspects and spot checks. If child labor found, penalties stated in the contract will be applied, and violating suppliers will be excluded from participating in future tenders; and
- If child labor under the minimums age of work (which is 18 as specified by this LMP) is discovered on any of the project's activities, measures will be taken to terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

9. Terms and Conditions

In setting terms and conditions for project workers, the project will refer to the following legislations:

1. Labor Code of 1997;
2. Second Public Servant Regulation of 2007;
3. Occupational Safety Compensation Law 2007: Compensation for work injuries: Employee compensation is covered by Compensation Act of 1981 and Social Insurance and Pensions Act of 2016;
4. ESF/Safeguards Interim Note: COVID-19 considerations in construction/civil works projects;
5. For rational use of PPE: WHO interim guidance on use of PPE for COVID-19;
6. For workplace-related advice: WHO guidance getting your workplace ready for COVID-19; and
7. The ESS2 requirements.

Additionally, the project will follow the following provisions, and will ensure the project contractors and primary suppliers do the same, when setting out work Terms and Conditions with workers:

- The Project will specify the age of employment (as set out in Article 15) as not greater than the age of retirement (65) and not less than 18 (as specified by this LMP).
- Although Article 28 (1) of the Labor Code stipulates that contract is to be made in writing if exceeding three months, the project will, nevertheless, provide workers for durations less than 3 months with a written contract.
- Such contract will be written in three copies and duly signed by the two parties. Each party will keep one copy and the third copy will be deposited with the Labor Office.

- The project will explain the content of the work agreement in an understandable way to the worker, which should include among others "the agreed wage and the time of payment" (Article 30).
- Note: It is important to mention here that the minimum wage is officially determined by the National Tripartite Committee. However, under Article 13, the worker's wage is determined by the initial value of his position.
- Salaries of project workers will be determined in light of all applicable provisions and amendments of Acts mentioned above. In April 2020 the MoFEP raised the minimum wage from SDG 425 to SDG 3,000. The salaries of civil servants increased by an average of 569%. This will be taken into account as well.

As for working hours, the following provisions, according to the Labor Code, will be applied:

- Articles 21-23: Normal working hours for young persons may not exceed seven hours per day. It is prohibited to employ young workers on night work between 10 p.m. and 6 a.m.; overtime work; weekly rest days; and public holidays. The law also defined those normal hours of work for young workers shall not exceed seven hours a day.
- It is forbidden to employ women between 10 p.m. and 6 a.m. except in administrative and technical jobs or in any other jobs related to health and social services. Otherwise an authorization is to be obtained for purposes only related to the public interest.
- Article; 42: The Labor Code states that maximum weekly working hours are 48. However, the project has specified working hours as not exceed 40 hours/ week, taking into account that Sundays and Saturdays are the official weekend in the country, and work will not be performed during which.

10. Grievance Mechanism

10.1. Grievance Mechanism Description

Under ESS2, a worker Grievance Redress Mechanism "Worker GRM" will be provided for all direct workers and contracted workers to raise workplace concerns, including GBV/SEA/SH relating to the workplace. A direct worker or a contracted worker, who has any complaint or grievance has the right to present it and eventually get a proper response on it. The MoFEP, at national and State levels, and contractors, as well as CSO/NGOs will establish an accessible and functional worker GRM for all categories of employees identified in this document. However, details of the grievance mechanism specific for community workers/labor is set out under Section 12- Community workers, of these LMPs.

According to ESS2 paras. 21-23, different types of workers (including all direct workers and contracted workers, and were relevant, their organizations) may approach the workers' GRM for the following key reasons, among many others:

- Demand for employment opportunities;
- Labor wages rates and delays in payment of wages;
- Disagreements over working conditions;
- GBV/SEA/SH in the workplace; and
- Health and safety concerns in work environment.

The worker GRM, which is different from the public GRM (beneficiaries and non-beneficiaries), will leverage existing procedures and systems, and will be established in early stages of the project and further developed during the course of the project. The worker GRM will be based on the requirements of the WB's ESS2 – Labor and Working Conditions. Specifically, the worker GRM will have the following key principles:

- It will be made available for all direct and contracted workers (and were relevant their organizations);
- 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 that they understand, without any retribution;
- It will operate in an independent and objective manner;
- It will be a free system. Complaining workers will not pay fees to use the worker GRM;
- It will utilize existing grievance systems and experiences. In this context, the worker GRM will leverage HR complaining procedures for direct workers that are available at their respective ministries and departments, and will ensure HR procedures at contractors' organizations are consistent with the official worker GRM system characterized in this document, which will be further referenced in their working agreements, and monitored accordingly;
- Anonymous grievances are also allowed and facilitated and will be treated equally as 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 grievances will be treated confidentially;
- To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the worker GRM will have a different and sensitive approach to GBV/SEA/SH-related cases;
- It does not replace or override the 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 work situations through this system; and
- 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 GRM will have the following design and procedural features:

- Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and all pertinent information, such as: the designated call centers, hotline numbers, email addresses, office work hours, comment/complaint forms, suggestion display boxes, stipulated timeframes to respond to grievances; info on a register to record and track the timely resolution of grievances; the responsible department to receive, record and track resolution of grievances, and other means as needed;

- The complainant will be able to use mobile-phone based applications, and in-person centers 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) sort and process, (iii) acknowledge and follow up, (iv) verify, investigate and act, (v) monitor and evaluate, and (vi) provide feedback to the complainant to ensure effectiveness (see figure 1 below);
- Grievance handling will be transparent and aggrieved parties will be informed within 10 days of their grievance application, either with a respective solution or with a request of extension;
- The aggrieved party will have the option to refer to a grievance log with key information that will be established by the State MoFEP and quarterly reported upon; and
- If not satisfied with the outcome of the State level, the aggrieved party will be able to access a second level committee on the national level within the MoFEP.

The following diagram shows the proposed GRM Value Chain.

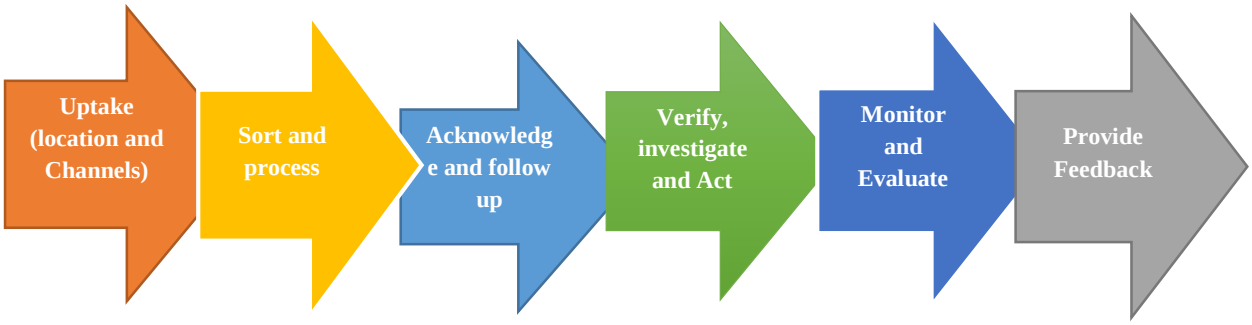

Figure 1: Worker GRM Value Chain

- Uptake: how are grievances collected? At how many locations, and through what channels? What organizational structure for grievance handling has been put?
- Sorting and Processing: How are grievances categorized, logged and prioritized?
- Acknowledgement and follow-up: Are complaints provided receipts? How are they provided with a progress update?
- Verification, Investigation and Action: How are information about the grievance gathered to resolve it? How are grievances escalated to a higher level?
- Monitoring and Evaluation: How are grievances tackled? How is grievances' data analyzed? How are processes modified to prevent grievances from recurring?
- Feedback: How are GRM users informed about the results of the investigations and actions taken on their grievances?

10.2. Procedures for Complaining

According to Article 36 of the Public Civil Service Regulation 2007, the civil servants' right to raise a grievance, while on duty, is maintained, which can include any of the above mentioned reasons. However, the regulation has not explicitly described the grievance mechanism, through which the worker can start his/ her case and receive feedback accordingly, thus leaving it internally regulated

within the organization. The grieved direct works of the Project are expected to follow the procedures of their line ministries and departments, which are basically put by their relevant HR system for addressing HR-related issues at the workplace. Complaints can be made verbally or in writing, including telephone calls and emails, to the concerned personnel ombudsman (identified by the organizational structure), followed by a proper documentation when received. Ideally, response time shall not exceed 10 working days all in all. It is expected that each internal GRM shall commit to the above stated principles and follow the GRM value chain accordingly. In cases where GRM provisions at a certain workplace are not enough or don't fulfill requirements of these LMPs, the Project will fill the gap by providing further arrangements through the Project's GRM manual.

As for workers of Project contractors, they shall follow their organization's GRM. The contractors shall establish, maintain, and operate a GRM consistent with the requirements of ESS2 aiming at soundly receiving and facilitating Project related complaints. The bidding documents provided by potential contractors shall include a clear information about their intended GRM for the Project, such as: i) a clear and detailed procedure for receiving grievances through a complaint form, suggestion boxes, emails and telephone calls, among others, ii) the stipulated timeframes to responding to grievances, iii) the established register to recording and tracking the timely resolution of grievances, and iv) the responsible officer/ department to receiving, recording, and tracking resolution of grievances.

The Project contractors shall include their effective grievance procedures in the employment agreement, and inform their workers upon their onboarding on the formal worker GRM established for all employees, and how they, and to whom they can address their complaints, including complaining channels and timeframes for responding. The Project contractors shall post their grievance procedures at workplace and make them accessible by their staff. The grievance feedback shall be communicated back to the grieved worker per the set timeframe (typically not exceeding 10 working days) by telephone, fax, email, or in writing. In case of any discrepancy with theses LMPs, the contractors will be asked to update their procedures according to the requirements of these LMPs and per further requests made by the PIU. Project workers can reach out PIU at the Federal and State MoFEP at the time they feel not treated well, or dissatisfied about the procedure for further follow up. The PIUs are reachable through their dedicated hotlines, emails, and other formalized social platforms, which shall be announced in due time.

Further, the Project's direct and contracted workers have the right to appeal their cases at the court and through pertinent laws (The Labor Code) in case they are dissatisfied with the final resolution.

10.3. Capacity Building for Worker GRM's Responsible Staff

The project will develop a capacity development plan for worker GRM responsible bodies and ensure that the GRM officers receive adequate training on their roles and responsibilities as well as the overall procedure of the GRM. The worker GRM will be described in staff induction trainings, which will be provided to all project workers. Further, the project will ensure that adequate resources are available for running and managing the worker GRM. Training topics would include workers' rights and pertinent national and international legislations; receiving, filing, and closing work-related complaints; dealing with complaints raised by vulnerable workers (including female and young workers of working age, as well as workers with disabilities); and IT and communication skills.

On GBV/SEA/SH, there will be a need to ensure that GRM procedures and mechanisms for reporting allegations of GBV/SEA/SH are known to all GRM Focal Persons. And most importantly to fulfil the role of addressing GBV/SEA/SH, focal persons will be trained (and/or have previous knowledge and experience) on GBV/SEA/SH related Guiding Principles including those of confidentiality and safety of complaints/survivors, on the survivor -centered approach. This set of skills will help GRM Focal Persons to support the quality of the complaint mechanism, while at the same time ensuring the

adherence to GBV/SEA/SH related Guiding Principles and a survivor-centered approach, including right to safety, respect, and confidentiality, of the complaint intake and management.

10.4. Promotion of the worker GRM

The worker GRM messaging will be incorporated into the wider SFSP Communication Strategy. Information on the various channels to submit grievances, complaints, and concerns will be publicized through meetings, monthly information brochures and posters explaining the GRM process in languages understood by employees and through one on one meetings during recruitment. Those posters will be displayed in accessible places, and suggestion boxes will be also available in each locality, state level responsible ministries and all implementing agencies' (ministries') offices. Meetings will be held at least quarterly; announcements will also be placed on notice boards. Other sensitization methods such as print media as well as electronic media such as adverts on local radio will be used.

10.5. World Bank Grievance Redress System

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

https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

11. Contractor Management

11.1. Selecting Contractors

The project anticipates involvement of various service providers (humanitarian and other NGOs, as well as private sector). The contracts will include provisions related to labor and occupational health and safety as provided in the World Bank Standard Procurement Documents and Sudan Labor Law. Specifically, the Project will ensure the project contractors (including third party suppliers) provide the following information as part of the contracting process:

- Corporate registers and public documents relating to records of labor law violation, including reports from inspectorates and other competent authorities;
- Business licenses, registrations, permits, and approvals;
- Proofs of having a labor management system in place, including OHS-related management systems and associated procedures, templates and forms;
- Qualifications and certifications of labor management, safety and health personnel;

- Certifications/ permits/ training qualifications of workers, who will perform the required work;
- Records of safety and health violations and responses;
- Payroll records and proofs of enrollment of workers in benefit-related programs;
- Identification of safety committee members and records of meetings, as seen appropriate by the project management, to the nature of goods and services to be rendered; and
- Copies of similar engagement with other employers, showing adequate experience and compliance with sensitive work issues, such as, child labor, forced labor, GBV/SEA/SH, OHS, and others, as required by the provisions of ESS2 (all except paras. 34-38).

The PIU will ensure that the requirements of the Environmental and Social Standard (ESS2) on labor and working conditions and non-compliance remedies are incorporated into the Contractors' contractual agreements. Contractors will be required to develop and sign a contractors' ESMP that will also include issues of GBV/SEA/SH, child and forced labor, child protection and accessibility of GRM at contractor's worksite, as well as a specific worker code of conduct. Similarly, the PIU will ensure that issues concerning subcontracting are done with the written consent of the relevant labor inspection departments at the MoLSD.

11.2. Managing and Monitoring Performance

The PIU within MoFEP will manage and monitor the performance of contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties) and labor management procedures. The MoFEP, through PIU, will undertake due diligence assessment of the engaging CSOs/NGOs and contractors on their labor practices and adherence to the national law, Environmental and Social Management Framework (ESMF), ESS2 and this LMP. This will include periodic audits and spot checks of project locations as appropriate. Specifically, the PIU staff will look how the following obligations are fulfilled by the Contractors:

- Labor conditions: records of workers engaged under the Project, including sample contracts, registry of induction of workers, and working hours' logs;
- Workers: number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labor is involved, and skill level (unskilled, semiskilled, skilled, supervisory, professional, managerial);
- Training/induction: dates, number of trainees and topics, records on training provided for contracted workers that were tailored to educate workers on occupational health and safety risks and applying corrective and preventive measures;
- Safety: recordable incidents, such as, lost time incidents, medical treatment cases, first aid cases, remedial and preventive activities taken, as well as reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions, records relating to incidents of non-compliance with national law;
- Details of any security risks: details of risks the Contractors may be exposed to while performing their work—the threats may come from third parties, external to the project; and
- Worker grievances: details including occurrence date, grievance description, and date submitted; actions taken and dates; resolutions/referrals (if any) and progress dates; and follow-

up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of preparing the new report.

In ensuring that there is compliance with the requirements of ESS2 by service providers, the project will regularly monitor and evaluate activities of contractors in line with the project's M&E framework. The project will also ensure that there is a comprehensive and continuous awareness raising among workers, about their entitlements.

11.3. Accessing Worker GRM

Where third parties are engaged in the project, the PIU will ensure that these parties report regularly on concerns raised by their workers, and how their grievances were resolves. These requirements will be included in the third party's terms and conditions. However, in case the third party doesn't possess any dedicated worker grievance mechanism, the PIU will ensure this project's worker GRM included in the third party's agreement and that it is used accordingly during the course of the contract period. As a result, the PIU will communicate back all concerns received by the workers of the third party to the attention of their respective employers for resolution. Similarly, these requirements will be included in the terms and conditions.

12. Community Workers

The project will approach community leaders in early stages of the project, with the help from local NGOs, CDAs and CSOs, to enter into implementation agreement during the course of the project. This type of work is envisaged as a contribution/ assistance from the community to the national program SFSP. Work will be provided on a voluntary, nonpaid basis, and is envisaged to gain enough facilitation and buy-in by the community leaders themselves. In this context, SFSP might consider bringing in the community leaders to support identification and enrollment process until local teams have enough capacity to take over. Community workers, as being part of the larger project workers, will be exposed to a variety of social risks and impacts, such as, community health and safety, OHS, child labor, forced labor, GBV/SEA/SH, disputes over terms and conditions of engagement, security risks, discrimination, and exclusion of women and other vulnerable groups. Descriptions of such risks and impacts as well as the proposed mitigation measures are presented in section 3 and will apply to community workers as well. More detail on community workers' terms and conditions, OHS, measures against COVID-19, and GRM modality is provide below (in line with requirements of ESS2 and provisions of this LMP):

12.1. Terms and Conditions

Community workers will be voluntarily contracted, through collective community agreements, to perform the following activities among others, which will be clearly defined in their respective agreements:

- Participate in a one-day training workshop for frontline workers, community mobilizers and house-to-house volunteers;
- Distribute communication materials across the districts (Mahalias);
- Assist in the activities concerning community dialogues, community stakeholders' consultation and public gatherings (once allowed);

- Assist in outreach and communication campaigns, if allowed in strategic places, parks, markets, open-air theaters, etc.; and
- Assist in house-to-house mobilization; as well as collect public feedback on the project.

Based on terms and conditions attached to community workers, the national Labor Code cannot be applied. Therefore, community workers will be managed through provisions of ESS2 and this LMP.

Community workers will be engaged during normal working hours 8:00 AM – 5:00 PM, which will be broken by no less than 1 hour for rest, and applied no later than 4 consecutive working hours. Working hours may not exceed 40 hours/ week, taking into account that Sundays and Saturdays are the official weekend in the country, and work will not be performed during which.

Working hours may decrease below 40 hours/ week, as will be agreed with community representatives and CDAs and relevant CSOs/NGOs, who will facilitate such agreements. This will be determined according to level of work, type of work required, and based on each state's political and security circumstances;

All means of facilitation and support will be provided to community workers to ensure a smooth performance. Community workers are not expected to incur any expenses to engage and/or complete work, as assigned;

Adequate provisions for transport, meals, toilets, and places for rest will be provided to community workers for no cost. These will take into account special needs of women and the disabled, as well as other participants' needs.

12.2. Occupational health and safety

Agreements will include an OHS focal person, who will be available to mentor, manage, and monitor implementation of OHS measures during work. His/her contact information will be made available and reachable by all workers under his/her responsibility. His/her responsibilities will be made clear and attached to the respective agreement.

All project's community workers will be engaged in on-day orientation training at the onset of their collective contract, which will include, but be not limited to: specific tasks, OHS-measures (including and protection against COVID-19); communication channels, workers' rights, and GRM information.

All community workers will be provided with enough provisions for personal protection, equivalent to the type and place of work assigned to them. This will be determined per each agreement. In particular, all community workers will be provided with hand sanitizers, masks, and gloves suitable for protection against COVID-19. All measures tailored to protect against transmission of COVID-19/ in case of infection/ communication, as provided in this LMP (section 7 policies and procedures) will be applied for project community workers.

Work and/or gathering places will ensure enough shelter against hot and cold weathers, far enough from hazards, such as dust, noise, and traffic, and close enough to first aid measures onsite.

All workers will be able to benefit from health care against work incidents for no extra cost.

Details on social, health, and security benefits and programs will be determined based on types, level, and expected risks of assignments, and will be attached to the respective agreements accordingly.

All community work performed under this project will be subject to labor inspection by the project management and by the competent authority, all in accordance to national laws, regulations, and standards.

12.3. GRM

The project will ensure a fair, safe, non-exhausting, non-discriminatory, free of GBV/SEA/SH working environment for all project's community workers.

All community workers will have the right to express their grievances as a result of performing their voluntary work, in a way that maintains their dignity, preserves their privacy, and ensures a fair resolution, which will be achieved through responsible NGOs in the field.

As such, the project will set in place, in its worker GRM manuals (described in section 10 above), all possible means of GBV/SEA/SE protection, proportionate, understandable, and easily accessible for vulnerable community workers, including women, young workers of working age, and the disabled. Accordingly, the project will oblige CSOs/NGOs, who hold the collective agreement with subject volunteers to develop/update their GRMs in line with the project's overall worker GRM. Nevertheless, the community workers will have the right to address their complaints to relevant labor inspection departments.

All community workers, in early stages of the project, yet before commencing their assignments, will be introduced to the project's worker GRM information, including: workers' rights (as volunteers), available channels for raising issues, response times, and remedies expected, among others.

The community workers' GRM developed and maintained by responsible CSOs/NGOs, will be imbedded in the overall project workers' GRM. The project management (through dedicated social/ GRM specialists) will file and keep grievance records, analyze statistics, and recommend areas for improvement on the GRM, for community workers in particular.

13. References

- NATLEX/ ILO. The 1997 Labour Code - Sudan. Retrievable through: https://www.ilo.org/dyn/natlex/docs/WEBTEXT/49122/65103/E97SDN01.htm

- NORMLEX/ ILO. C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111). Retrievable through https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312256:NO

- NORMLEX/ ILO. Ratifications for Sudan. Retrievable through http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103176

- The World Bank (2017). Environmental and Social Standards (ESSs). Retrievable through http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=45&zoom=80

Annex I – Draft Worker Code of Conduct[7]

1. Brief & Purpose

Worker Code of Conduct outlines our expectations regarding SFSP workers' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. But we expect all project workers to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

2. Scope

This code of conduct applies to all project workers (SFSP workers) regardless of employment agreement or rank.

3. Policy elements

The project workers are bound by their contract/agreement to follow our Worker Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

a. Compliance with law

All project workers must protect project's legality. They should comply with all environmental, safety and fair dealing laws. Workers are expected to be ethical and responsible when dealing with project's finances, products, partnerships and public image.

b. Respect in the workplace

All project workers should respect their colleagues. Workers are not allowed to display any discriminatory behavior, exploitation, harassment or victimization.

c. Protection of Project Property

All workers should treat project's property, whether material or intangible, with respect and care.

The SFSP workers:

- Shouldn't misuse project equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Workers should use them only to complete their job duties.

Project workers should protect project facilities and other material property (e.g. project cars. workplace equipment and furniture, etc.) from damage and vandalism, whenever possible.

d. Professionalism

All project workers must show integrity and professionalism in the workplace:

[7] Adapted for the SFSP from: https://resources.workable.com/wp-content/uploads/2015/11/Sample-Employee-Code-of-Conduct-Policy.docx

- Personal appearance

All workers must follow our dress code and personal appearance guidelines, including dressing and applying personal appearance appropriate to the culture and traditions of communities, where their duties are taking place.

- Corruption

The project workers are not allowed to receive gifts from clients or partners. No briberies for the benefit of any external or internal party.

- Job duties and authority

All project workers should fulfill their job duties with integrity and respect toward each other, project stakeholders, and the beneficiary community at large. Supervisors and managers mustn't abuse their authority. Team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

- Absenteeism and tardiness

Project workers should follow their schedules. We can make exceptions for occasions that prevent workers from following standard working hours or days. But, generally, we expect workers to be punctual when coming to and leaving from work.

- Conflict of interest

Project workers should avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- Collaboration

Project workers should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- Communication

All project workers must be open for communication with their colleagues, supervisors or team members.

e. Occupational Health and Safety

All project workers shall:

- Wear personal protective equipment (PPE), in the correct prescribed manner, at all times when at the work site or engaged in project related activities.
- Take all practical steps to implement the project's environmental and social management plan.
- Implement the occupational health and safety management plan(s) established by the project's Management Plan.
- Agree to undertake all health screening and other measures required by national law and the requirements of the contractors and the project in relation to COVID-19.

f. Gender Based Violence and Sexual Harassment

All project workers must:

- Attend and actively participate in training courses related to ESHS, OHS, HIV/AIDS, GBV, as requested by the employer.

- Treat women, children (persons under the age of 18), and men with respect regardless of gender, race, color, language, religion, political or other opinion, gender identity, national, ethnic or social origin, property, disability, birth, or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with any person under 18 years of age—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not engage in sexual harassment, such as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including subtle acts of such behavior.
- Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- Unless there is the full consent by all parties involved, the project workers shall not have sexual interactions with any member of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex.
- All project workers shall consider reporting through the GRM or to the manager any suspected or actual GBV by a fellow worker, whether employed by the employer or not, or any breaches of this Code of Conduct.

g. Policies and procedures

All project workers should read and follow project documents and procedures

h. Disciplinary actions

Project management will take disciplinary action against workers who break the code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

Legal action might be taken in cases of corruption, theft, GBV, embezzlement or other unlawful behavior. All reports/incidents of GBV in relation to a project worker, including sexual harassment between project workers, will be reported to the appropriate legal authorities, as well as the PIU and clearly documented in project progress/monitoring reports submitted to the World Bank.